



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

May 17, 2002

Mr. Jeff McCullough
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7017

Re: **Draft Record of Decision**
Calverton NWIRP – Site 1
Site #152136
Calverton / Suffolk County

Dear Mr. McCullough:

I have reviewed the May 2002 draft Record of Decision (ROD) for the above referenced site and offer the following comments:

Page 1, Title: Update 'April 2002' to match the date on the cover.

Section 2, Site Location and Descriptions: The last sentence in the document's responsiveness summary says that groundwater at Site 1 will be the subject of a separate ROD. The site description needs to include this statement, as until that point it is unclear why groundwater is not discussed in more detail. Also, please clarify whether the separate ROD will only be for Site 1 groundwater, or will cover groundwater for the entire site.

Section 4.3 – Summary of Human Exposure Pathways: Typically, the New York State Health Department does not use a risk assessment - based approach when describing potential exposures at inactive hazardous waste disposal sites. It is recommended that an exposure-based approach be used to evaluate potential impacts to human health in the Record of Decision (i.e. Pathways that are known to or may exist at the site include: Direct contact or ingestion of contaminated soils and sediments.. Currently these exposures are limited to on-site personnel. Future land use scenarios could result in additional exposures to contaminated soils and sediments.).

Section 7.1, Alternative 3: The description of this alternative lacks sufficient detail. Please include the following information: the volume of soil to be removed, whether confirmatory sampling will be conducted and the criteria to determine the extent of the

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excavation, if deed restrictions will be required and the frequency and duration of the short-term monitoring program. In addition, please revise the second sentence of the second paragraph to read, “However, Short-term monitoring would be conducted to evaluate *the effect of* source removal on groundwater quality.”

Section 7.2 – Evaluation of Alternatives: My understanding is that the NYSDEC is now requiring annual certification of institutional controls and deed restrictions, rather than every five years. Please revise this section accordingly.

Table 1: Unlike the upper portion of the table under ‘Range of Positive Detections’, only a single value is provided for metals, despite multiple detections of each. Please include the range, or specify whether the maximum or average value is being presented.

If you have any questions, please contact me at (518) 402-7880.

Sincerely,

Wendy S. Kuehner
Assistant Sanitary Engineer
Bureau of Environmental Exposure
Investigation

cc: Mr. R. Fedigan /Ms. W. Kuehner / File
Mr. S. Robbins - SCDHS
Mr. W. Parish, DEC Reg.1

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