



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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NWIRP CALVERTON NY
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OCT - 6 2000

Mr. James Colter
Remedial Project Manager
Department of the Navy
Northern Division
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Re: NWIRP - Calverton (formerly Grumman)
Site 7 - Fuel Depot Monitored Natural Attenuation (MNA) Work Plan
EPA I.D. #: NYD003995198

Dear Mr. Colter:

This memorializes the agreements that were made at our June 26, 2000 conference call in response to your January 31, 2000 "Draft Letter Work Plan for Site 7 - Fuel Depot Monitored Natural Attenuation Work Plan," as revised on April 28, 2000, and our comment letter dated February 29, 2000. It also conditionally approves your testing for methyl tert-butyl ether (MTBE), and it serves as a reminder for you to provide EPA with periodic updates of activities at each of the sites undergoing investigation and/or remediation at this former facility.

The following is my understanding of the details and agreements reached via the June 26, 2000 conference call:

1. Your response to our comment # 1 is acceptable. The reports that you cited in your response to comments, provide an adequate review of background information on site hydrogeology and past sampling data.
2. We concur with your response to our comment # 2, and your agreement that MNA without source treatment is highly unlikely to be an effective remedy, unless there is statistically significant data documenting attenuation of the source.
3. We concur with your response to our comment # 3. The 3-dimensional site characterization graphs, contained in the April 1999 EVS presentation, provide an adequate summary of existing hydrogeologic and water quality data.

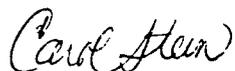
4. As per our discussion at the June 26, 2000 conference call, please note that the latest EPA standard operating procedure (SOP) requires low flow sampling techniques for all sampling events. It is our understanding that during the conference call, you had agreed to do so for subsequent sampling events at Site 7.
5. Regarding your proposal to use the "soda straw" method for sample collection (page 3 of Draft MNA Workplan), EPA would be willing to consider concurring with its use, provided that you initially collected several initial side-by-side samples using both the "soda straw" method and either a submersible positive pressure or variable rate centrifugal (Grundfos) pump. If the results are found to be similar for both methods, use of the "soda straw" method most likely would be acceptable for the remainder of the samples.
6. Your response is acceptable for the types of contaminants (LNAPLs) found at Site 7.
7. We concur with your clarification that carbon dioxide will be analyzed in both the field and the laboratory to determine the accuracy of the field carbon dioxide tests.
8. We concur with your response that values other than TOC will be referenced in the natural attenuation results report.
9. We concur with your response that other viable alternatives will be evaluated in addition to MNA.
10. Your response is acceptable that the MNA results report will show plan views depicting key geochemical parameters such as dissolved oxygen along with total or selected VOCs. Your existing historical data is adequate at this time for use as time-based data. It is our understanding that, if MNA is accepted as a remedy, you will be collecting data over time to monitor the effectiveness of MNA.
11. The depths of the wells are acceptable, based on historic data, modeling results, and the types of groundwater contaminants at this site.

Additionally, EPA has reviewed the VOC groundwater sampling data that accompanied your July 6, 2000 e-mail, and we agree with your determination that, based upon existing data, there does not appear to be MTBE contamination in the groundwater. Please note, however, that in the event that there is an indication in the future that MTBE might be present in the groundwater, you would be required to resample for it.

Also, as was agreed upon at the June 26, 2000 conference call, this is to request that we receive updates (quarterly or more frequently) of the activities at each of the sites at the NWIRP-Calverton.

Please note that these comments are solely from EPA, and that other regulatory agencies may have additional comments independent from ours, which are based on their own regulations and policies. If you would like to discuss any of the above comments in more detail, please feel free to contact me at (212) 637-4181.

Sincerely,



Carol Stein, P.E.
Environmental Engineer
RCRA Programs Branch

cc: Henry Wilkie, NYSDEC
Steve Paszko, NYSDEC