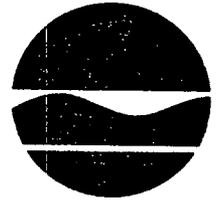


New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling
Commissioner

AUG 19 1993

Ms. Debra L. Felton, P.E.
Remedial Project Manager
North Division
Naval Facilities Engineering
10 Industrial Highway
Mail Stop #62
Lester, PA 19113-2090

Dear Ms. Felton:

**Re: Grumman-Calverton RCRA Facility
Assessment Sampling Visit Work Plan
Coal Pile, ECM, and Cesspool/
Leach Field Areas**

Enclosed are the joint United States Environmental Protection Agency (USEPA) and New York State Department of Environmental Conservation (NYSDEC) final comments on the RCRA Facility Assessment (RFA) Sampling Visit (SV) Work Plan for the Naval Weapons Industrial Reserve Plant (Grumman), located in Calverton, New York. These comments pertain to three SMUs/AOCs that were discovered at the facility after the March 1992 issuance of the USEPA HSWA permit and the NYSDEC Part 373 permit. These areas are the Coal Storage Pile Area, the Electronic Counter Measures (ECM) Area, and the Cesspool/Leach Field Areas (multiple locations).

Comments on the draft RFA SV Work Plan were sent to the Navy in December of 1992. The Navy had incorporated many of these comments in a revised RFA SV Work Plan, dated January 1993. However, there were several outstanding issues which were not addressed via the January 1993 document.

The enclosed set of comments includes the comments from the USEPA Region II RCRA and CERCLA Programs and the NYSDEC Division of Hazardous Substances Regulation. These comments had been discussed with the Navy at the March 4, 1993 meeting at the facility, which was attended by representatives of our respective staffs. We conditionally approve the RFA SV Work Plan provided that the activities specified via these comments are implemented by the Navy.

Ms. Debra L. Felton, P.E.

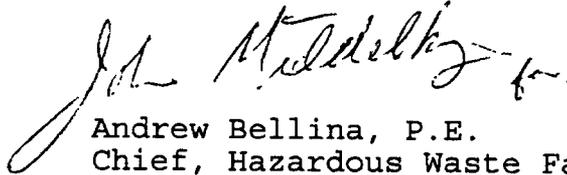
2.

Due to the imminent start of negotiations for CERCLA federal facilities or an Interagency Agreement (IAG) for the Calverton facility between the USN, USEPA, and NYSDEC, the NYSDEC Division of Hazardous Substances Regulation and the Division of Hazardous Waste Remediation are conducting a co-review of all documents. This joint review in no way diminishes Navy responsibility under the USEPA HSWA and NYSDEC Part 373 permit issued in March 22, 1992. Therefore, you are advised to implement the RFA SV Work Plan within 30 calendar days of this written conditional approval. Further, you must notify the USEPA and NYSDEC 14 days prior to commencing the work detail in the RFA SV Work Plan.

Sincerely yours,



Marsden Chen
Chief, Federal Projects Section
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation



Andrew Bellina, P.E.
Chief, Hazardous Waste Facility Branch
U.S. Environmental Protection Agency

Enclosure

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

FINAL COMMENTS

NWIRP (GRUMMAN) CALVERTON

RFA SAMPLING VISIT WORK PLAN

FOR COAL PILE, ECM, AND CESSPOOL/LEACH

FIELD AREAS

These comments were presented and discussed with the Navy at the March 4, 1993 meeting at the facility.

1. On Page 13, Table 3-1, the holding time for the volatile samples is 14 days and preservative HCl to $\text{pH} < 2$. The New York State Department of Environmental Conservation RCRA Quality Assurance Project Plan Guidance, Page D-14, requires a holding time for 7 days and preservation cool to 4°C.
2. Page 44, las paragraph - Samples from off-site monitoring wells, the use of dedicated polyethylene rope unacceptable. Use Teflon coated wire, stainless steel, or polypropylene monofilament. Samples collected for VOC analysis must be collected within three hours or purging the well.

EPA
FINAL COMMENTS
NWIRP (GRUMMAN) CALVERTON
RFA SAMPLING VISIT WORK PLAN
FOR THREE ADDITIONAL AREAS

The enclosed set of comments includes input from the EPA Region II RCRA and CERCLA programs. These comments had been discussed with the Navy at the March 4, 1993 meeting at the facility which was attended by representatives of our respective staffs. This was followed up via a conference call between EPA and the Navy on April 2, 1993. We conditionally approve the SV Work Plan provided that the activities specified via these comments are implemented by the Navy:

1. Electronic Counter Measures (ECM) Area - In reference to comment #7 of the EPA letter dated December 14, 1992, and as discussed at the meeting and conference call with the Navy, there is evidence of construction debris in the vicinity of the ECM. We request that three samples be taken at the alleged dump area adjacent to the ECM area. The sampling locations should be biased toward areas where there are visible signs of contamination or stressed vegetation, if they are present. If these visible signs cannot be found, the locations should be randomly selected. A full Target Compound List/Target Analyte List (TCL/TAL) should be conducted on these three samples.

2. Cesspool/Leach Field Areas - In reference to your response to comment #13 of the EPA letter dated December 14, 1992 and our discussions at the March 4, 1993 meeting, it is our understanding that during the SV, a minimum of one soil boring will be taken at each of the cesspool/leach field areas, regardless of whether the soil gas results indicate contamination. If contamination is found in any of these soil borings, the full TCL/TAL list of contaminants (including semivolatiles organics and pesticides) shall be tested for at that particular cesspool/leach field area during the RFI.

3. Evidence of contamination found during sampling - In reference to comments #5 and #7 of the EPA letter dated December 14, 1992, and our conference call of April 2, 1993, please revise the text to specify that "visually characteristic" will pertain to stressed vegetation, and any other visual signs that there might be contamination in addition to the "sludge or oil" mentioned in the text. If during sampling activities, soils/sediments are collected which are visually characteristic of contamination, or if the area appears to have stressed vegetation due to contamination, the samples shall be analyzed for the full TCL/TAL analysis.