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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

MAR - 9 1994

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

Dear Mr. Colter:

Re: NWIRP - Bethpage
EPA I.D. No:NYD002047967

We have reviewed the Navy's responses to EPA's comments on the draft Feasibility Study (FS) for the NWIRP facility in Bethpage, New York. The comments, listed below, incorporate reviews by the CERCLA and RCRA programs at EPA-Region II. Our comments are organized as follows: comments that directly effect the FS and which will require clarification or modification in the final FS; and comments related to the Navy's approach to the site, and which may require specific consideration in the proposed plan and Record of Decision (ROD).

A. Comments That Directly Effect the FS

1. Since the agreement has been reached to defer the implementation of a remedial groundwater action program until a later date, references to groundwater cleanup should be removed from the FS.
2. Remedial Action Goals - EPA commented in specific comment #9 that the remedial action goals for soil are not clear from Table 2-12. The Navy's response is that different alternatives attain different goals. This is an inadequate response. The remedial action goals should be clearly identified and the analysis of each alternative should discuss how treatment, containment, and/or institutional controls are combined to ensure management of soils exceeding the remedial action goals.
3. Interim vs. Final Action - EPA's general comment 1.a and specific comment 10 discussed concerns with the delineation of the extent of soil contamination. Since EPA considers the

Grumman and Navy properties as one facility under RCRA, the Navy actions would not be the final action for the RCRA facility. The FS should be clear that if additional soil action are needed for the Grumman property, those will be handled as an additional action. Also, the FS should state specifically that the planned sampling of the residential neighborhood may result in additional actions, if warranted.

B. Comments Related to the Navy's Approach to the Site

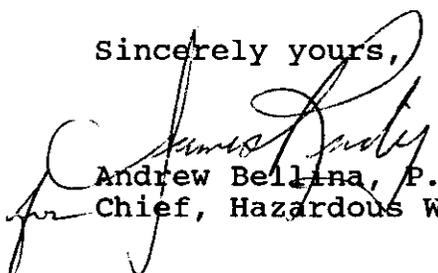
The following comments may effect language in the proposed plan and ROD. Please ensure that the FS does not contain any statements that might incorrectly imply that these issues have been completely agreed upon at this time.

1. Tentatively Identified Compounds (TICs) - The Navy stated that CLP protocols were followed as part of the remedial investigation. EPA believes that all future sampling needs to also include CLP protocols regarding TICs. This is important for two reasons. First, TIC data may assist the Navy, Grumman and Hooker-Ruco in the assessment of contribution to the groundwater contamination. Second, residual TICs in soil which are not addressed by the proposed remedy may contribute to future groundwater contamination which may exceed standards.

2. Recharge Basins - EPA has commented that the underlying soils at the recharge basins may present a continued source of groundwater contamination. Without sampling the underlying soils, it will not be possible to evaluate whether the soils meet the remedial action goals. EPA does not want to delay the proposed actions. EPA recommends that the recharge basin soils be sampled as part of the pre-design work. The groundwater and sediment in the vicinity of the recharge basins contained TICs above the recommended guidelines. This indicates that while the recharge basins may not currently be contributing large amounts of volatile organic compounds, there may be contribution of these other contaminants. At a minimum, the groundwater must be monitored and evaluated to assess the continued impact on groundwater quality.

If you should have any questions regarding these comments, please contact Ms. Carol Stein, of my staff, at (212) 264-5130.

Sincerely yours,


Andrew Bellina, P.E.
for Chief, Hazardous Waste Facilities Branch

cc: Salvatore Ervolino, NYSDEC
John Barnes, NYSDEC
Dennis Lucia, NYSDEC