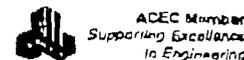


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Memo to: Mr. Steven M. Scherf, P.E., Project Manager, NYSDEC

From: Gary E. Loesch, P.E. 

Re: Grumman Aerospace – Bethpage (NY Site 1-30-003A) & Naval Weapons
Industrial Reserve Plant – Bethpage (NY Site 1-30-003B) Site
Proposed Remedial Action Plan (PRAP)
Operable Unit 2 – Groundwater Remedy

Date: January 8, 2001

We are submitting the following questions on behalf of the South Farmingdale Water District (SFWD) and the New York Water Service Corporation (NYWS) for discussion at our meeting of January 9, 2001:

1. How can the Remedial Investigation / Feasibility Study (RIFS) (on which the PRAP is based) be considered complete if the PRPs have not adequately determined the horizontal and vertical extent of the off-site groundwater plume?
2. Is it appropriate for NYSDEC to consider issuing a ROD when the Vertical Profile Boring (VPB) #76, indicates extensive off-site groundwater contamination near the intersection of Hicksville-Massapequa Road and Hempstead Turnpike and north of our supply wells?
3. Shouldn't the PRPs re-evaluate and modify the groundwater model utilized since the model did not predict the presence and concentration of trichloroethene that was measured in VPB #76, prior to the issuance of a ROD?
4. Shouldn't the PRPs proceed immediately with additional vertical profile borings and the installation of the monitoring wells in order to assess whether additional public water supply wells may be at near term risk?
5. Shouldn't the PRAP include a detailed schedule for the groundwater investigation that is still required to accurately delineate the plume, as well as implementation of treatment at GM 38?
6. Are there other "hot spots", similar to that at GM-38 nearer the NYWS and /or SFWD well fields? How will the NYSDEC hold the PRPs accountable and obligate them to construct and operate the necessary and proper treatment facilities? What concentrations and location of the plume would be used as a trigger to require that the PRPs commence appropriate remediation and/or install appropriate treatment facilities?

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7. Shouldn't the PRPs delineate the extent of the plume asap so that appropriate alternatives can be considered for implementation, other than simply relying on treating public water supply wells that have been impacted by the plume? With so much more work that needs to be done to adequately delineate the plume so that appropriate remedies can be developed evaluated and a recommended plan put forth, what is the justification for issuing a ROD at this time?
8. Isn't it likely that at some future date, the plume will most probably impact Well Sites 3 and 6 in SFWD and the Seamans Neck Road Site operated by NYWS, but the answer to such questions as to which wells at these sites and when they will be impacted, as well as the present extent of contamination cannot be answered due to the lack of available information collected to date by the PRPs?
9. Will the NYSDEC require that the PRPs provide potentially affected water suppliers the location and depth of outpost monitoring wells? If there is disagreement between the PRPs and a water supplier on the location or number of wells, how does NYSDEC intend to address these differences?
10. Is NYSDEC's position consistent with that of the public water suppliers that if a water supply well is impacted by the plume, that the selection of a treatment/abandonment alternative is within the sole purview of the water supplier, and the total capital cost and annual operation and maintenance costs over not less than a thirty-year period be borne by the PRPs? If not, where does it differ?
11. Will the NYSDEC support the water suppliers position that if any site related contaminant is detected in an outpost monitoring well or a water supply well, and if the contaminant is confirmed in the second sample, that the water supplier shall determine the best alternative to be implemented and the time frame for implementation? If not, what position will NYSDEC be taking?
12. Why shouldn't both PRPs or at a minimum, Northrop Grumman, provide a letter of credit that would be sufficient to cover all anticipated future costs?

We thank you for agreeing to meet with the NYWS and SFWD on January 9, 2001 and look forward to a discussion of the above issues.