

Grumman Corporation

Bethpage, New York 41714-3580

September 18, 1992
FDP - 915

United States Environmental
Protection Agency
Air and Waste Management Division
Hazardous Waste Facilities Branch
Region II
26 Federal Plaza
New York, N.Y. 10278

Attention: Mr. Andrew Bellina, Chief

Subject: HSWA PERMIT CORRECTIVE ACTION REQUIREMENTS
(USEPA I.D. NO. NYD 003995198 -
NYSDEC PERMIT NO. 1-4730-00013/00001-0)
GRUMMAN AEROSPACE CORPORATION, CALVERTON, NEW YORK

Dear Mr. Bellina:

A meeting was held at the Naval Weapons Industrial Reserve Plant (NWIRP), Calverton, N.Y., between officials from the NYSDEC (Steve Kaminski, Henry Wilke, Robert Becherer, Tanya Hermos and Agnes Gara) and Grumman Corporation (J. Ohlmann and Herbert Highfill) on August 18, 1992, to discuss the status of the remedial efforts that have taken place at the facility to date. This letter is intended to summarize the status of these efforts.

A site inspection was conducted at the NWIRP - Calverton Facility during 1991 by the Navy under the guidance of the Federal Facilities Section (FFS) of the USEPA. A final inspection report was prepared and sent to the FFS as well as the appropriate state and local agencies. This report addressed the following AOC's and SWMU's:

<u>AOC/SWMU</u>	<u>REPORT SITE NO.</u>
o Northeast Pond Disposal Area	1
o Picnic Grounds Disposal Area	4
o Fire Rescue Training Area	2
o Old Fuel Calibration Area	6A
o Engine Run Up Area	6B

In addition, the site inspection and report included two other areas:

<u>AREA</u>	<u>REPORT SITE NO.</u>
o South End of Runway 32-12	6C
o Fuel Depot Area	7

Because the inspection was conducted prior to receipt of the HSWA Permit, the report did not follow the schedule provided under the Corrective Action Requirements.

However, after careful review of these requirements, Grumman and the Navy believe that this report should satisfy the requirements for the following:

- o RFA-SV Final Report for the Northeast Pond Disposal Area and the Picnic Grounds Disposal Area.
- o RFI Task I/Phase 1 Report for the Fire Rescue Training Area, Old Fuel Calibration Area, and the Engine Run Up Area

Based on the results of the site inspection conducted by the Navy, no further action is recommended at the Picnic Grounds Disposal Area or the Engine Run Up Area. Grumman requests that your office, in conjunction with the NYSDEC, review and evaluate the site inspection report to determine if it is consistent with our evaluation.

Further investigation has been recommended at the Northeast Pond Disposal Area and the Fuel Depot Area. The Northeast Pond has not been upgraded to RFI status nor has the Fuel Depot been added to the Corrective Action Requirements, however, the site inspection report should satisfy the requirements for an RFI Task I/Phase 1 Report for these areas in the event they are upgraded/added to the Permit. Further investigation has also been recommended at the Fire Rescue Training and Old Fuel Calibration Areas.

The Navy must follow a certain process for obtaining funds to conduct remedial activities. The first step includes issuing a scope of work to an environmental consultant contracted by the Navy. The Navy then prepares an estimate of what they think is reasonable for the scope of work issued. When the consultant submits the proposal, the terms are negotiated and the consultant modifies the proposal as necessary.

On July 31, 1992 Grumman received a clarification from your office regarding the lead agency overseeing these inspection efforts. This clarification allowed the Navy to properly prepare a scope of work which was submitted to the consultant on August 11, 1992. Once the consultant's proposal is approved by the Navy, a work plan will be developed and submitted to your office for approval. This document should satisfy the requirements for an RFI Task II/III Work Plan for the following areas:

- o Northeast Pond Disposal Area
- o Fire Rescue Training Area
- o Old Fuel Calibration Area
- o Fuel Depot Area

In addition, this document will include an RFA-SV Work Plan for McKay Lake. It should be noted that the Navy will not address this site in their investigation. The Navy cannot obtain funds for the site investigation of McKay Lake because it is a receiving water for an actively permitted facility (SPDES). Grumman will provide this work plan.

In summary, Grumman requests that your office:

- 1) Review the site inspection report to determine the corrective action requirements fulfilled to date, and whether they're consistent with our evaluation.
- 2) Evaluate delisting the Picnic Grounds Disposal Area and Engine Run Up Area.
- 3) Provide an extension of at least 90 days for submittal of the RFI Task II/III and RFA-SV Work Plans for the sites referred to in this letter.

If you have any questions or need any additional information, please do not hesitate to call me at (516) 575-2385.

Very truly yours,

GRUMMAN CORPORATION



J. Ohlmann, P.E., Director
Corporate Environmental Technology
and Compliance
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JO/HH:tla

cc: USEPA (3 copies)
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Attention: James Reidy

NYSDEC (2 copies)
Division of Hazardous Substance Regulation
50 Wolf Road
Albany, N.Y. 12233-7251
Attention: P. Counterman, P.E., Director
Bureau of Hazardous Waste Fac. Mgmt.

NYSDEC (1 copy)
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Attention: Robert Becherer

Steve Kaminski and Henry Wilke, NYSDEC, Albany
Agnes Gara and Tanya Hermos, NYSDEC, Stony Brook