



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

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NWIRP CALVERTON NY  
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JUL 13 1995

Mr. James Colter  
Remedial Project Manager  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial highway  
Mail Stop, #82  
Lester, Pennsylvania 19113-2090

Re: NWIRP/Grumman, Calverton, NY  
RCRA Facility Investigation (RFI) Report  
NYD003995198

Dear Mr. Colter:

United States Environmental Protection Agency (EPA) Region II has reviewed the RFI Report for the Naval Weapons Industrial Reserve Plant/Grumman facility, located in Calverton, New York. We offer the following comments which augment the comments previously submitted to you by New York State Department of Environmental Conservation (NYSDEC) in its letter dated June 12, 1995:

1. Site 1 (Northeast Pond Disposal Area) - Page 4-113 indicates that 1,1,1-trichloroethane was detected at one location in the fill material at a concentration of 390 mg/kg, and that the sample included contents from a buried drum. Appendix J indicates that this reading is from test pit sample NPWST220405. A high concentration of 2-methylnaphthalene (370 ppm) was also found in the fill material at this test pit.

Although the groundwater samples did not show high concentrations for these constituents, the groundwater samples do not appear to be representative of the groundwater in the vicinity of the test pit in question. Figures 4-3 and 4-7 indicate that none of the four groundwater samples taken for the Northeast Pond Disposal Area were taken in the vicinity of Test Pit sample NPWST220405. Figure 4-7 indicates that the closest groundwater monitoring well, NP-MW-01, is approximately 125 feet west of Test Pit #22. This is not downgradient of the test pit (groundwater flow direction is toward the east-northeast), nor is it of adequate proximity to indicate whether or not the constituents from this test pit have migrated into the groundwater. Therefore, we require that one or more additional monitoring wells be placed downgradient of Test Pit #22 and in closer proximity to it, to allow for an evaluation of the potential for groundwater contamination.

Although the groundwater samples did not show high concentrations for 1,1,1-trichloroethane, the report does indicate that only shallow samples of groundwater were taken at Site 1. As chlorinated organic compounds tend to accumulate at the bottom of a water table, there is a possibility that dense non-aqueous phase liquids (DNAPLs) may be present. If you have not already done so, please evaluate the possible presence of DNAPLs. If you have already conducted this evaluation, we would be interested in reviewing the results.

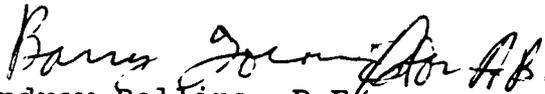
2. Site 2 (Fire Training Area) - On page 5-120, the text states that volatile organic compound contamination to the south (offsite) and east is not completely characterized. Table 5-13 indicates that sample FT-GW05-S which was taken just north of the chain link fence at the south of the property, had concentrations of chloroethane at concentrations of 130 ug/l in the groundwater. As the NYSDEC groundwater standard is 5 ppb, it appears that since the groundwater flow at the Fire Training Area is to the south-southeast, that there may be concentrations of chloroethane beyond the southern property boundary at levels considerably exceeding the NYSDEC groundwater quality standard. Therefore, it is important for you to characterize the groundwater beyond the boundary of the property as soon as possible. Module III, Section B.10 of your EPA HSWA Permit requires that you notify EPA, NYSDEC, and any person who owns or resides on the land which overlies the contaminated groundwater within 15 calendar days of discovery that contamination is found to have migrated beyond the facility boundary in concentrations that exceed groundwater standards.

3. We agree with the conclusions which state that further investigation is needed. All additional sampling should be conducted as soon as is feasible. In reference to Area #6A, the Fuel Calibration Area, the conclusion of the RFI Report states that the Environmental Baseline Survey (EBS) should consider the groundwater locations requiring additional definition of extent of contamination. This is conditionally acceptable, provided that the EBS is performed in a timely manner, and that the time needed for compiling the conclusions of the EBS will not delay the implementation of corrective measures.

4. Minor Comment: The tables in Appendix J for the Northeast Pond disposal area show Sample Number: NPSD020501 and its duplicate. However, Table 4-8 of the text shows Sample Number: NPSD020510 and its duplicate, with the same concentrations of constituents associated with it. The discrepancy in the numbering of these samples should be corrected.

Please respond to these comments within 30 calendar days of the date stamped on this letter. If you should have any questions, Ms. Carol Stein, of my staff, can be contacted at (212) 637-4181.

Sincerely yours,

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

cc: Dennis Lucia, NYSDEC