

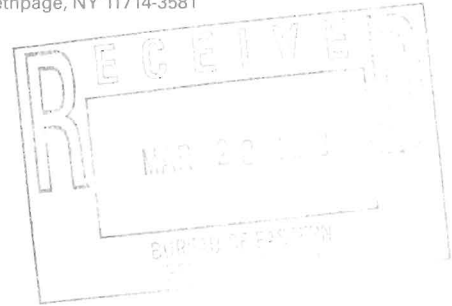
1-30-003A-02



Northrop Grumman Corporation  
Airborne Early Warning and  
Electronic Warfare Systems  
South Oyster Bay Road  
Bethpage, NY 11714-3581

ESH&M-03L-051  
March 25, 2003

Steven M. Scharf, P.E.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway, 11<sup>th</sup> Floor  
Albany, New York 12233-7015



Subject: Response to NYSDEC Request for PCB Data Collection and Evaluation,  
Northrop Grumman Corporation, Bethpage, New York.

Dear Mr. Scharf:

Northrop Grumman Corporation (NGC) is responding to the request for information on polychlorinated biphenyls (PCBs) that was contained in the New York State Department of Environmental Conservation (NYSDEC) letter of October 25, 2002. It is our understanding that this letter was issued on behalf of the NYSDEC Division of Solid and Hazardous Materials (DSHM) and was prepared in response to the investigation of the Bethpage Community Park and NGC's collection and analysis of samples as part of the disposition of its Plant 1 at Bethpage and Plant 12 in Hicksville. NGC has already responded to the NYSDEC request for inorganic data (i.e., cadmium and chromium) in its letter to NYSDEC, dated February 26, 2003. Our general and specific responses to the October 25<sup>th</sup> letter as it relates to the occurrence and extent of PCBs at our Bethpage, New York site are provided below.

General Response

Over the past decade, NGC has generated a significant amount of groundwater and soil quality data and continues to monitor the occurrence and extent of PCBs in groundwater and soil at and in the vicinity of the Bethpage, New York facility. Since 1991, NGC has undertaken numerous data collection efforts as part of the remedial investigation (RI), along with property de-listing efforts and numerous due diligence studies that have included the collection of soil and groundwater samples for PCB analysis. Most recently, NGC has conducted PCB investigations in the area near its Plant 1 and off-site in the surrounding community (Bethpage Community Park).

In response to the NYSDEC's October 25, 2002 letter, NGC has requested that Arcadis Geraghty & Miller (AG&M) undertake a detailed review of historical records for PCB data. This historical search will focus on on-site data, but will also include available off-

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site data. This effort is currently underway and will be used as the basis for responding to the October 25, 2002 letter and for future decision-making concerning the site groundwater monitoring network. Data identified in the historic database search will be summarized and provided to the NYSDEC when it is complete.

### Specific Responses

This letter has been prepared to respond specifically to Comment No. 6 in the October 25<sup>th</sup> NYSDEC letter, which requested that preceding Comments 1 through 4 of the subject letter be re-directed to also address the occurrence and extent of PCBs at and near the NGC Bethpage, New York site. Therefore, the NYSDEC specific requests for information and data contained in the October 25<sup>th</sup> letter are paraphrased, as needed, in the italicized text below, and are followed by our responses:

NYSDEC Comment 1.

***A summary of all available historical groundwater data for all [PCBs] (...) associated with processes conducted at the site, to the extent it has not already been provided to the NYSDEC. (...) This information should be shown in tables, charts and maps relating the [PCBs] (...) contamination found to be known sources and showing changes in [PCBs] (...) contamination over time.***

Response to Comment 1.

As stated in our "General Response" above, AG&M is currently reviewing records for the Bethpage, New York facility to determine the amount of information on file and the form of documentation (i.e., hard copy, electronic format, reduced data table, or raw laboratory data) as part of a proposal to summarize, evaluate, and manage the PCB data available for the site. Once the information is retrieved from NGC records, it will be reduced and entered into a master database of PCB data (which will supplement the existing database of PCB data collected by AG&M since 1998) that will then be utilized to respond to the NYSDEC's data request. The schedule for production of the database and delivery of the summary work product to the NYSDEC is currently being developed and is contingent on the amount and form of information contained in NGC records. Once developed, the schedule will be provided to the NYSDEC.

NYSDEC Comment 2.

***A discussion of any (...) facilities that may have contributed [PCB] (...) contamination to groundwater at the site.***

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Response to Comment 2.

NGC does not believe that any of its facilities have contributed PCB contamination to groundwater at the site. There are no known incidents (leaks, spills or releases) involving any transformers containing PCBs. The only other equipment that utilized PCBs was the autoclave operation at Plant 3 on the Naval Weapons Industrial Reserve Plant site. PCBs were extensively investigated and are currently undergoing remediation on the NWIRP property, including two dry wells in the vicinity of Plant 3 that are believed to have received PCB spills and releases from the autoclaves. Although groundwater sampling at one dry well did suggest the presence of PCBs, this finding was not confirmed by the analytical results from the filtered samples. These findings have been previously reported to the NYSDEC.

NYSDEC Comment 3.

***A plan to obtain any additional data needed to determine:***

- 1. If cleanup actions at the (...) facilities in Plants 1, 2 and 3 (and any other significant areas identified in 2) were adequate to eliminate, or significantly reduce, the continued input of [PCBs] (...) to site groundwater. (This may require further characterization of the vertical and horizontal extent of known areas of [PCB] (...) contamination.);***
- 2. If existing [PCBs] (...) or plumes are being captured and adequately treated by the groundwater remedial system;***
- 3. If the off-site portion of the chlorinated organic plume also contains [PCB] (...) contamination at levels of concern.***

Response to Comment 3.

As stated in Response to Comment 1, after compilation and evaluation of the historical PCB data, AG&M will prepare a plan of action to address the issues raised in Comment 3. Similar to Comment 1, the schedule for preparation of such a plan will be contingent on the amount and form of data contained in NGC records, and, once prepared, will be submitted to the NYSDEC.

NYSDEC Comment 4.

***Modifications to the long term monitoring plan that are necessary to monitor the [PCB] (...) contamination found at the site. (This will need to be done after the earlier work has been completed).***

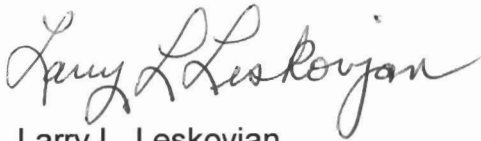
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Response to Comment 4.

The OU2 Groundwater Monitoring Plan (Appendix H to the OU2 Feasibility Study) will be revised to reflect the addition of select wells and/or to add the analysis of PCB analytes, as appropriate, to existing wells monitored. The recommended list of analytes, number of wells to be monitored, and the monitoring schedule will be contingent on our evaluation of the historical data performed as part of our response to Comment 1.

We trust the foregoing responses are satisfactory. Please contact us if you have any questions or comments.

Sincerely,



Larry L. Leskovjan  
Manager  
Environmental, Safety, Health & Medical

cc: James Colter, NAVFAC  
Mike Tone, Nixon Peabody  
David Stern, Arcadis Geraghty & Miller  
Roger Murphy, NYSDEC  
Larry Rosenmann, NYSDEC  
Henry Wilkie, NYSDEC