



Mr. Steven Scharf, P.E.
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7015

Subject:

Bifurcation of Remedial Investigation Report, Former Grumman Settling Ponds,
(Operable Unit 3 – Bethpage Community Park), Bethpage, New York.

Dear Steve:

ARCADIS, on behalf of Northrop Grumman Systems Corporation (Northrop Grumman), has prepared this letter to advise the New York State Department of Environmental Conservation (NYSDEC) of its plan to bifurcate the Remedial Investigation (RI) Report for the Operable Unit 3 (OU3) project into two parts covering two sub-areas. This approach has been previously discussed with you. Northrop Grumman believes that management of the RI for OU3 in this manner will serve to further optimize the overall project schedule, and the outcome will be beneficial for all parties.

As NYSDEC is aware, Northrop Grumman is currently undertaking the Remedial Investigation/Feasibility Study (RI/FS) pursuant to an Order on Consent for the Site (which is defined as the Bethpage Community Park) and is currently developing Interim Remedial Measures (IRMs) to address Site-related soil gas and groundwater. As the OU3 RI has progressed, ARCADIS has developed and refined a conceptual site model (CSM) and has used the CSM, in part, to direct the focus of the RI to specific media of concern. In accordance with the current CSM, the environmental media of concern are soil, soil gas, and groundwater. Based on the data collected to date, the RI for Sub-Area 1 (as defined below) is expected to be completed within the next few weeks. However, the groundwater RI in Sub-Area 2 (as defined below) will likely require significantly more time to complete.

Imagine the result

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April 25, 2007

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Our ref:
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ARCADIS

Mr. Steve Scharf
NYSDEC
April 25, 2007

It is with this understanding that ARCADIS is planning to bifurcate the OU3 RI Report. For this bifurcation, ARCADIS proposes that two OU3 sub-areas be defined, as follows:

Sub-Area 1: This sub-area will consist of the Bethpage Community Park property, the former Grumman Plant 24 Access Road property, and the area south of the former Grumman Plant 24 Access Road, to include properties abutting the north side of Sycamore Avenue.

Sub-Area 2: This sub-area will consist of areas south of Sycamore Avenue in the hydraulically downgradient direction.

Bifurcation of the OU3 RI in this manner will allow the preparation of an RI Report that addresses Sub-Area 1 without waiting for completion of the RI for Sub-Area 2. Specifically, ARCADIS will prepare an initial RI Report, which would include the analytical data and interpretations that are related to Sub-Area 1, plus all currently available and validated analytical data from Sub-Area 2 (Note: the Sub-Area 2 data would not be interpreted in this version of the RI Report). Based on the assumption that the Sub-Area 1 RI data collection will be complete and objectives will be met by the end of April 2007, ARCADIS expects that the initial RI Report would be submitted to NYSDEC by the end of October 2007. With NYSDEC approval of the initial RI Report, the remedial alternative screening and selection process for Sub-Area 1 could be initiated earlier than otherwise possible. Once the RI within Sub-Area 2 has been completed, the initial RI Report would be supplemented to incorporate the outstanding Sub-Area 2 data and data interpretations, thus creating the desired comprehensive RI Report for the entire OU3.

ARCADIS

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Accordingly, absent any NYSDEC concerns or comments to the contrary, ARCADIS plans to prepare and submit the RI Report as described. Please contact us if you have questions or comments.

Sincerely,

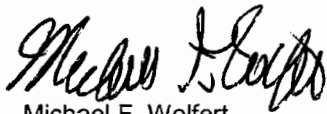
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