



STATE OF NEW YORK
DEPARTMENT OF HEALTH

Flanigan Square 547 River Street Troy, New York 12180-2216

Richard F. Daines, M.D.
Commissioner

Wendy E. Saunders
Chief of Staff

March 7, 2008

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

Re: Remedial Investigation Report
Operable Unit 3 (Former Grumman Settling Ponds)
Northrop-Grumman Site
Site ID #130003A
Bethpage, Nassau County

Dear Mr. Scharf:

I reviewed the February 2008 Remedial Investigation Report (Site Report), Operable Unit 3 (former Grumman Settling Ponds) for the Northrop Grumman site in Bethpage, Nassau County. I have the following comments:

1. A new ice rink with an attached office is being built in the area of the former ice rink. According to the Report, elevated concentrations of Freon 12, 22 and trichloroethene (TCE) are in the shallow soil gas around the area of the new ice rink and office. Unless specific measures have been taken (eg. Placement of a SSDS, vapor-barrier(s)) and documented, the new building needs to be evaluated to determine if indoor air is impacted by vapor intrusion from either Freon or TCE.
2. The soil vapor extraction (SVE) system proposed to address the soil source contamination in the southwest area of the Park is in place and functioning as of February 2008. This system may be able to address the soil vapor contamination found under affected homes that are downgradient of the site. If the SVE system is to be used in this capacity, what procedures are in place to protect these homes if the system malfunctions or is taken off-line for scheduled maintenance? What is the plan for monitoring soil vapors and groundwater to verify that the SVE system is, in fact, accomplishing its intended remedial action and reducing VOCs from both media?
3. The Freon contamination (Freon 12 and Freon 22) in the groundwater is significant and needs to be addressed under the site-related groundwater remedy.

4. The Report seems to state than on-site soils will remain as a continuing source of VOCs, metals and PCB contamination. If soil excavation was to remediate the source areas, and the Town of Bethpage conducted more extensive soil excavation than was recommended by either the NYSDEC or the NYSDOH, is there contamination remaining and what is planned for the contamination remaining on-site? Institutional controls and/or a Management Plan are not mentioned in this report as means for controlling exposure to these contaminants.
5. Soil vapor intrusion (SVI) investigation has begun for the downgradient homes and for the Bethpage High School. To date, none have been impacted by vapor intrusion into homes, but subslab contamination was detected in some homes at levels that require continued monitoring. This continued monitoring of downgradient homes should be conducted, preferably once during the heating season, which for Long Island, runs from December 1 through March 1.
6. The Bethpage Community Park well (depicted in Figure 2-1) is no longer in use for drinking water, irrigation or other human exposure purposes? Can or will this well be used for pump and treat uses to control the VOC/Freon groundwater contamination plumes?
7. Iron and manganese are detected at concentrations in groundwater that can negatively affect the function of the SVE system in place to address VOC contamination. Since iron/manganese fouling can cause a system to be taken off-line or limit its capacity to function correctly, what procedures are in place to correct for this situation?

If you have any questions about this review, please contact me at (518) 402-7880

Sincerely,

Jacquelyn Nealon

Jacquelyn Nealon
Public Health Specialist III
Bureau of Environmental
Exposure Investigation

cc: G. Litwin/D.Miles/ File
C. Vasudevan/J. Swartwout - NYSDEC Central Office
W. Parish – DEC, Region 1
R. Weitzman/J. DeFranco - NCDOH
B. Devine - MARO