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Supplement to the Remedial Investigation Report (Site Area)
Operable Unit 3 (Former Grumman Settling Ponds),
Bethpage, New York.
NYSDEC Site # 1-30-003A

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January 2009

In accordance with the New York State Department of Environmental Conservation (NYSDEC)-approved Remedial Investigation/Feasibility Study (RI/FS) Work Plan for the Operable Unit 3 (OU3) (Former Grumman Settling Ponds) site (Site), ARCADIS is submitting this Supplement to the Remedial Investigation (RI) Report (Site Area), (in addition to the previously submitted response letter to the NYSDEC of August 26, 2008) to respond to the NYSDEC comment letter of May 22, 2008. This report is intended to work in conjunction with the RI Report. Provided below are references to section and page numbers that correspond to the RI Report, followed by the revisions to the paragraph(s) specified.

Section 1, Introduction, Page 1, Second Bullet should read:

- Develop and evaluate alternatives for remedial action to prevent, mitigate, or otherwise respond to or remedy a release or potential release of COCs at or from the Site by conducting an FS.

Section 1.1.2, Site History, Page 3, the first three paragraphs should read:

This is a summary of the history for the area comprising what is now known as the Town of Oyster Bay Bethpage Community Park (the "Property" or "Park"). The information regarding the activities that may have taken place at the Property is historical in nature and therefore incomplete and subject to change if and when additional and/or different information becomes available.

The Property is believed to have been primarily farmland until the 1940s. Around that time, the Property was purchased by Grumman Aircraft Engineering Corporation, a predecessor company of Northrop Grumman Systems Corporation. The Property was not used for actual manufacturing operations undertaken at the Bethpage Facility, and no buildings were erected on the property by Grumman Aircraft Engineering Corporation.

The Property was donated by Grumman Aircraft Engineering Corporation to the Town of Oyster Bay in October of 1962. Shortly thereafter, the Park was constructed on the Property by the Town.

It is generally believed that during the period between 1950 and late 1962 that Grumman Aircraft Engineering Corporation owned the Property, wastewater treatment sludge from the Grumman Aircraft Engineering Corporation Plant 2 Industrial Wastewater Treatment Facility may have been transported to an area in the

southwestern part of the Property and placed in drying beds. The wastewater treated at the Plant 2 Industrial Wastewater Treatment Facility resulted from metal finishing operations conducted at both Plant 2 and the Naval Weapons Industrial Reserve Plant ("Plant 3"), which was owned by the U.S. Navy and operated by Grumman Aircraft Engineering Corporation. The southwestern portion of the Property was enclosed by a chain-link fence, which was secured by a locked gate. It is also believed that used rags generated during the wipe-down of painting operations located in Plants 2 and 3 may have been transported to the Property.

It is also believed that an area in the southwestern portion of the Property was utilized as a fire training area where waste oil and jet fuel may have been ignited and extinguished, and that the requirement to develop, operate and maintain an on-site fire fighting force ("Crash Crew"), including a fire training program may have been imposed on Grumman Aircraft Engineering Corporation by the U.S. Navy.

Northrop Grumman Systems Corporation does not have any direct information regarding the operations conducted by the Town of Oyster Bay subsequent to the transfer of the Property to the Town in 1962.

Section 4.2.1.1, Presence and Nature of Fill Deposits, Southwest Park Region, Page 36, 3rd paragraph should read:

A second major type of fill material encountered at the Park is present in the northern portion of the southwest Park region. This material is predominantly a blue silt and clay like material, which is present from approximately 1 ft bls to a depth of 22 ft bls. The location, depth from land surface, and thickness of this unit are shown on Figure B2-2 (Appendix B). The material is present beneath most of Area "A", Area "B" and Area "C" and the northwest portion of Area "D". The composition of this material along the western boundary of Area "A" (near Borings B-57 and B-58) is slightly different from the material present in other portions of the Park. In this area, the material varied more in color, from black to blue to gray to green, and its density was less with higher moisture content than the blue material discussed above. In the central and western region of Area "A", the top of the blue material varies from 5 to 16 ft bls and its thickness varies from greater than 1 ft to over 6 ft. In Area "A", the material is interbedded with sand. In Area "B", the material was primarily encountered in the western and eastern portions of the area. It should be noted that approximately 75 percent of the eastern portion of Area "B" was excavated to a depth of up to 20 ft bls during the Town of Oyster Bay IRM program. In the western portion of Area "B", the top of the material ranges between 6 and 9 ft bls and is up to 5 ft thick. In the eastern

portion of the area, the top of the material was encountered between 1 and 6 ft bls with a thickness of between 0.5 and greater than 8 ft. Samples of this material were collected during the RI, the results of the analyses performed are provided in Section 5.

Section 5.3.3.4, Polychlorinated Biphenyls, Page 56, a 3rd paragraph was added to the section as follows:

The extent of PCB exceedances on the former Plant 24 Access Road is fully discussed in the Plant 24 Access Road Site Bethpage Facility, PCB Investigation/ Delineation Program (July 2001), see Appendix B supplement.

Section 6.1, Constituents of Concern, Page69, the list of constituents of concern in one or more media is as follows:

Volatile Organic Compounds (VOCs)

Chlorinated Ethenes

- Trichloroethene
-cis-1,2-Dichloroethene
- Vinyl chloride

Aromatic Hydrocarbons

-Ethylbenzene
-Toluene
-Xylenes

Polycyclic Aromatic Hydrocarbons

Benzo(b)fluoranthene
Benzo(a)anthracene
Benzo(a)pyrene
Indeno(1,2,3-cd)pyrene

Metals

Cadmium
Chromium

Other

-Chlorodifluromethane

Section 7.2, Presentation of Conceptual Site Model, Page 82, the 2nd paragraph should read:

The Site Area was viewed in this manner because the data suggest that past activities varied among these three regions (refer to Section 1.1.2 for park history). The data indicate that each region contains one or more sources of COCs, exhibits a distinct profile of COCs detected (i.e., type of constituent) as well as distinct physical characteristics (i.e., geology and hydrogeology) that directly affect the location, distribution, and concentration of COCs.

Section 7.5, Former Plant 24 Access Road, Page 86, the 4th paragraph should read:

PCBs and, secondarily, metals occur in the region in the unsaturated zone, with PCB concentrations above 10 mg/kg from land surface to a maximum depth of 7 ft bls. PCB concentrations are generally higher at the eastern section of the unpaved portion of the Access Road. A full discussion of PCB distribution on the Former Plant 24 Access Road is provided in Dvirka and Bartilucci's (D&B) Plant 24 Access Road Site Bethpage Facility, PCB Investigation/Delineation Program (July 2001), see Appendix B supplement.

Section 9.4, Conceptual Site Model, Page 97, the second bullet should read:

- The data suggests that past activities varied among the southwest Park region, east-central Park region and the Former Grumman Plant 24 Access Road. Each region appears to contain one or more sources of COCs, exhibits a distinct profile of COCs detected as well as distinct physical characteristics that directly affect the location, distribution, and concentration of COCs.

Figure 3-1, Note No. 4 have been revised

Provided on the enclosed CD "Supplement to Appendix B":

Figures and tables from the Dvirka and Bartilucci *Plant 24 Access Road Site Bethpage Facility, PCB Investigation/Delineation Program* dated July 2001and PCB soil data not previously provided along with figures showing the sample locations.