

Meeting Minutes
Northrop Grumman Corporation, OU3 Site Area Focused Feasibility Study
February 11, 2010
Meeting 11

Attending: Kent Smith and John Cofman (NG); Steve Scharf and John Swartwout (NYSDEC); Mike Wolfert (ARCADIS); Carol Henry (EMAGIN)

Purpose of the Call: To discuss NG's planned responses to NYSDEC's comment letter dated 12/07/09 regarding the Site Area FFS, and attempt to resolve all outstanding issues

Action Items:

1. NG – send revised HHRA language to NYSDEC so they can send to NYSDOH for review
2. NG – evaluate if groundwater IRM achieves full containment
3. NYSDEC – discuss Sycamore Ave chromium data with NYSDOH for clarification
4. NYSDEC – issue letter regarding Study Area (off-site) RI
5. NG – review document NYSDEC sent regarding ozone sparging
6. NG – revise minutes from 1/14/10 call to reflect NYSDEC edit

Opening Comments:

NG:

- NG is interested in providing an approvable FFS in short order. Therefore, the call will be specific to provide NYSDEC with a clear understanding of how NG will respond to the comment letter and rewrite the Site Area FFS to reflect decisions made over the past few months during calls and meetings with NYSDEC.
- The on-site remedy is part of a much bigger remedy that includes the off-site plume and any selected remedy must be cost-effective as well as reasonable and technically appropriate.

NYSDEC:

- NYSDEC agrees – project is complicated, but NG needs to complete the alternatives and finalize the on-site FFS, and move forward with the off-site FFS.

Comment-by-comment review of NYSDEC's 12/7/09 letter

NG provided their intended responses to NYSDEC's comments. These minutes are not intended to revisit each comment, given that responses will be provided within a month, but rather provide the general decisions / conclusions that were reached:

1. References made in the FFS to the Human Health Risk Assessment (HHRA) will focus on how the HHRA supports the recommended remedy in concluding that the remedy is protective of human health. NYSDEC has no objection to this approach if NYSDOH doesn't. NYSDEC asked that NG send the HHRA language in advance of the revised FFS so NYSDOH could review; NG agreed.
2. NG will not break down impacted soil by volumes for VOCs, metals and PCBs, as agreed to during the 1/14/10 strategic issues teleconference.
3. Regarding NYSDEC's concern about the presence of chromium, NG will point out that its recommended remedy includes removing 98% of the blue green material in the top 10 feet of soil (37% of the total volume of all blue green material).
4. NG will add discussion of future property use, which is limited by language in the property transfer agreement to use as a community park.

5. Since NG does not consider the blue-green material or PCBs to be sources, the FFS will not include a separate source area remedial action objective (RAO) for these COPCs; rather, the soil RAO will continue to address them. Also, the recommended remedy will include removal/treatment of blue-green material to 10 feet (see item 3 above) and PCBs (when > 50 ppm and in the top 6 or 10 feet of soil, depending on the depth of utilities); these actions will be described under sections / tables referring to soil alternatives (specifically, S-P3), not sources. NYSDEC continues to consider the blue green material and PCBs to be sources, and they will include this opinion in their approval letter for the FFS. NYSDEC expressed their opinion that if NG is excavating soil and encounters blue-green material, the excavation should continue beyond the intended 6 or 10 feet to remove this material.
6. NG will modify remedial goals and RAOs, and will add the definition of feasible to this section as a lead-in to a discussion of cost-effectiveness.
7. NG had planned to reference Approach 4 of NYSDEC Commissioner's Policy on Soil Cleanup Guidance in its discussion of the recommended remedy; NYSDEC stated that using this approach is not an option. There remained some uncertainty regarding how NG will address the concept of meeting SCOs, and NYSDEC indicated that NYSDOH will weigh in on the RAOs.
8. Regarding remedial alternatives, NG will prepare a table with a listing and description of each alternative (e.g., S-P1, SA-2), and will add the PCB-presumptive remedy to the list of alternatives (as agreed to during the 11/12/09 call) as the new S-P4 (the current S-P4 will become S-P5).
9. NG will not add any discussion of chromium in Sycamore Avenue soils, unless data gaps are closed. NYSDEC will contact NYSDOH for clarification.
10. Regarding the Bethpage Community Park recharge basin, NG considers any required sampling or actions to be the Town's responsibility since there were no stormwater runoff structures when NG occupied the property. NYSDEC does not agree with this position.
11. Regarding the capture zone from the groundwater IRM, NYSDEC asked if the recovery wells were capturing the entire plume. NG will evaluate.
12. NG disagrees with most of NYSDEC's comments relating to costs since generally Long Island costs tend to be substantially higher than other areas of the state and unions have a significant impact. NG will consider some suggestions such as those relating to construction and project management estimates.

NG-recommended remedy

1. NG asked if NYSDEC saw any obstacles to the selection of its recommended remedy. NYSDEC responded that much progress has been made to closing gaps between NG's and NYSDEC's opinions on necessary actions when NG added removal of some blue-green material and PCBs to its recommended remedy. NYSDEC is not sure, however, that the selected depth of treatment / excavation is sufficient. There are many other factors that the selection committee considers that will enter into the decision, but NYSDEC does believe that the recommended remedy is "close" to what would likely be selected.
2. NG expressed some concern that the cost effectiveness of the Site Area (on-site) remedy would not be viewed in the context of part of a much larger, costlier remedy that would include the selected Study Area (off-site) remedy.
3. NYSDEC will structure the ROD with flexibility to allow for use of alternative technologies, including ozone sparging. NYSDEC sent an email before the call with an article on the technology and requested that NG consider it. NG agreed.

NYSDEC review of the Off-site RI

Essentially complete – NYSDEC will get letter out shortly.

Off-Site FFS status

NG is working to meet the May 2010 deadline.

Project Schedule

1. NG will submit responses to the 12/7/09 comment letter within 30 days of this call, and will submit a revised Site Area (on-site) FFS within 60 days of the response letter submittal, which is close to the submittal date for the Study Area (off-site) FFS.
2. Given this schedule, NYSDEC will combine the on-site and off-site remedies for a single PRAP, public meeting, and ROD.

Meeting Minutes from 1/14/10 Teleconference

NYSDEC had one correction – NG will call for clarification and reissue the minutes.

Closing Comments

See action items.