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ENVIRONMENT

Subject:

System Start-up Work Plan, Northrop Grumman Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds) Bethpage, New York.

Dear Mr. Scharf:

ARCADIS is submitting this <u>System Start-up Work Plan</u> on behalf of the Northrop Grumman Systems Corporation (Northrop Grumman). This Work Plan describes the proposed Operable Unit 3 (OU3) Groundwater Interim Remedial Measure (GW IRM) system start-up program. Figure 1 depicts the site location (Site is defined as the Bethpage Community Park and former Northrop Grumman Plant 24 Access Road, which abuts the Park to the south and west).

The objectives of this System Start-up Work Plan are:

- Describe the three phases of the system start-up program and the tentative schedule for system start-up.
- Present the system and groundwater sampling and monitoring programs associated with system start-up, which includes the long-term sampling and monitoring programs as part of the continuous operation phase.

SYSTEM START-UP PROGRAM

The GW IRM System Start-up Program consists of the following three phases:

- One-hour pilot-test.
- Intermittent operation (system shakedown and alarms/controls testing).
- Continuous operation.

In summary, A New York State Department of Environmental Conservation (NYSDEC)-required, 1-hour pilot test will be performed prior to any water being discharged to the Nassau County Department of Public Works (NCDPW) recharge basins (NCDPW Basins). Once the discharge of treated water to the NCDPW Basins is allowed, there will be a brief (approximately one week) period where the

Date:

May 6, 2009

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NY001491.0000.00012

system will be operated intermittently to shakedown any potential problems with the groundwater recovery system and the treatment plant. Upon completion of the system shakedown phase, the system will be operated continuously.

Schedule

Based on available information, the tentative schedule for the GW IRM System Startup is:

- 1-hr pilot test: scheduled to be performed Thursday May 7, 2009.
- Intermittent Operation; will start on (or about) Tuesday May 19, 2009 (The
 day after a NC board meeting where the proposed discharge agreement
 between NG and NC is scheduled to be voted on. Schedule assumes that
 the proposed agreement is confirmed/accepted.)
- Continuous Operation: will start when the system is checked out/shaken down and deemed ready for continuous operation (expected to be during the week starting May 25, 2009).

One-Hour Pilot Test

The NYSDEC requires that a one-hour pilot test be performed prior to the discharge of treated water to the NCDPW basins to confirm that the treatment system (air stripper and bag filters) will reduce site-related compounds to levels below allowable discharge limits.

During the pilot test, the GW IRM will be operated to simulate normal operation for a period of one hour. At the end of the one hour period, confirmatory samples will be collected.

Specifically; groundwater will be pumped from the four remedial wells (RW-1, RW-2, RW-3, and RW-4) at their respective design pumping rates of 30, 75, 75, and 30 gallons per minute (gpm) to the treatment plant for treatment. The groundwater will be treated by the air stripper, to remove volatile organic compounds (VOCs) to acceptable levels, and then treated by the bag filters, to remove particulate matter. During the one-hour pilot test, the treated water will be temporarily stored in a 20,000-gallon storage tank. The treated water will ultimately be discharged to the NCDPW sanitary sewer system per Northrop Grumman's existing agreement with the NCDPW. The air stripper off-gas will be pumped through all four of the treatment emissions control units (ECUs), where the VOCs will be removed from the vapor stream, prior to discharge to the atmosphere, either by the vapor phase granular activated carbon (GAC) or the potassium permanganate- impregnated zeolite (PPZ).

Intermittent and Continuous Operation

As noted above, once NYSDEC and NCDPW approvals have been received, the system will be operated intermittently to allow for system alarms, instrumentation, and controls to be tested to ensure proper operation prior to continuous operation of the plant. Once the intermittent phase of operation is complete, the system will be operated continuously.

SAMPLING AND MONITORING PROGRAMS

The sampling and monitoring programs for the system start-up and for continuous operation are summarized on Tables 1 and 2 (attached). Table 1 presents the sampling and monitoring associated with the treatment plant to ensure proper system performance and compliance associated with the plant effluents. Table 2 presents the groundwater monitoring program, implemented for assessing the effectiveness of the GW IRM to meet project objectives. The locations of the groundwater monitoring wells and piezometers are shown on Figure 1 and the system sampling and monitoring locations are schematically represented, where possible, on Figure 2.

System Start-up (one-hour pilot test)

During the one-hour pilot test, the following grab samples will be collected, and analyzed for the parameters shown, at the end of the one-hour pilot test:

- Plant Influent (water): pH, VOCs, Iron, and Mercury
- Air Stripper Effluent (water): Iron
- Plant Effluent (water): pH, VOCs, Iron, and Mercury
- Plant Effluent (air): VOCs

The water samples will be submitted to a state-certified laboratory and analyzed for the parameters listed above, except for pH, which will be measured in the field. Samples will be collected and analyzed in accordance with the methods specified in Table 1.

The effluent air sample will be submitted to a state-certified laboratory, and analyzed in accordance with the methods and procedures specified in Table 1.

Continuous Operation

The sampling program (location, frequency, parameter, and analytical method) for the treatment plant is provided in Table 1. In summary, the sampling frequency is split into the following three sections:

- Short-term (first month)
- Short-term (next five months)

- Long-term (after the first six months)

This allows selected samples to be collected more frequently during the initial stages of operation to confirm adherence to project discharge requirements. For example, during the first month; the plant effluent (water) is sampled on Days 1 and 3, then weekly thereafter.

The system water samples will be collected and analyzed in accordance with the methods and procedures specified in Table 1.

The groundwater monitoring program is provided in Table 2. Water-levels will be measured to the nearest hundredth of a foot (.01 ft) (using a decontaminated water level indicator) in the wells in the hydraulic measurement network (Table 2), consistent with NYSDEC-approved OU3 RI/FS procedures.

Groundwater samples will be collected and analyzed in accordance with the procedures and methods specified in Table 2.

We would appreciate NYSDEC written approval of this work plan as soon as possible. If you have any questions or comments, please feel free to contact us.

Sincerely,

ARCADIS

William S. Wittek, PE Senior Engineer

Enclosures

Copies:

John Cofman, Northrop Grumman Kent A. Smith, Northrop Grumman Gary Litwin, NYSDOH Robert Weitzman, NCDOH Peter A. Scully, NYSDEC Region 1 Rosalie K. Rusinko, Esq., NYSDEC File Repository (Bethpage Public Library)

Table 1. Treatment System Mointoring Program, Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds), Northrop Grumman Systems Corporation, Bethpage, New York. (1)

		Frequency					
Sample Location/Instrument (1)	Parameter (Method) (2)	Short-Term (Long-Term ⁽⁴⁾	SCADA			
		(first month)	(five month period following first month)		Data Acquisition		
Water Samples (5)							
Remedial Well 1 (WSP-1)	VOCs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1)	Bi-Weekly Bi-Weekly	Quarterly Annually	Quarterly Annually	NA NA		
Remedial Well 2 (WSP-2)	VOCs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1)	Bi-Weekly Bi-Weekly	Quarterly Annually	Quarterly Annually	NA NA		
Remedial Well 3 (WSP-3)	VOCs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1)	Bi-Weekly Bi-Weekly	Quarterly Annually	Quarterly Annually	NA NA		
Remedial Well 4 (WSP-4)	VOCs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1)	Bi-Weekly Bi-Weekly	Quarterly Annually	Quarterly Annually	NA NA		
Air Stripper Influent (WSP-5)	VOCs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1)	1-hr ⁽⁶⁾ ; Days 1, 3, & Weekly 1-hr ⁽⁶⁾ ; Days 1, 3, & Weekly	Monthly Monthly	Quarterly Quarterly	NA NA		
Air Stripper Effluent (WSP-6)	Iron (NYSDEC ILM 4.1)	1-hr ⁽⁶⁾ ; As Needed	As Needed	As Needed	NA		
vocs (NYSDEC 2000 OLM 4.2) Iron (NYSDEC ILM 4.1) ph (field)		1-hr ⁽⁶⁾ ; Days 1, 3, & Weekly 1-hr ⁽⁶⁾ ; Days 1, 3, & Weekly 1-hr ⁽⁶⁾ ; Days 1, 3, & Weekly	Monthly Monthly Monthly	Monthly Monthly Monthly	NA NA NA		
<u>Air Samples</u> (7)							
Air Stripper Effluent/ECU-1 Influent (VSP-1)	VOCs (TO-15 Modified)	Monthly	Monthly	Quarterly	NA		
ECU-1 Effluent/ECU-2 Influent (VSP-2)	VOCs (TO-15 Modified)	As Needed	As Needed	As Needed	NA		
ECU-2 Effluent/ECU-3 Influent (VSP-3)	VOCs (TO-15 Modified)	As Needed	As Needed	As Needed	NA		
ECU-3 Effluent/ECU-4 Influent (VSP-4)	VOCs (TO-15 Modified)	As Needed	As Needed	As Needed	NA		
Total Effluent (VSP-5)	VOCs (TO-15 Modified)	Monthly	Monthly	Quarterly	NA		

Table 1. Treatment System Monitoring Program for Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds, Operable Unit 3 (Former Grumman Settling Ponds), Bethpage, New York.

_		Frequency					
Sample Location/Instrument (1)	Parameter/Method (2)	Short-Term	Long-Term (4)	SCADA			
		(first month)	(five month period following first month)		Data Acquisition		
Water Flow Measurements		()			_		
Remedial Well RW-1 (FT - 110)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-2 (FT - 120)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-3 (FT - 130)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-4 (FT - 140)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Combined Influent (FR - 200)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
System Effluent (FT-700)	Flow rate (gpm + total gal.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
<u>Air Flow Measurements</u>							
Air Stripper Effluent (FT-500)	Flow rate (SCFM)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Water Pressure Measurement	<u>s</u>						
Remedial Well RW-1 (PT - 110)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-2 (PT - 120)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-3 (PT - 130)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Remedial Well RW-4 (PT - 140)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
System Effluent (PT-700)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Weekly	Weekly	Continuously		
Air Temperature & Relatively	Humidity Measurements						
Air Stripper Effluent (TI-500)	Temperature	Weekly	Weekly	Weekly	Continuously		
ECU Mid-Train (TI-501)	Temperature	Weekly	Weekly	Weekly	NA		
Effluent (TI-601)	Temperature	Weekly	Weekly	Weekly	NA		

Table 1. Treatment System Monitoring Program for Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds, Operable Unit 3 (Former Grumman Settling Ponds), Bethpage, New York.

		Frequency						
Sample Location/Instrument (1)	Parameter/Method (2)	Short-Term	Long-Term (4)	SCADA				
		(first month)	(five month period following first month)		Data Acquisition			
Air Pressure Measurements								
Air Stripper Effluent (PT-500)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	Continuously			
ECU #1 Influent (PI-501)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	NA			
ECU #2 Influent (PI-502)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	NA			
ECU #3 Influent (PI-503)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	NA			
ECU #4 Influent (PI-504)	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	NA			
System Effluent	Pressure (i.w.g.)	(Daily -1st week) Weekly	Monthly	Quarterly	NA			

Notes:

- 1 Refer to Figure 2 for diagram showing referenced sample locations. Sampling locations labeled, instrumentation is shown but not labeled.
- 2. Parameters/methods may be modified based on review of short-term and/or long-term testing results. Parameters shown in **Bold** indicate parameters that require NYSDEC notification/approval prior to change in monitoring schedule.
- 3. Short-term schedule is tentative. Modification may be required/recommended based on the results of start-up and performance testing.
- 4. Long-term schedule is tentative. Modification may be required/recommended based on the results of short-term testing or water quality trends.
- Water samples will be collected in accordance with the methods described in "Operable Unit 2 Groundwater Remedy, Operation, Maintenance, and Monitoring Plan, Northrop Grumman and NWIRP Sites, Bethpage, New York, Volume 1, dated 3 December 2002" and analyzed in accordance with the methods and procedures described in "Remedial Investigation/Feasibility Study Work Plan, Former Grumman Settling Ponds (Operable Unit 3 Bethpage Community Park), Bethpage, New York, revised March 8, 2006" (OU3 RI/FS Workplan).
- 6. Per NYSDEC request, a 1-hr pilot test will be performed during system shake-down. 1-hr pilot test samples will also be analyzed for mercury.
- 7. Air samples will be collected and analyzed in accordance with methods described in "Operation, Maintenance, and Monitoring Manual, Soil Gas Interim Remedial Measure, Operable Unit 3 Former Grumman Settling Ponds, Bethpage, New York, dated January 2009".

Additional air samples will be collected to help calculate media usage rates and to help determine media changeout frequencies.

NA Not applicable.

ECU Emissions control unit.

VOCs Volatile organic compounds (TCL VOCs, including Freon 12 and Freon 22, assuming the appropriate laboratory standard is available at the time of the analysis).

gal. Gallons.

gpm Gallons per minute. i.w.g. Inches water gauge

NYSDEC New York State Department of Environmental Conservation.

EPA U.S. Environmental Protection Agency.

TCL Target Compound List

SCADA Supervisory Control And Data Acquisition

Table 2. Groundwater Monitoring Program, Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds), Northrop Grumman Systems Corporation, Bethpage, New York. (1,2)

							MONITORING ACTIVITY				
	Well	Depth to	o Screen	Screen	Well	Well					
Well ID	Diameter	Тор	Bottom	Length	Depth	Materials	Water	W	ATER QUALITY (4)		
	(inches)	(ft bls)	(ft bls)	(ft)	(ft)		Levels (3)	VOC	Cd/Cr/Hg	Fe/Mn	
Monitoring Well											
BCPMW-1	2	50	65	15	65	Sch. 40 PVC	Quarterly	Baseline	Baseline		
BCPMW-2	2	60	75	15	75	Sch. 40 PVC	Quarterly	Baseline	Baseline	Baseline	
BCPMW-3	2	59	74	15	74	Sch. 40 PVC	Quarterly	Baseline	Baseline	Baseline	
BCPMW-4-1	4	45	65	20	70	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Annual	Baseline	
BCPMW-4-2	4	68.5	83.5	15	88.5	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Annual	Baseline	
BCPMW-4-3	4	115	125	10	130	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Annual	Baseline	
BCPMW-5-1	4	50	65	15	70	Sch. 80 PVC/ SS	Quarterly	Baseline	Baseline	Baseline	
BCPMW-6-1	4	88.5	98.5	10	103.5	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
BCPMW-6-2	4	133	143	10	148	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
BCPMW-7-1	4	90	100	10	105	Sch. 40 PVC	Quarterly	Baseline/Semiannual (5)	Baseline/Ann		
B24MW-2	2	54	74	20	74	PVC	Quarterly	Baseline/Annual	Baseline		
B24MW-3	2	55	70	15	70	PVC	Quarterly	Baseline/Annual	Baseline		
B30MW-1	2	57	72	15	72	PVC	Quarterly	Baseline/Annual	Baseline		
MW-200-1	4	85	95	10	100	Sch. 40 PVC/ SS	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
MW-201-1	4	70	80	10	85	Sch. 40 PVC/ SS	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
MW-202-1	4	125	135	10	140	Sch. 40 PVC/ SS	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
MW-203-1	4	103	113	10	118	Sch. 40 PVC/ SS	Quarterly	Baseline/Semiannual (5)	Baseline/Annual		
Remedial Wells	(6)										
RW-01	8	108	128	20	134	Sch. 80 PVC/SS	Quarterly	Baseline/Quarterly	Baseline/Quarterly		
RW-02	6	84	104	20	104	Steel/SS	Quarterly	Baseline/Quarterly	Baseline/Quarterly		
RW-03	8	84	104	20	107	Sch. 80 PVC/SS	Quarterly	Baseline/Quarterly	Baseline/Quarterly		
RW-04	8	110	130	20	133	Sch. 80 PVC/SS	Quarterly	Baseline/Quarterly	Baseline/Quarterly		

Table 2. Groundwater Monitoring Program, Groundwater Interim Remedial Measure, Operable Unit 3 (Former Grumman Settling Ponds), Northrop Grumman Systems Corporation, Bethpage, New York. (1,2)

								MONITORING ACTIVITY			
	Well	Depth t	o Screen	Screen	Well	Well					
Well ID	Diameter	Тор	Bottom	Length	Depth	Materials	Water		WATER QUALITY (4)		
	(inches)	(ft bls)	(ft bls)	(ft)	(ft)		Levels (3)	VOC	Cd/Cr/Hg	Fe/Mn	
Piezometers											
PZ-01a	2	60	65	5	68	Sch. 40 PVC	Quarterly				
PZ-01b	1	80	85	5	88	Sch. 40 PVC	Quarterly				
PZ-01c	1	130	135	5	138	Sch. 40 PVC	Quarterly				
PZ-02a	2	60	65	5	68	Sch. 40 PVC	Quarterly				
PZ-02b	1	80	85	5	85	Sch. 40 PVC	Quarterly				
PZ-02c	1	130	135	5	138	Sch. 40 PVC	Quarterly				
PZ-03	1	80	85	5	88	Sch. 40 PVC	Quarterly				
PZ-04	1	80	85	5	88	Sch. 40 PVC	Quarterly				
PZ-05a	2	65	70	5	74	Sch. 40 PVC	Quarterly				
PZ-05b	1	110	115	5	117	Sch. 40 PVC	Quarterly				
PZ-06a	2	65	70	5	72	Sch. 40 PVC	Quarterly				
PZ-06b	1	90	95	5	97	Sch. 40 PVC	Quarterly				
PZ-07a	2	65	70	5	72	Sch. 40 PVC	Quarterly				
PZ-07b	1	113	118	5	120	Sch. 40 PVC	Quarterly				

Notes and Abbreviations

- Water samples will be collected and analyzed in accordance with the method and procedures described in "Remedial Investigation/Feasibility Study Work Plan, Former Grumman Settling Ponds (Operable Unit 3 - Bethpage Community Park), Bethpage, New York, revised March 8, 2006" (OU3 RI/FS Workplan).
- 2. Approximate locations of the wells and piezometers in the OU3 Groundwater IRM Monitoring Program are shown in Figure 1.
- Water Levels will be measured in all wells/piezometers during the baseline monitoring event. Water levels will be measured in accordance with the procedures
 presented in the Field Sampling Plan in the OU3 RI/FS Workplan.
- 4. VOC: TCL VOCs using NYSDEC ASP 2000 Method OLM 4.2. with Freon 12 and 22
 - Cd/Cr: Cadmium and Chromium using USEPA Method ILM 4.0, both total and dissolved; Hg: Mercury will only be analyzed for samples collected during the baseline monitoring.
 - Fe/Mn: Iron and Manganese using USEPA Method ILM 4.0, both total and dissolved
- 5. Semiannual wells will be monitored annually after Year 1.
- 6. Some of the analyses listed here are also covered in the System Sampling Program presented in the Operation, Maintenance, and Monitoring Plan.

Sch. 80 PVC: schedule 80 polyvinyl chloride Sch. 40 PVC: schedule 40 polyvinyl chloride

SS: stainless steel Steel: low carbon steel

ft: feet

ft msl: feet relative to mean sea level ft bls: feet below land surface

TCL: Target Compound List

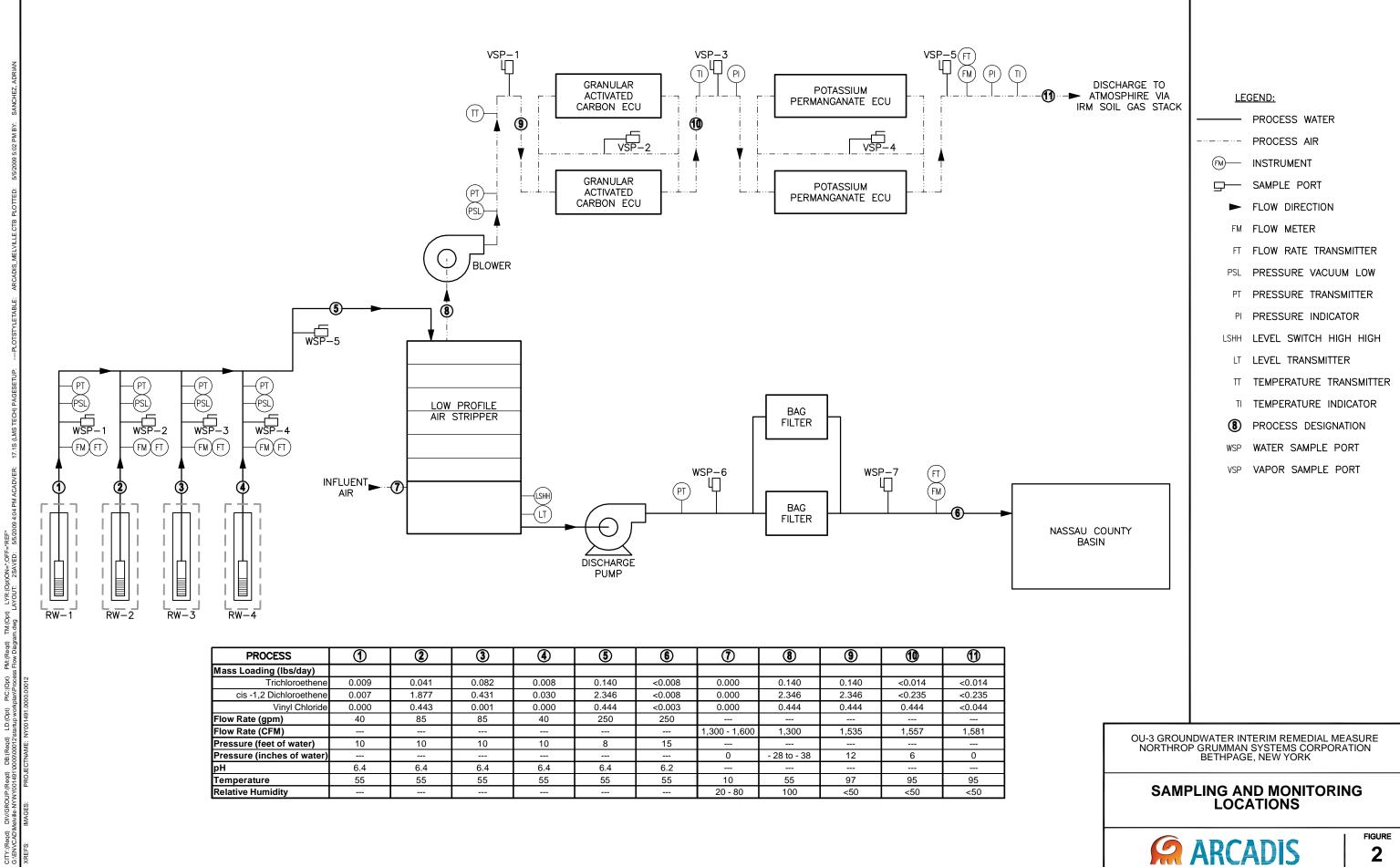


FIGURE 2

