DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
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BPMO NE/LM
Ser 07-126
September 7, 2007

Ms. Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section
United States Environmental Protection Agency (EPA)
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

Ms. Claudia Sait
Remedial Project Manager
Maine Department of Environmental Protection (MEDEP)
Bureau of Remediation and Waste Management
State House, Station 17
Augusta, ME 04333-0017

Dear Ms. Williams and Ms. Sait:

SUBJECT: RESPONSE TO COMMENTS FOR MONITORING EVENT 28 DRAFT REPORT, SITES 1, 3 AND EASTERN PLUME, NAVAL AIR STATION BRUNSWICK, MAINE

Attached please find the response to comments for Sites 1, 3 and Eastern Plume Monitoring Event 28 Draft Report, Naval Air Station Brunswick, Maine. These responses are provided for your review and comment/concurrence.

If you have any questions, or comments, please contact the Navy's Remedial Project Manager, Lonnie Monaco at (215) 897-4911, or me at (215) 897-4915.

Sincerely,

Dawn C. Kincaid

Dawn C. Kincaid, P.E.
BRAC Environmental Coordinator
By direction of BRAC PMO

Attachment:
Navy's response to comments for Sites 1, 3 and Eastern Plume Monitoring Event 28 Draft Report, NASB, Maine

Copy to:
EPA (M. Daley)
MEDEP (C. Evans)
Gannet-Fleming (P. Golonka, D. McTigue)
NASB (L. Joy, D. Mosher)
Lepage Environmental (C. Lepage)
NAVFAC Mid-LANT (L. Monaco, D. Barclift)
NAVFAC Atlantic (D. Waddill, J. Wright, B. Capito – Admin Record)
ECC (A. Easterday, G. Calderone, C. Guido)

Copy to: (w/o attach)
BLRA (C. Warren)
RAB Community Co-Chair (T. Fusco)
RAB Navy Co-Chair (CAPT Womack)
BASCE (E. Benedikt)
RAB Harpswell Representative (D. Chipman)
BRAC PMO (distribution)

Responses to Comments Provided by the State of Maine, Department of Environmental Protection on the Sites 1&3 Eastern Plume Monitoring Event 28 (April 2006) Draft Report, May 2007 Naval Air Station, Brunswick, Maine

Reviewer: Ms. Claudia Sait, MEDEP Project Manager
Date: August 22, 2007
Respondent: Navy
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	The data for Monitoring Event (ME) 28 are generally consistent with previous rounds, notable exceptions are included in the specific comments below. The April and June 2006 monitoring event omitted several locations included in the approved 2000 Long-Term Monitoring Plan (LTMP). This issue is being addressed through dispute resolution and will not be noted except where the omissions affect specific conclusions in the report.	Please see the Navy's letter dated July 2, 2007 to the EPA for a full explanation of how we determined which wells to sample and at what frequency. In short, the Navy conducted the sampling at Sites 1&3 and Eastern Plume for Monitoring Event 27 according to the October 2004 optimization proposal agreed to by the stakeholders. The final Sites 1&3 and Eastern Plume LTMP should have included the November 2004 revised proposal. This oversight will be corrected in the revised Sites 1&3 and Eastern Plume LTMP, which is scheduled to be finalized prior to the Fall 2007 monitoring event. Based on trend graphs that the Navy has developed using monitoring data from before and after the missing data, it is with reasonable certainty that similar contaminant concentrations would have been detected.
2	General	MEDEP generally agrees with and supports USEPA comments dated July 2, 2007, on this draft report. In particular MEDEP supports the need to evaluate groundwater concentrations of arsenic and manganese within the Eastern Plume as part of the site-wide background study. MEDEP also supports USEPA comment #7 from the July 2 letter, the report and Tables 1-1 and 1-2 should state that the wells, parameters and frequency apply specifically to ME 28 only or reference the appropriate version of the LTMP. Other specific comments are noted below.	**Noted.** See USEPA comments in the attached response to comments. The site-wide background study will include analytes that are agreed to by the Navy and the regulators. The ME 28 report will be updated to include updated information to summarize the ME 28 sampling and reference where appropriate the appropriate version of the LTMP. This will include updates to the appropriate tables and figures.
3	General	Correspondence between USEPA and Navy relating to the presence of 1,4 Dioxane in the Eastern Plume, and the need for treatment under the ROD has led to a Navy proposal to proceed with the CERCLA Remedial Investigation process to evaluate the nature and extent of 1,4 Dioxane in the plume and perhaps elsewhere at the site as part of the background study. As an interim step prior to this investigation proceeding MEDEP believes a focused synoptic round of water levels in the vicinity of the GWETS infiltration gallery would support a better understanding of	**Noted.** An interim investigation to determine water levels in the vicinity of the GWETS infiltration gallery to support flowpaths downgradient of the system should be discussed at the next Brunswick NAS technical meeting (September 2007).

Comment #	Location	Comment	Response
		flowpaths downgradient of the system. The wells typically included in the bi-annual LTM do not provide coverage near the GWETS. When the flowpaths are defined, optimum sample points can be selected to determine the influence of the re-introduction of 1,4 dioxane into the Eastern Plume by the GWETS.	
4	General	It is also notable that this is the first LTM round with the six new wells installed downgradient of the gap in the slurry wall at Landfills 1&3. The data indicate the presence of volatile organic compounds (VOCs), primarily breakdown products of 1,1,1 TCA, and metals such as iron, manganese and lead. This appears to be one of the few locations where VOC degradation/dechlorination is proceeding beyond 1,1 DCA in the groundwater, based upon the vinyl chloride and chloroethane concentrations detected.	**Concur.** This region and the vicinity of Mere Brook are the only region indicative of active–biodegradation. These regions must have adequate TOC to support reductive dechlorination. Lack of TOC is most likely the cause of halted bio-degradation in the Eastern Plume.
5	Section 1.2, Figures 1-4 and 1-5 and Tables 1-1 and 1-3	a.) The plotted groundwater elevation contours appear to be incorrect in several locations. On Figure 1-4, the 30 and 35 foot contour miss several of the wells north of the Weapons Compound and west of the Eastern Plume. On Figure 1-5, the 24, 27, and 30-foot contours also are not picking up wells in the same area. b.) Table 1-1 indicates MW-204, MW-220, MW-240, and MW-2101 are not required for gauging, but based on Table 1-3 they were gauged this round. Please revise as needed.	**a) Concur.** Contour water elevations will be corrected in the wells north of the Weapons Compound area and west of the Eastern Plume. **b) Concur.** Table will be updated to include wells that were gauged.
6	Section 1.3	*"In addition to these 10 wells, the Navy installed three monitoring well..."* Please revise the text to reflect that the 6 new wells and 4 existing wells (10 total) were sampled in ME28.	**Concur.** The text will be revised to reflect hat the 6 new wells and 4 existing wells (10 total) were sampled in ME28
7	Section 1.3	*"Water quality indicator parameters,. including pH, specific conductance..."* Only tables 1-7 and 1-8 are included. Please include the field parameter tables for the other locations sampled this round.	Tables 1-9 through 1-12 include other water quality indicator parameters. The final version of the document will include these tables if not included in the draft version.
8	Section 2.4.1 MW-218 Table	The ME28 date is listed as 2007, please revise.	**Concur.** The date will be correct to April 2006.
9	Section 2.4.5	*"No trending is shown since sampling is conducted on an annual basis."* MEDEP is uncertain why trending cannot be shown for annual sampling, please revise or provide further justification, as trends are interpreted for groundwater locations sampled annually for other locations at NASB	**Noted.** Trending will be provided in the September reports when sampling occurs. Since sediment samples were not collected no trending will be provided in the body of this report. The report will annotate this explanation.

Comment #	Location	Comment	Response
10	Section 2.5.1 Appendix C Figure 199	The trend figure for MW-332 has not been updated for ME27 and ME28, please revise.	**Concur.** The trend figure will be updated.
11	Section 2.5.2 Appendix B Tables and Appendix C Figures	a.) MW-231A – The detection limit for 1,1 DCE was listed as 10 ug/L (over the MEG/MCL) and there were trace detections of 1,1 DCA and 1,2 DCE (total). These are some of the first detections of VOCs at this location, and if they persist represent another portion of the leading edge of the plume. b.) MW-308 – The detections this round are a significant increase from previous rounds, and are also represent the first low-flow sample data in several years. This location may need to be re-evaluated for PDB placement depth or possibly needs re-development for the PDB to provide a representative sample. c.) MW-313 – MEDEP was unable to find any historical values approaching the TVOC high concentration of 18,990 ug/L noted in the table. Please revise as needed.	**a) Noted.** MW-231A will be closely monitored in future sampling events to determine if this is in fact a continuing trend. **b) Noted.** MW-308 and the detections should be discussed at the next technical meeting (September 2007). **c) Noted.** MW-313 will be reviewed and the correct high concentration will be provided.
12	Section 3.1	a.) Bullet 1:_*"These elevated VOC concentrations are within the plume..."* MEDEP believes MW-230A is appropriately noted as within the plume, based on several detections of TCE in excess of the MCL, and based on the overall migration of the plume to the south of Mere Brook. MEDEP agrees with the targeting of hot-spots to reduce overall VOC concentrations and improve removal rates by the extraction system. b.) Bullet 2, Recommendation: MEDEP agrees with the Navy's recommendation to discontinue MNA sampling program at this time. c.) Bullet 3, Recommendation: MEDEP had a difficult time making sense of this recommendation. It appears that two investigations are discussed. First, the joint effort by MEDEP, EPA and the Navy for the porewater investigation implemented in two phases, August and September 2005, but this investigation had no connection with Monitoring Event 27. The subsequent investigation performed by ECC in 2007 was a result of the initial porewater investigation. Please edit the recommendation heavily for verb tense and for clarity.	**a) Noted.** **b) Noted.** **c) Concur.** The recommendation will be changed to be, "Surface water results remain non-detect; however, the joint EPA, MEDEP, and Navy porewater sampling in August and September 2005 showed significant VOC detections in porewater along Merriconeag Stream. As a continuation of the 2005 porewater investigation, the Navy will perform a pore water sampling event at the confluence of Mere Brook and Merriconeag Stream to further quantify porewater VOC concentrations. ECC will develop a work plan outlining this sampling. The proposed investigation will be conducted in order to provide data to better define the geology and hydrogeology controlling the discharge of the Eastern Plume to the confluence

Comment #	Location	Comment	Response
			of Mere Brook and Merriconeag Stream, and to determine if VOCs are present in the stream from the discharge of the groundwater plume. This work is tentatively scheduled for 2007".
		d.) Bullet 4: MEDEP will consider the results of the fish tissue study prior to any optimization of the surface water or leachate seep locations. Groundwater is also impacted by chlorinated VOCs downgradient of the landfill, and MEDEP cannot fully agree with this conclusion due to the LTMP issues noted elsewhere.	**d) Noted.**
		e.) Bullet 5: MEDEP agrees that the extraction network has been successful in reducing VOC concentrations in some areas of the plume, but notes that hydraulic control is also exerted by the geology and hydrogeology in the area, as demonstrated by the migration of the southern and eastern boundaries of the plume. MEDEP also supports the USEPA comment on this section.	**e) Noted.** See response to USEPA comments.
13	Section 3.1	Bullets 2 & 4 – MEDEP agrees the groundwater model under development and the ongoing Mere Brook Investigation will be important for a comprehensive evaluation of the groundwater extraction network effectiveness. Assessing the chemical and gauging data alone will not be sufficient to complete a detailed evaluation of the capture zone and degree of hydraulic control achieved by the current network. Future changes in the extraction well network will require reconsideration of the LTMP wells and frequency to evaluate any changes in the plume distribution.	**Noted.**
14	Figure 2-2 and Appendix B Table B-3	The title box for the figure is dated 2005, please revise. Also the TVOC value for MW-231A should be noted as 3.6 ug/L rather than "0".	**Concur.** The title box will be updated to 2006 and will include 3.6 ug/L for MW-231A.
15	Table 1-4 MW-207AR and MW-331	a.) MW-331 has the highest total VOC concentration of any well in the Eastern Plume, and is one of the few gauging points in the central portion of the plume. Navy must make an effort to correct the obstruction so gauging can be completed, or evaluate alternate water level meters with a smaller diameter probe so that this data point can be collected in future events.	**a) Concur.** MW-331 has always been successfully sampled despite the obstruction. Navy is reviewing options for a smaller diameter probe or replacing MW-331.
		b.) MW-207AR was installed in 2002, please confirm a bottom depth for this location.	b) The bottom depth is 97 feet. The table will be updated by replacing (a) in Table 1-4 with "97".
16	Appendix B, Table B-12	The non-detects for alpha and gamma-chlordane, and hexachlorobenzene are noted as "0U". Was this the reporting limit provided by the laboratory, or was the value low enough to fall out due to significant digits in the printout?	**Noted.** The laboratory MRL was provided as 0.05 ug/l for these pesticides. The table notation, "0 U" will be replaced with "0.05 U".

Comment #	Location	Comment	Response
17	Appendix B Table B-9	The TVOC value for SW-10 is listed as 4.57 ug/L, however only bromoform is listed at 0.57 ug/L. Please revise the table, as needed.	**Concur.** The Table B-9 will be revised as necessary.
18	Appendix , Extraction Wells	The plots for the extraction wells have not been updated to 2006, please revise.	**Concur.** The trend graphs for the extraction wells will be updated.
19	Appendix D, Page 30	The aqueous VOC MDLs are listed as mg/L rather than ug/L, please revise.	**Noted.** The VOC MDLs will be listed as ug/L.
END OF COMMENTS			

Responses to Comments Provided by the United States Environmental Protection Agency New England – Region 1 on the Sites 1&3 Eastern Plume Monitoring Event 28 (April 2006) Draft Report, May 2007 Naval Air Station, Brunswick, Maine

Reviewer: Ms. Christine Williams, EPA Project Manager
Date: July 2, 2007
Respondent: Navy
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	This monitoring event did not include samples from various wells. The wells to be sampled are listed in the LTMP (EA 2000). A LTMP is required by the ROD. Therefore, the Navy is out of compliance with the RODs for these sites. EPA cannot agree with the Navy's conclusion that the objectives of the LTMPs were met without all of the expected data. EPA cannot agree with the Navy's conclusion that the concentration trends at the landfill or the plume are stable without all of the expected data.	Please see the Navy's letter dated July 2, 2007 to the EPA for a full explanation of how we determined which wells to sample and at what frequency. In short, the Navy conducted the sampling at Sites 1&3 and Eastern Plume for Monitoring Event 27 according to the November 2004 revised optimization proposal agreed to by the stakeholders. The final Sites 1&3 and Eastern Plume LTMP should have included this revised proposal. This oversight will be corrected in the revised Sites 1&3 and Eastern Plume LTMP, which is scheduled to be finalized prior to the Fall 2007 monitoring event. Based on trend graphs that the Navy has developed using monitoring data from before and after the missing data, it is with reasonable certainty that similar contaminant concentrations would have been detected.
2	General	Please provide the rationale for neglecting to sample existing wells in the agreed to finalized LTMP (EA 2000).	See response to Comment 1.
3	General	The Navy is not treating 1,4-dioxane even though the plume and/or the effluent is above EPA risk levels (6 ppb) and State ARARs (32 ppb). The Navy is not treating the groundwater for arsenic even though the plume is above MCLs (10ppb). The Navy is not treating the groundwater for manganese even though the plume is above EPA risk levels (300 ppb). How is the Navy's groundwater extraction and treatment system restoring the aquifer if the Navy is not treating the extracted groundwater for various contaminants above risk levels or ARARs? The Navy is also out of compliance with the ROD in this respect.	**Noted.** The Navy will address the 1,4 dioxane issue in a separate letter. Please refer to Navy correspondence," Eastern Plume (OU-5), 1,4-Dioxane; Naval Air Station Brunswick, Maine" (Navy June 2007 Serial Number 07-071). The GWET system, developed in conjunction with the MEDEP and EPA, was established to remove ROD COCs, which are CVOCs, from the Eastern Plume. Metals at that time were not determined to be COCs in the ROD. Arsenic and Manganese detections are located in the distal portion of the plume. The southern distal portion of the Eastern plume has natural reducing conditions (from TOC in the lowland brooks), which may be mobilizing naturally occurring arsenic

Comment #	Location	Comment	Response
			and manganese. The upcoming background study will provide more insight in comparing similar strata under similar reducing conditions.
4	General	The Navy has notified EPA that they are upgrading the equipment in the treatment plant to treat the 1,4-dioxane. EPA agrees to extend the requirement for a schedule for completion of the upgrades and beginning of treatment for 1,4-dioxane to no later than August 10, 2007 as requested by the Navy in their June 26, 2007 letter.	**Noted**. Please refer to Navy correspondence," Eastern Plume (OU-5), 1,4-Dioxane; Naval Air Station Brunswick, Maine" (Navy June 2007 Serial Number 07-071).
5	General	The Navy has not evaluated the plume for arsenic and manganese; these inorganics are only sampled for in conjunction with the MNA evaluation. EPA agrees with the Navy's proposal to evaluate the nature and extent of arsenic and manganese contaminants throughout the eastern plume as part of the facility wide background study	**Concur.** The site-wide background study will include analytes that are agreed to by the Navy and the regulators.
6	General	Results from Event 28 are generally consistent with recent trends (see, e.g., Appendix C), particularly for VOCs. Notable exceptions include: a. Metals at MW-217B: Inorganics concentrations returned to historical levels at MW-217B following a "spike" in ME 27. In ME27, the well purged dry; in this round, it yielded water, although turbidity was high (140 NTU). It is noted that ORP was very low (-356 mV), so much of the high iron detected (39 mg/L) was likely in solution. Despite the high Fe and Mn (1.1 mg/L), most trace metals are non-detect (ND). b. VOCs at MW-308: TCE (49 ppb), 1,1-DCE (29 ppb), and 1,1-DCA (15 ppb) jumped significantly from the previous round (Fall 2002, all ND). This location is downgradient of the historical hotspot at P-106, and the new detections may represent the advective arrival of hotspot contamination. c. TCE at MW-230A: TCE exceeded the MCL at MW-230A, at the leading edge (south) of the plume. Although suggestive of continued expansion of the plume, this is not unprecedented; a similar concentration was observed in 2004	**Comments Noted.**
7	General	The document makes a significant and welcome effort to clarify the history and status of the Long Term Monitoring Plan (LTMP). However, it is nowhere clear what version of the LTMP was followed in ME28. This should be stated clearly in Sec. 1.0. It is also recommended that Tables 1-1 and 1-2 be annotated with the sampling plan that they reflect. This is particularly important during the transition to a new LTMP that is underway at present, given that there has been some misunderstanding in this regard.	**Noted. See response to Comment 1.**

Comment #	Location	Comment	Response
8	Page 1-1, Section 1.0	The historical review of the Long-Term Monitoring Plan (LTMP) is a welcome feature of the report. Please add to this history a clear statement regarding which version of the LTMP was followed for ME28, the subject of this document. Please see General Comment 1.	**Noted. See response to Comment 1.** **NO!**
9	Page 1-4, Section 1.1. Last Bullet	The last bullet on this page indicates that the monitoring data are to be used to "analyze the effective capture zone ... ." Will such an analysis be provided as part of the numerical model currently under development?	**Concur.** The groundwater model will be used to determine capture zones.
10	Page 1-5 Section 1.2	As noted in EPA comments on previous monitoring reports, the interpretations of the shallow and deep hydraulic potential surfaces (Figs. 1-4 and 1-5) do not honor the influence of the slurry wall. If the slurry wall is indeed an impermeable barrier (and there is nothing in the present to data to suggest that it is not), and it is keyed into the underlying clay, equipotentials must be perpendicular to the wall (both outside and inside). The wall allows a discontinuous potential surface, with high water outside, and low water inside. The interpretation shown in Figs. 1-4 and 1-5 attempts to define a continuous surface, and suggests flow through the wall. Please revise the contours to account for the hydraulic effects of the wall. An example was provided with EPA comments on ME 27.	**Concur.** The contour groundwater levels will be updated.
11	Page 1-5, Section 1.2, Figure 1-4	The 35-ft (msl) contour passes to the upgradient side of the cluster of wells including MW-224, MW-222, MW-209, MW-223, and MW-106, all of which recorded water levels greater than 35 ft. Please revise accordingly.	**Noted.** See MEDEP Comment 5.
12	Page 1-5, Section 1.2	The text states, "Pumping rates ... for the period May 2005 through April 2006 ... are provided in Table 1-5." However, the table shows data from October 2005 through March 2006. Please check text and table for consistency, and edit accordingly.	**Noted.** The dates will be corrected for consistency, as they should read October 2005 through March 2006. The table is correct the text will be updated.
13	Page 2-1, Section 2.1	The first paragraph of this section gives the percentage of available hours over which the GWETS was operational. This figure would be more meaningful to the reader if the period to which it applies were given. It appears from Table 1-5 that this period is October 2005 through March 2006.	**Concur.** The percentage is based on the period from October 2005 through March 2006.
14	Page 2-1 Section 2.1, Figure	The red arrow is intended to span from April 2005 to April 2006. By the scale, however, it appears to go from March 2006 to February 2006. Please check for consistency.	**Noted.** The red arrow is intended to mark the time period from October 2005 through March 2006. Text and arrow will be updated.
15	Page 2-,2, Section 2.2	The text states, "The trigger elevations were established to prevent groundwater from infiltrating the landfill cap." It would be more precise to state that high groundwater might be an indication of infiltration through the cap and/or leakage through the slurry wall.	**Noted.** The section will be updated to include that high groundwater might be an indication of infiltration through the cap and/or leakage through the slurry wall.

Comment #	Location	Comment	Response
16	Page 2-6 Section 2.4.3 Tables	The tables for SEEP-03 and SEEP-04 describe the trends for a number of analytes as "spike," where this is not apparent in the data. VOCs at SEEP-03 showed a "spike" two events previously, but a spike is not obvious in ME28. Al, Cr, and Ni are described as exhibiting a "spike," but the bar graphs suggest that the spikes occurred in the previous event, rather than in ME28. Please check tables for consistency.	**Concur.** The tables for SEEP-03 and SEEP-04 will be checked for consistency.
17	Page 2-8, Section 2.4.4 Table	The table for LT-09 describes the trend for Co as a "spike." However, the bar graph suggests that the spike occurred in the previous event, rather than in ME28. Please check table for consistency.	**Concur.** The tables for LT-09 will be checked for consistency.
18	Page 2-9, Section 2.5	Because the tables provided in this section include results for total VOCs, it might be noted that the computed totals omit acetone, if that is the case, so that the totals shown can be reconciled with the complete analytical data tables (Appendix B).	**Noted.** The tables and analytical data tables (Appendix B) will be consistent.
19	Page 2-10, Section 2.5.2 Paragraph 2	The text states, "The reported total VOC concentrations ... are shown on Figure 1-5. Figure 2-2 provides a map of the VOC concentration in the deep wells." Should this read, "The reported total VOC concentrations ... are shown on Figure 2-2?"	**Concur.** The text should state that reported total VOC concentrations...are shown on Figure 2-2.
20	Page 2-13, Section 2.5.2 P-106	The table entry for 1,4-dioxane shows only two bars, and the second is lower than the first. The plot provided in Appendix C shows four dioxane analyses from 2004 through early 2006. The table shows a range of results with a minimum of 35 ppb, yet the result for September 2005 is shown as 30 ppb, and that for April 2006 is shown as 31 ppb. Please check the table for completeness and consistency.	**Concur.** The table for 1,4-dioxane will be updated to include all 1,4-dioxane results.
21	Page 2-11, Section 2.5.2 MW-313	The table for MW-313 describes the trend for 1,4-dioxane as a "increasing." However, the bar graph shows two successive declines following a maximum in ME26. Please check table for consistency.	**Noted.** The trend graph in Appendix C will be checked for consistency.
22	Page 2-18, Section 2.6.2 Figure 2-5	The figure shows green stippling across the entire eastern portion of the domain shown, implying that this area shows "limited evidence of biodegradation." This seems like an unsupported extrapolation from a few control points. It is entirely likely that these more favorable conditions for reductive dechlorination are more localized, and should be displayed as such.	**Noted.** The purple area has little to no MNA possible, while the Green area has just slightly more possibility than the black areas. As such the difference between the two regions is not terribly significant, as MNA is not a active component of site remediation in either colored area. The MNA study conclusions for the purple and green regions are that MNA is halted and limited due to lack of organic carbon in the sampled regions of the Eastern Plume. The last sentence of last paragraph of Section 2.6.2 will state that MNA is halted and limited due to lack of organic carbon in sampled regions in Eastern Plume instead of "indicates the potential for attenuation at the site."
23	Page 3-2 Section 3.1, First Bullet	The text states, "However, no chlorinated VOCs were detected in these three additional surface water samples. Surface water impacts associated with plume discharge to Mere Brook and Merriconeag stream are, however, ongoing." Is the intent to state not that surface water impacts	**Noted.** The text should state that the characterization of the potential surface water impact is ongoing.

Comment #	Location	Comment	Response
		are ongoing, but that *characterization* of potential surface water impact is ongoing? Please check and edit as appropriate	
24	Page 3-2 Section 3.1 Third Bullet	The report states, "The extraction well network appears to have nearly complete effectiveness at maintaining hydraulic control … ." It is not clear that hydraulic control has been tested or demonstrated in a comprehensive fashion. While the contaminant footprint does not appear to be changing rapidly or substantially, that is possible even without hydraulic control (e.g., via source control, mass extraction in hotspots, and dispersion at the margins of the plume). The current effort to develop a numerical model for the plume should provide a useful tool with which to examine the degree of hydraulic control.	**Noted.** The plume footprint has shrunk over the years the GWETS system has been in operation. The groundwater model will be used to evaluate hydraulic control.
25	Page 3-3, Section 3.1 First Bullet	The recommendation to re-install EW-1 is well founded. It is noted that the TCE exceedance detected at MW-203A, downgradient of the extraction well, provides added support for improving capture at EW-1.	**Noted.**
26	Table B-2	The entries for inorganics for MW-1303S,D show, under the "Sampling Method," that the wells were sampled by passive diffusion bags. Were these not low-flow samples? Please check table and edit as needed.	**Noted.** The tables will be checked for consistency with sampling methods.
END OF COMMENTS			