

**Responses to Comments Provided by the United States Environmental Protection Agency
 New England – Region 1 on the
 Site 9 Monitoring Event 28 (January and April 2006) Report, May 2007
 Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Christine Williams, EPA Project Manager
 Date: June 18, 2007
 Respondent: ECC and Navy
 Date: August 17, 2007

Comment #	Location	Comment	Response
1	General	<p>Water-level and analytical results reported in this document are limited in their coverage; the January 2006 supplemental sampling included sampling and analysis of only four wells (MW-NASB-072, -074, -075, -076), and the April sampling (ME28) included only three wells (MW-NASB-069, -075, -227). Although the report notes that some sampling was precluded by excavation work at the site (p. 2, top), it is not clear exactly how this impacted the sampling and analysis. Please add a table to the report showing which wells are stipulated for LTM sampling by the revised LTM Plan, dated October 2005, and, for each well, whether or not it was sampled. For those wells that were not sampled, please provide the reason (e.g., destroyed, inaccessible, frozen, etc.). (Note: the LTMP was revised in November 2006, however those revisions do not affect the wells to be sampled or gauged.) Please also add a table showing which wells are stipulated for water-level gauging, which were actually gauged, and, for those that were not gauged, the reason.</p>	<p>Concur. A detailed table of the groundwater sampling and gauging plan followed for this sampling round will be added to the Report to clearly indicate which wells were sampled as part of the LTM and which wells were not sampled along with a reason. Similarly, the table will specify which wells were gauged and not gauged as part of the LTM for Site 9.</p>
2	General	<p>Analytical results from both January and April 2006, although limited in coverage, are consistent with past results. The only VOC exceedances observed were for vinyl chloride at MW-NASB-069 in April (9.8 J ppb) and at MW-NASB-076 in January (1.2 ppb). Exceedances of secondary MCLs were observed for Al, Fe, and Mn at MW-NASB-069, and are likely related to the reducing conditions observed there (-68 mV); the sample exhibited low turbidity (1 NTU). DRO were detected at MW-NASB-075 in both January (150 ppb) and April (72 ppb).</p>	<p>Noted.</p>

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3	Page 3, Metals1	Please note that the water quality standards cited for Al, Fe, and Mn are "secondary" MCLs. Use of this term here would provide useful perspective when viewing the reported exceedances.	Concur. Note that the MCL's referred to in the text are National Secondary Drinking Water Regulations, (NSDWR) which are EPA recommendations for regulating analytes in drinking water distributed in drinking water systems. Eastern Plume is not a source location for a drinking water system nor anticipated to be, and therefore the NSDWR standards are not applicable to this project. The MEG for manganese is 500 ug/L. Table 4 will also be revised with the most current MEGs and MCLs. This section will be revised as follows: "There were no reported exceedances of metals in the LTMP groundwater samples collected as part of the Spring 2006 sampling events".
4	Appendix D	It appears that MW-NASB-069, -075, and -227 were sampled and analyzed for VOCs in April 2006, but only the graph for -069 appears to have not been updated with these results. Please check for completeness and consistency.	Noted. All VOCs data do appear on the trend graphs for the listed wells. Please check the graphs of the 'low-flow' versus 'deep diffusion' sampling techniques'. These trend graphs in Appendix D will be reviewed and revised accordingly, if necessary in the Final Report.
5	Appendix D	It appears that results from the supplemental sampling conducted in January 2006 are not shown on the trend plots. This would affect the VOC trends shown for MW-NASB-072, -074, -075, and -076. If a decision was made by the Navy only to plot results from the routine LTM sampling (e.g., April 2006), this should be stated in the report, so that readers do not assume that the plots include all available data at the time of the document preparation. EPA does not agree with this position, if taken, and requested all data be plotted	Concur/Discuss. The rationale for the January 2006 supplemental sampling for TPH-DRO at Site 9 was completed at the request of MEDEP/EPA in order to investigate dead vegetation observed at the edge of the impoundment pond during a site walk conducted on 5 October 2005. This sampling was not part of the LTM program. The current database was set up specifically to support only the LTM sampling data. The database would require modification in order to accommodate the inclusion of additionally future non-LTM data. However, based on the EPA's request, if additional supplemental sampling data is continued to be sampled at Site 9, for 3 monitoring event periods or more (which would provide enough data trend graphs to begin to present graphically) the Navy will provide a graphical representation of the supplemental sampling in separate trend graphs from the LTM data. The Navy suggests discussing this topic when, and if, additional supplemental data is collected at Site 9 which can be plotted and presented graphically.

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6	Appendix D	<p>The figures for trends in inorganics show concentrations of magnesium (see figures for MW-NASB-069, -070, and -079). For all three wells for which results are displayed, the most recent results are ND at a detection limit of 5 mg/L. Why is Mg of particular interest at the site? One disadvantage of displaying Mg on these plots is that, as a major element, concentrations (and detection limits) are expected to be high relative to other trace metals of interest (e.g., Cd, Cr), so that any detections of the latter may not be discernible on the plots because of the scale. It might be of greater value with respect to site water quality to plot manganese, which showed an exceedance of the secondary MCL (0.050 mg/L), the Maine MEG (0.200 mg/L), and the EPA risk level (0.300 mg/L) at MW-NASB-069 (0.320 mg/L). Please consider displaying results for Mn rather than Mg in future reports.</p>	<p>Noted. The trend graphs will be updated to include manganese (as well as magnesium) in the Final Report. If necessary, the data will be shown on a separate trend graphs to accommodate the required scales.</p>
<p>END OF COMMENTS</p>			