Gradient

December 13, 2010

Mr. Richard W. Hull
Remedial Project Manager
NH/RI Superfund Section
US Environmental Protection Agency (US EPA)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Response to US EPA's Conditional Approval of Gradient's Proposed Fall 2010 Annual Groundwater Quality Monitoring Plan
Savage Well Superfund Site, Operable Unit-2 (OU-2)

Dear Mr. Hull:

On behalf of Hitchiner Manufacturing Company, Inc. and Thomas & Betts Corporation (Settling Parties), Gradient is submitting this response to the US EPA's conditional approval to Gradient's Proposed Fall 2010 Annual Groundwater Quality Monitoring Plan. Below is a response to the US EPA's comments.

1. **US EPA Comment:** "In the Monitored Natural Attenuation (MNA) Evidence section of the Plan, you site a USEPA 2002 RDI as indicating that "biodegradation plays a relatively insignificant role in the attenuation of PCE at the Site . .. " In the following paragraphs, while indicating that PCE concentrations have declined in specific wells, you site that " ... MNA is effectively degrading VOCs in this part of the site." In future reports, more specific and detailed information shall be provided to describe the mechanisms that are effecting [SIC] the attenuation of PCE at the Site, rather then [SIC] the general and conflicting description of degradation provided in the Plan."

   Response: The language in the monitoring plan has been updated to provide a more precise description of the mechanisms that affect natural attenuation of PCE at the site.

2. **US EPA Comment:** "Groundwater sampling at the recently repaired well MW-14R shall be conducted at a depth of 86.5 ft·bgs - the midpoint of the open borehole - as has been the practice since the well was installed. In addition, Gradient Corporation shall determine the location of water-bearing fractures within the borehole and collect water quality samples from those locations to begin establishing a baseline for any future compliance monitoring."

   Response: As outlined in the revised monitoring plan, groundwater samples will be collected from (77 and 108 ft-bgs) identified by the USGS geophysical logging results. However, upon consultation with the USGS (Harte, 2010) , these samples will be collected during the June 2011 sampling round, and instead only one additional sample (from 72 ft-bgs, 2 ft into the well screen) will be collected during the annual monitoring round in order to assess the well repair activities performed at MW-14R earlier this year.

3. **US EPA Comment:** "Groundwater sampling at well MW-11R shall be conducted at a depth of 90 ft-bgs the midpoint of the open borehole - as has been the practice since the well was installed. In addition, water quality samples shall be collected

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from the midpoint of the water bearing fractures at 94, 98 and 102 ft-bgs to begin establishing a baseline for any future compliance monitoring."

Response: As outlined in the revised monitoring plan, groundwater samples will be collected from water bearing fractures at 94, 98, and 102 ft-bgs identified by the USGS geophysical logging results.

4. **US EPA Comment:** "In addition to the MNA wells identified for monitoring in the Plan, the following MNA wells shall also be monitored: FH-4, FH-5, MW-11 2A, MW-1 13A and MW-19A."

Response: FH-4 was already part of the monitoring program and listed on Table 1 of the proposed plan. The other wells, FH-5, MW-11 2A, MW-1 13A and MW-19A have been added to the revised monitoring plan.

Please let me know if you have any questions or feedback on this proposed sampling plan, or if you need any additional information.

Yours truly,

GRADIENT

Manu Sharma, P.E.
Principal

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