Management Options

- Continued monitoring of gw and surface water
- Downgradient control / treatment of plume
- Contaminant source control

Options Analysis Matrix

| | Financial | Regulatory | Public Relations | Liability | Technical | Safety | |
|----------------------------|--|--|--|--|--|---|-----------------|
| General Objectives : | Cost effective, protective of HH&E | Control off-site COC migration, plume stability | Maintain positive relationships | Eliminate / minimize | Long-term effectiveness, no O&M | Minimize H&S exposure | Scoring Results |
| Option A | 5 | 1 | 1 | 1 | 1 | 5 | 14 |
| Monitoring | | Does not control migration or stability | | No immediate impact, liability may increase | Not effective in reducing mobility, toxicity or volume | Minimal exposure | |
| Option B | 1 | 4 | 5 | 5 | 3 | 3 | 21 |
| Downgradient Control | | Plume migration control, may not control stability | | Positive impact, off-site migration is curtailed | Reduces mobility, toxicity, not volume | Some exposure during installation and operation | |
| Option C | 4 | 5 | 4 | 3 | 5 | 3 | 24 |
| Source Control | | May have longer- term effect on migration and stability | Highly visible, results may be longer-term | Longer-term, positive impact on liability | Reduces mobility, toxicity and volume | Some exposure during installation and operation | |

* Note: Scale is based on 5 to 1, where 5 is the most positive impact on each category while a 1 represents the most negative impact.

Reasons for Choosing Source Control

- Source area is relatively small and well-defined
- Source control may be effective in controlling migration and plume growth
- Fits with plans for future site use, no O&M requirements, cost effective

Source Control Alternatives Evaluated

- Excavation with off-site incineration
- Containment through capping
- Soil vapor extraction with off-gas treatment
- In-situ contaminant destruction through ZVI saturation

| | Financial | Regulatory | Public Relations | Liability | Technical | Safety | | | |
|-------------------------------|--|---|--|---|--|--|-----------------|--|--|
| General Objectives : | Cost effective, protective of HH&E | Control COC migration, plume stability | Maintain positive relationships | Eliminate / minimize | Constructability, Long-term effectiveness, No O&M | Minimize H&S exposure | Scoring Results | | |
| Option A | 1 | 5 | 4 | 5 | 3 | 1 | 19 | | |
| Excavate and incinerate | | Total removal of COC | Hauling issues, preference for permanent remedy | Permanent removal of material | Constructability issues; no O/M | Much exposure to COC's | | | |
| Option B | 5 | 2 | 2 | 2 | 3 | 5 | 19 | | |
| Containment by capping | | COC remains untreated, migration may be controlled | Not perceived as a final solution | Miminum reduction in liabilty | Some on-going maintenance | Minimal exposuures | | | |
| Option C | 3 | 3 | 5 | 4 | 3 | 4 | 22 | | |
| Soil vapor extraction | | No assurance that all COC's are removed | No impact in community | Mass reduction and assoc. liability reduction | Some effectiveness questions, some on-going O/M | Potential exposures to vapors, condensate | | | |
| Option D | 4 | 4 | 5 | 4 | 4 | 3 | 24 | | |
| Zero-valent iron treatment | | COC's are treated or contained | No impact in community | Mass reduction and assoc. liability reduction | Minimal on-going maintenance | Potential exposure during mixing | | | |

Remedial Alternatives Analysis Matrix

* Note:

Scale is based on 5 to 1, where 5 is the most positive impact on each category while a 1 represents the most negative impact.

Laboratory Testing

- Representative soil samples from contaminated area
- Series of beaker tests to establish optimum mix ratios
- Results show almost immediate destruction of CT
- Formation and eventual destruction of daughter products
- Unexpected formation of low levels of PCE and Hexachlorobutadiene

Pilot Testing

- Desired low-cost, quick method to field test laboratory findings
- >\$50K to mobilize full-scale equipment

Pilot Test Equipment



The ZVI and Clay Mix



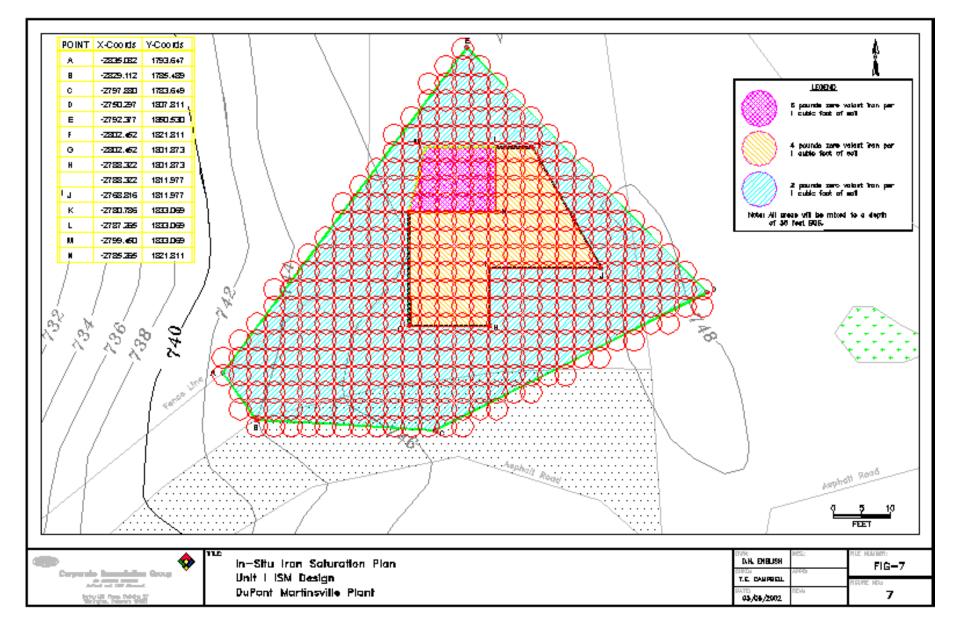


Injecting ZVI / Clay Mix





Lay-out of Three Treatment Zones



Full-Scale Implementation (Oct-Dec 02)

- 8 to 10 person crew
- Equipment
 - Link-Belt Crane
 - Casagrande Mixing Unit with 8 ft diameter auger
 - Excavator
 - Batch Plant
 - Fork-Lift





Project QA/QC Parameters

- Post-mixing soil iron and clay content at various depths
- Post-remediaton soil sampling at various depths
- Long-term downgradient groundwater and surface water monitoring program











