

Stratford Army Engine Plant
Restoration Advisory Board (RAB)
Meeting June 1, 2000

The Stratford Army Engine Plant (SAEP) which is proceeding with closure action under provisions of the Base Realignment and Closure Act (BRAC) of 1995 will hold a Restoration Advisory Board (RAB) on June 1, 2000 at 7p.m. in Room 22, Stratford Army Engine Plant. The meeting is open to the public. Parking is in the West Lot and entry through the main guard station.

Stratford Army Engine Plant
Restoration Advisory Board (RAB)
Meeting June 1, 2000

AGENDA

1. Welcome, opening remarks, introductions, announcements, old business.
2. Presentation of Engineering Evaluation/Cost Analysis [EE/CA] for Operable Unit 2 (Groundwater).

Discussion of remedy alternatives.

3. Open forum, next meeting, adjourn.

AUG 17

For additional information call the SAEP BRAC office (John Burleson) at 385-4316 or Jim Otto, RAB Community Co-Chairperson at Redacted - Privacy Act

**RAB MEETING – JUNE 1, 2000
SIGN-IN SHEET**

Ken Feathers	CT DEP	
RICK NOERIS	SAEP LRA	381-2045
X Nelson Walter	Harding Lawson	207-775-5401
X GINA RUSTAD	Harding Lawson	207-775-9401
X STU PEARSON	" "	" " "
JIM OTTO	RMS	—
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John Burleson		
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MICHAEL SUSCA	TRC	(860) 298-6234
Michelle Frack	USACE	978-318-8228
Megan Cassidy	EPA	
Marcia Stewart	RAB	
Stan Silverstein	RAB	
Elaine O'Keete	RAB	
Jim Murphy	USEPA	617-918-1028
Fred Berger	Team STH	

Redacted - Privacy Act

Brad Robbins	Team STH
Janet Calucci	RAB
DEBBIE GALLO	SECRETARY

STRATFORD ARMY ENGINE PLANT (SAEP)
RESTORATION ADVISORY BOARD (RAB)

MEETING MINUTES

June 1, 2000

The SAEP Restoration Advisory Board conducted a Regular Meeting on Thursday, June 1, 2000 at 7:00 pm in Room 22 of SAEP, 550 Main St., Stratford, CT, pursuant to notice duly given.

Call to Order: The meeting was called to order at 7:05 p.m.

Presiding: J. Otto and J. Burleson, Community Co-Chairmen

In Attendance: J. Carlucci, E. O'Keefe, S. Silverstein, M. Stewart, J. Mihaley, K. Feathers, R. Norris, N. Walter, G. Rustad, S. Pearson, P. Durgin, M. Susca, M. Brock, M. Cassidy, J. Murphy, Redacted - Privacy Act F. Berger, B. Robbins

1. Welcome, Opening Remarks, Introductions, Announcements, Old Business: J. Burleson welcomed Gina Rustad of Harding Lawson.

2. Presentation of Engineering Evaluation/Cost Analysis (EE/CA) for Operable Unit 2 (Groundwater):

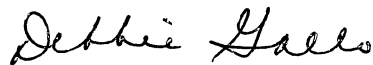
- °OU2 Pilot Tests & Objectives
- °TCE Areas & Treatments
- °Hexavalent Chrome Area
- °Groundwater VOCs

Discussion and review of remedy alternatives.

3. Open Forum, Next Meeting: The next RAB meeting will be on Thursday, August 17, 2000.

4. Adjournment: There being no further business, the meeting adjourned at 9:15 p.m. on a Motion by M. Stewart and seconded by J. Mihaley.

Respectfully submitted,



Debbie Gallo, Recording Secretary

NOTE: Informal discussion regarding meetings with RAB members other than the monthly formal presentations by specialists.



**Operable Unit (OU) 2
Pilot Tests and
Engineering
Evaluation/Cost
Analysis (EE/CA)**

STRATFORD ARMY ENGINE PLANT

**Foster Wheeler and
Harding Lawson Associates**

June 1, 2000

OU 2 - Pilot Tests

- Evaluation of remedial technology for hot-spot contamination near former Chromium Plating Facility
- Conducted in-situ Hexavalent Chromium and Trichloroethene tests from November 30 through December 11, 1999 and from January 19 to February 1, 2000
- Review Objectives

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Harding Lawson Associates

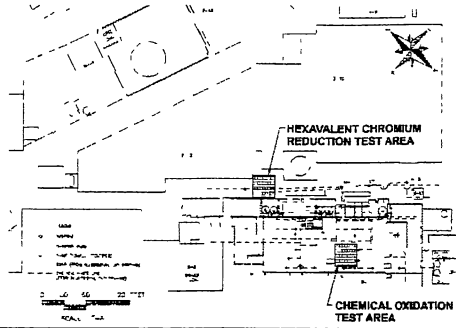
OU 2 - Pilot Tests

- Review System Setup/Installation
- Review Results

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Locations of Pilot Tests



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OU 2 - Pilot Test Objectives

■ Hexavalent Chromium (Cr⁶⁺) Area

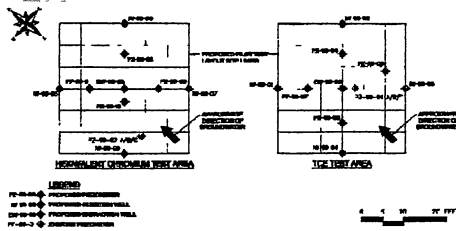
- In-situ reduction of Cr⁶⁺ to Cr³⁺ by addition of ferrous sulfate
- Mass reduction of source area
- Attempt to achieve CTDEP RSR (SWPC) of less than 0.11 mg/L Cr⁶⁺

■ Trichloroethene (TCE) Area

- In-situ oxidation of TCE to end products (CO₂, Cl₂, H₂O) by potassium permanganate
- Mass reduction of source area
- Attempt to achieve CTDEP RSR (SWPC) of less than 2.34 mg/L TCE

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Pilot Test Layouts



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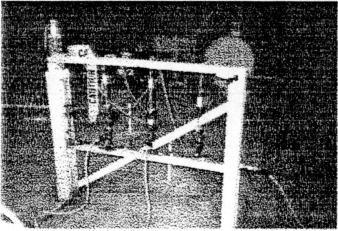
TCE Treatment Area



02/10/2007 10:01 AM

Harding Lawson Associates

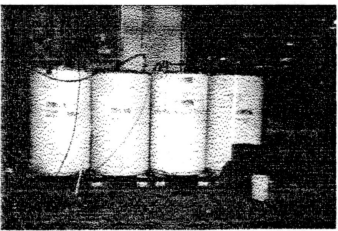
Ferrous Sulfate Injection Manifold



02/10/2007 10:01 AM

Harding Lawson Associates

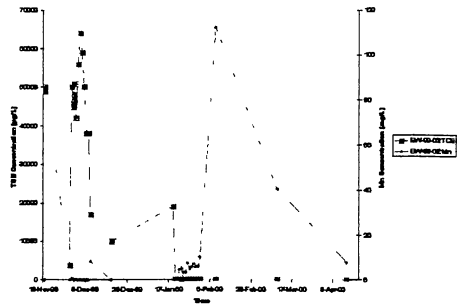
Carbon Treatment Units



02/10/2007 10:01 AM

Harding Lawson Associates

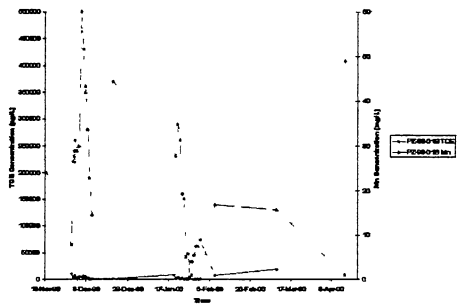
TCE Area - EW-99-02



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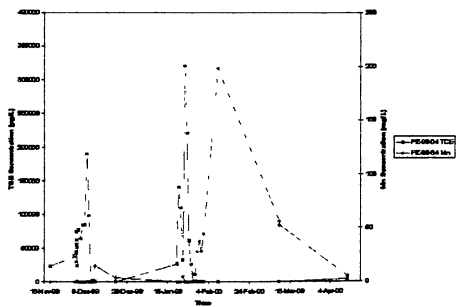
TCE Area - PZ-99-01B



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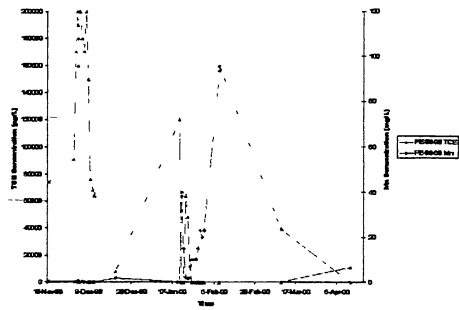
TCE Area - PZ-99-04



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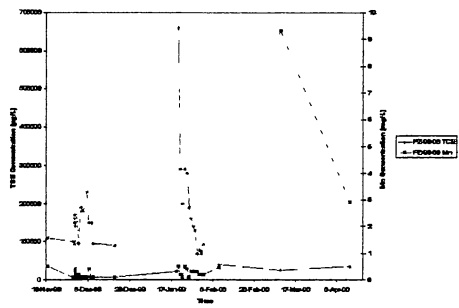
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TCE Area - PZ-99-05



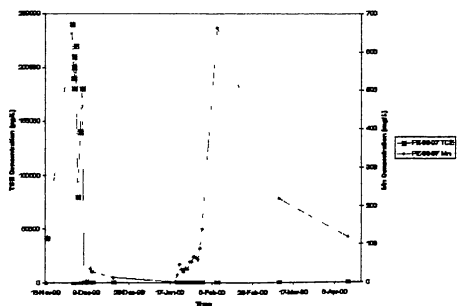
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TCE Area - PZ-99-06



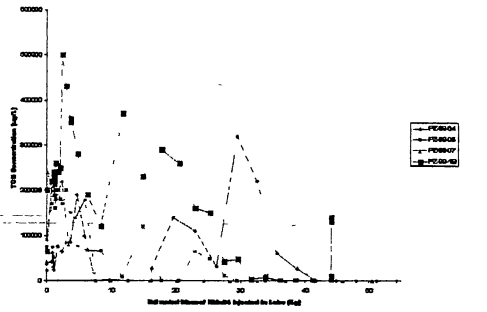
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TCE Area - PZ-99-07



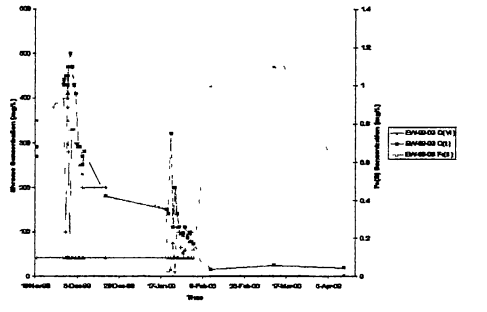
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TCE Area - Effect of KMnO4 Dose



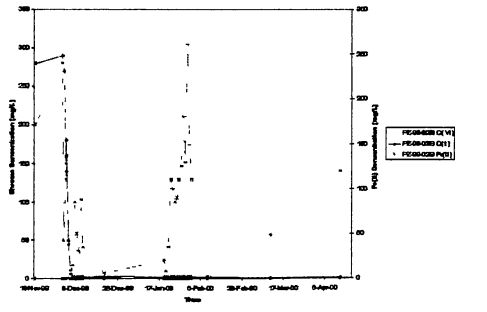
Harding Livestock Associates

Hexavalent Chrome Area - EW-99-03



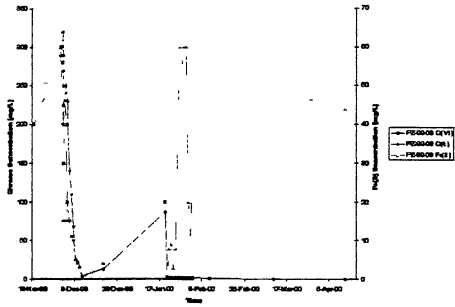
Harding Livestock Associates

Hexavalent Chrome Area - PZ-99-02B



Harding Livestock Associates

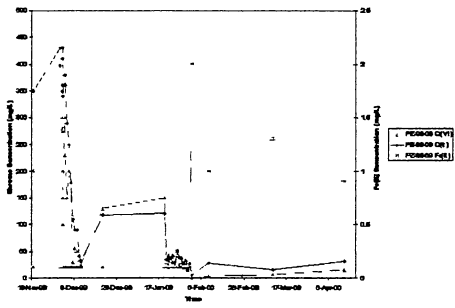
Hexavalent Chrome Area - PZ-99-08



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Harding Lawson Associates

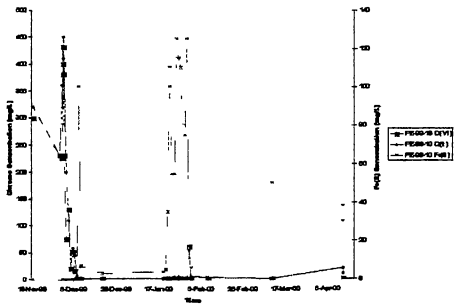
Hexavalent Chrome Area - PZ-99-09



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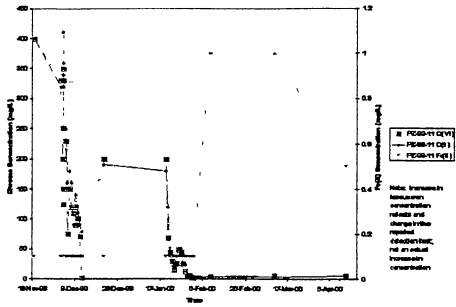
Hexavalent Chrome Area - PZ-99-10



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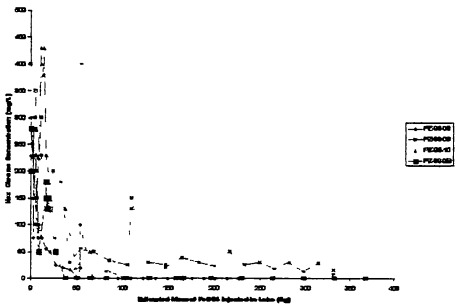
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Hexavalent Chrome Area - PZ-99-11



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Chrome Area - Effect of FeSO4 Dose



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Pilot Test - Summary of Results

- Reduction of Cr⁶⁺ and TCE in groundwater demonstrated
- Effective treatment achieved in piezometers at conclusion of test
- Heterogeneous aquifer properties affect distribution of reagents
- Time required to treat the pilot test area is longer than predicted

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Pilot Test - Summary of Results (continued)

- Rebounding concentrations have been observed, but still orders of magnitude below initial concentrations
- Rebound sampling to be conducted through July 2000

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OU 2 Engineering Evaluation/Cost Analysis (EE/CA)

- Documents the process for development and evaluation of potential removal actions
- Considers short-term removal actions to minimize or eliminate site risk
- Deals with the removal of risk, not necessarily contamination

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Relationship to the Feasibility Study (FS)

- FS considers remedial actions rather than removal actions
- Remedial actions are long-term, permanent actions to minimize or eliminate site risk
- Removal actions in this EE/CA are consistent with potential long-term remedial actions

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OU 2 EE/CA Process

- Summarize site background and previous investigations
- Identify the objectives and scope of the removal actions
- Identify possible ARARs
- Develop potential removal action alternatives
- Perform an evaluation of the alternatives using the general criteria of effectiveness, implementability, and cost
- Recommend a preferred removal action alternative

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OU 2 EE/CA

- Purpose:
 - To identify removal action objectives and develop and evaluate removal action alternatives to meet the objectives
 - To promote early reuse of facilities by expediting environmental cleanup (BRAC)
- Scope:
 - Identify removal action objectives
 - Develop and evaluate removal action alternatives
 - Propose a removal action remedy

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OU 2 EE/CA

- The EE/CA was prepared in accordance with the:
 - Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
 - National Oil and Hazardous Substances Pollution Contingency Plan (NCP)
 - USEPA Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA (August 1993)
 - Base Realignment and Closure Cleanup Plan Guidebook (Fall 1993)

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OU 2 EE/CA

■ The OU 2 EE/CA addresses:

- Chromium-contaminated interior structures in the former Chromium Plating Facility
- Hexavalent chromium-contaminated groundwater
- Volatile organic compound (VOC)-contaminated groundwater hot-spots

04/02/2004

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Chromium-contaminated Structures

■ Removal Action Objective:

- Protect potential receptors from exposure to high concentrations of hexavalent chromium on structures

■ Extent of Contamination:

- Northwestern wall
- Concrete floor (throughout facility)
- Overhead beams in northern portion of facility

04/02/2004

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Hexavalent Chromium in Groundwater

■ Removal Action Objective:

- Prevent high concentrations of hexavalent chromium from potentially migrating to surface water and impacting receptors

■ Extent of Contamination:

- Defined as the area of detectable hexavalent chromium (>0.1 mg/L)
- A smaller area (10,400 square feet) below the southern end of the facility
- A larger area (40,000 square feet) north of the facility
- Vertical extent generally less than 35 feet below ground surface

04/02/2004

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VOCs in Groundwater

■ Removal Action Objectives:

- Prevent the migration of VOC-contaminated vapors from groundwater hot-spots to the interior of on-site buildings
- Prevent high concentrations of VOCs in shallow groundwater from potentially migrating to surface water and impacting receptors

■ Extent of VOC Hot-spot Contamination:

- TCE greater than 100,000 micrograms per liter
- 1,1-DCE greater than 5,000 micrograms per liter
- 1,1,1-TCA greater than 100,000 micrograms per liter

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VOCs in Groundwater (continued)

■ Extent of VOC Hot-spot Contamination (continued)

- VOC Hot-spot No. 1 is located beneath the former Chromium Plating Facility and contains primarily TCE contamination
- VOC Hot-spot No. 2 is located between Buildings B-16 and B-48 and contains primarily TCE contamination
- VOC Hot-spot No. 3 is located in the center of Building B-2 and contains primarily 1,1-DCE and 1,1,1-TCA contamination
- Considering contamination less than 60 feet below the groundwater table

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Applicable or Relevant and Appropriate Requirements (ARARs)

■ Chemical-specific (partial listing)

- CTDEP RSR criteria

■ Location-specific (partial listing)

- Floodplain management
- Coastal zone management

■ Action-specific (partial listing)

- Air Emissions
- Clean Water Act
- Underground Injection Regulations
- Hazardous Waste Management

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Groundwater Technology Screening

- Developed a list of potential technologies considering literature information, vendor information, and past technology performance
- Screened the technologies with respect to site- and waste-limiting characteristics
- Resulting list of technologies can be used alone or in combination to create removal action alternatives

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Chromium Structures Alternatives

- CR-S-1: Removal and Off-site Disposal of Floor and Wall/Decontamination of Beams
- CR-S-2: Removal and Off-site Disposal of Wall/Impermeable Cover on Floor/Decontamination of Beams

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Alternative CR-S-1

- Components include:
 - Complete a structural analysis
 - Remove contaminated wall
 - Remove contaminated floor
 - Place impermeable vapor barrier
 - Pour a new concrete floor
 - Re-wash, sandblast, and/or paint overhead beams, as necessary
 - Re-wash entire facility
 - Implementation of an Environmental Land Use Restriction (ELUR)

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Alternative CR-S-2

■ Components include:

- Complete a structural analysis
- Remove contaminated wall
- Re-wash, sandblast, and paint overhead beams, as necessary
- Re-wash entire facility
- Place impermeable vapor barrier
- Pour a new concrete floor
- Implementation of an ELUR

04/02/2001

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Hexavalent Chromium Groundwater Alternatives

■ CR-GW-1: In-situ Reduction using Ferrous Sulfate

■ CR-GW-2: Groundwater Monitoring

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Alternative CR-GW-1

■ Injection of a ferrous sulfate solution into the subsurface to convert hexavalent chromium to the less toxic trivalent form

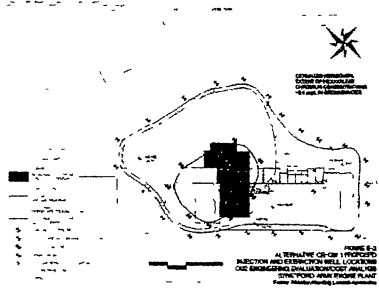
■ Components include:

- Installation of a ferrous sulfate injection system
- Installation of a groundwater extraction system
- Pressure testing of the chemical waste pipeline
- Construction of an organics treatment system
- Operation and maintenance of the treatment system
- Groundwater sampling and analysis
- Implementation of an ELUR

04/02/2001

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Alternative CR-GW-1 - In-situ Reduction Layout



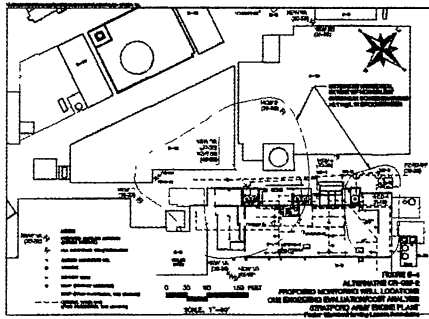
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Alternative CR-GW-2

- Monitoring of chromium concentrations to evaluate if contamination is migrating or converting to the trivalent form
- Components include:
 - Installation of groundwater monitoring wells
 - Groundwater sampling and analysis
 - Implementation of an ELUR

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Alternative CR-GW-2 - Groundwater Monitoring



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VOC Hot-spot Groundwater Alternatives

- **Alternative VOC-1: In-situ SVE and Groundwater Monitoring**

- **Alternative VOC-2: In-situ Chemical Oxidation using Potassium Permanganate, In-situ Air Sparging, In-situ SVE, and Groundwater Monitoring**

- **Alternative VOC-3: In-situ Thermal Treatment, In-situ SVE, and Groundwater Monitoring**

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Alternative VOC-1

- **SVE system: collects VOC-contaminated vapors from the subsurface and transports them to a surface treatment system**
- **Groundwater Monitoring: evaluates if VOC contamination is migrating or if natural attenuation is occurring**

4/10/2007

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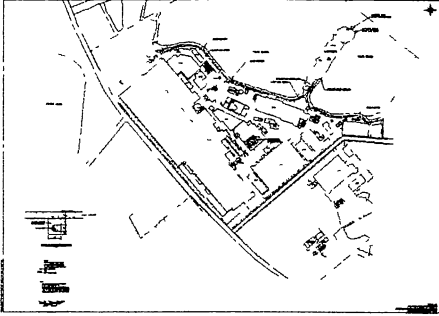
Alternative VOC-1 (continued)

- **Components include:**
 - Installation of a 20-acre SVE system
 - Operation and maintenance of the SVE system
 - Installation of groundwater monitoring wells
 - Groundwater sampling and analysis
 - Implementation of an ELUR

4/10/2007

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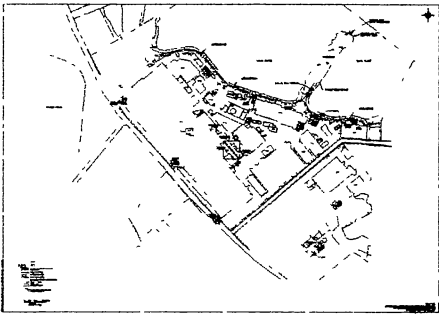
**Alternative VOC-1 - Soil Vapor Extraction
Layout**



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**Alternative VOC-1 - Groundwater
Monitoring**



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Alternative VOC-2

- **Chemical Oxidation:** Injection of a potassium permanganate solution into the subsurface to convert TCE to less toxic compounds
- **Air Sparging:** Injection of air into the subsurface to physically strip 1,1,1-TCA and 1,1-DCE from groundwater and transport them to a subsurface vapor collection system
- **Soil Vapor Extraction and Groundwater Monitoring:** same as for Alternative VOC-1

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Alternative VOC-2 (continued)

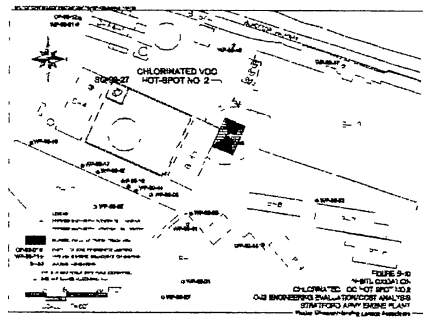
■ Components include:

- Installation of a potassium permanganate injection system
- Installation of a groundwater extraction system
- Pressure testing of the chemical waste pipeline
- Construction of an organics treatment system
- Construction of an in-situ air sparging system
- Construction of a 20-acre SVE system
- Operation and maintenance of the treatment systems
- Installation of groundwater monitoring wells
- Groundwater sampling and analysis
- Implementation of an ELUR

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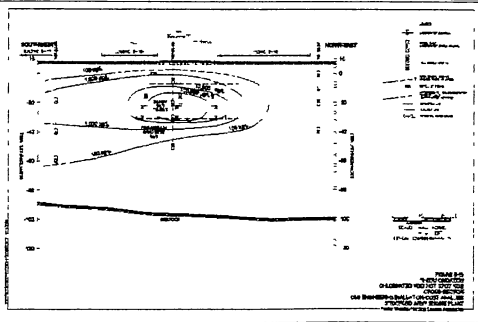
Alternative VOC-2 - In-situ Chemical Oxidation Layout



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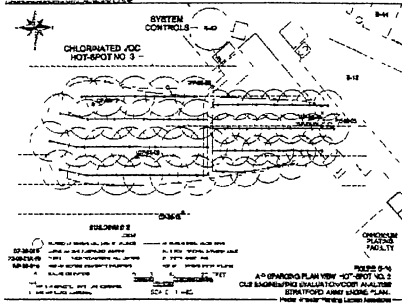
Alternative VOC-2 - In-situ Chemical Oxidation Cross Section



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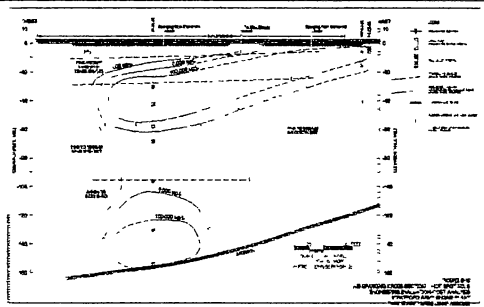
Alternative VOC-2 - Air Sparging Layout



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Alternative VOC-2 - Air Sparging Cross Section



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Alternative VOC-3

- **Six-phase Heating:** Electrical heating of the subsurface volatilizes contaminants and causes them to rise to a subsurface vapor collection system
- **Dynamic Underground Stripping:** Injection of steam into the subsurface volatilizes contaminants and causes them to rise to a subsurface vapor collection system
- **Soil Vapor Extraction and Groundwater Monitoring:** same as for Alternative VOC-1

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Alternative VOC-3 (continued)

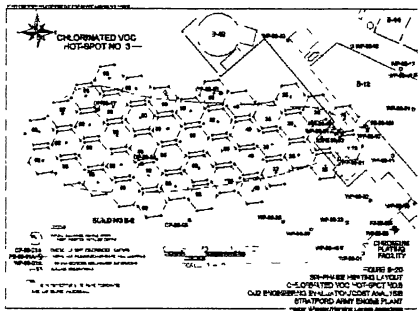
■ Components include:

- Construction of the thermal treatment systems
- Construction of a 20-acre SVE system
- Operation and maintenance of the treatment systems
- Installation of groundwater monitoring wells
- Groundwater sampling and analysis
- Implementation of an ELUR

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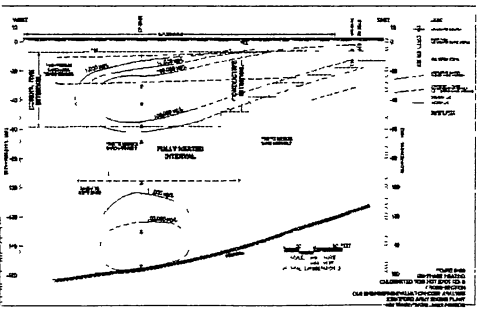
Alternative VOC-3 - Six-phase Heating Layout



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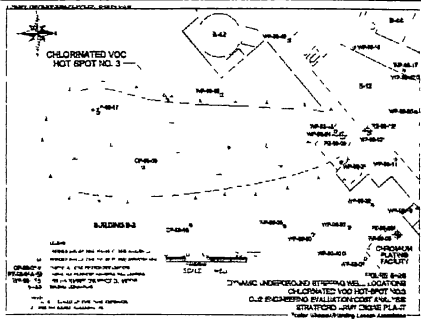
Alternative VOC-3 - Six-phase Heating Cross Section



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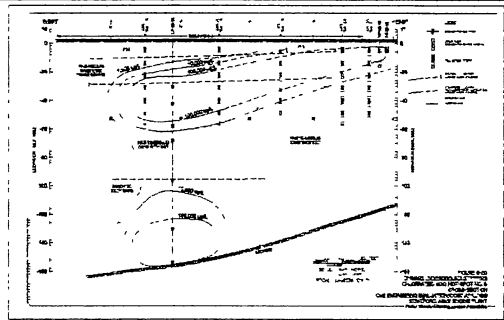
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Alternative VOC-3 - Dynamic Underground Stripping Layout



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Alternative VOC-3 - Dynamic Underground Stripping Cross Section



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Evaluation of Removal Action Alternatives

- Evaluation is based on specific criteria set forth in the NCP and USEPA guidance on preparing EE/CAs
- Evaluation criteria are:
 - Effectiveness
 - Implementability
 - Cost

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Effectiveness Evaluation

- Overall protection of human health and the environment
- Compliance with ARARs
- Long-term effectiveness
- Reduction of toxicity, mobility, or volume through treatment
- Short-term effectiveness

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Implementability Evaluation

- Technical feasibility
- Administrative feasibility
- Availability of services and materials
- State acceptance
- Community acceptance

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Cost Evaluation

- Capital cost (direct and indirect costs): for the construction of an alternative and the first two years of operation
- Operation and maintenance cost: for the lifetime operation of the alternative up to 30 years, if necessary

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Comparative Analysis

- Compares the alternatives to one another relative to the evaluation criteria
- Identifies the advantages and disadvantages of the alternatives relative to one another
- Aids in the selection of a recommended removal action alternative
- Completed separately for each contaminant type

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Comparative Analysis of Alternatives - Chromium Structures

Nine Criteria	Wall Removal/ Beam Decommissioning/Floor Removal and Replacement	Wall Removal/ Beam Decommissioning/ New Floor Over Old
Protects human health and environment	⊕	⊕
Meets Federal and State requirements	⊕	○
Provides long-term protection	⊕	⊕
Reduces mobility, toxicity or volume through treatment	⊖	⊖
Provides short-term protection	⊕	⊕
Can be implemented	⊕	⊕
Cost	Capital: \$772,000 O&M: \$47,000	Capital: \$659,000 O&M: \$47,000
State Agency Acceptance	To be determined after the public comment period.	
Community Acceptance	To be determined after the public comment period.	

⊖ Does not meet criteria ⊕ Meets or exceeds criteria ○ Partially meets criteria

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Comparative Analysis of Alternatives - Chromium Groundwater

Nine Criteria	In-situ Remediation	Groundwater Monitoring
Protects human health and environment	⊕	⊕
Meets Federal and State requirements	⊕	○
Provides long-term protection	⊕	○
Reduces mobility, toxicity or volume through treatment	⊕	⊖
Provides short-term protection	⊕	⊕
Can be implemented	⊕	⊕
Cost	Capital: \$3.85 M O&M: \$310,000	Capital: \$489,000 O&M: \$457,000
State Agency Acceptance	To be determined after the public comment period.	
Community Acceptance	To be determined after the public comment period.	

⊖ Does not meet criteria ⊕ Meets or exceeds criteria ○ Partially meets criteria

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Comparative Analysis of Alternatives - VOC Groundwater

Nine Criteria	SVE and Groundwater Monitoring	Oxidation/Air Sparging/ SVE/Groundwater Monitoring	Thermal Treatment/ SVE/Groundwater Monitoring
Protects human health and environment	⊕	⊕	⊕
Meets Federal and State requirements	○	○	⊕
Provides long-term protection	⊕	⊕	⊕
Reduces mobility, toxicity or volume through treatment	○	○	⊕
Provides short-term protection	⊕	⊕	⊕
Can be implemented	⊕	⊕	⊕
Cost	Capital: \$628 M O&M: \$4.51 M	Capital: \$77.1 M O&M: \$5.53 M	Capital: \$33.0 M O&M: \$218.8 M O&M: \$21.94 M
State Agency Acceptance	To be determined after the public comment period.		
Community Acceptance	To be determined after the public comment period.		

⊕ Does not meet criteria ⊕ Meets or exceeds criteria ○ Partially meets criteria

6/10/2007

Harding Lawson Associates

Chromium Structures Recommended Alternative

Alternative CR-S-1

- Is protective of human health and the environment
- Complies with ARARs
- Provides long-term effectiveness
- Provides short-term effectiveness to site workers and the community
- Is easily implemented
- Is cost-effective

6/10/2007

Harding Lawson Associates

Chromium Groundwater Recommended Alternative

Alternative CR-GW-1

- Is protective of human health and the environment
- Complies with ARARs
- Provides long-term effectiveness
- Reduces mobility, toxicity, and volume through treatment
- Provides short-term effectiveness
- Is easily implemented
- Is cost-effective

6/10/2007

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**VOC Hot-spot Groundwater
Recommended Alternative**

- Discussions regarding the recommended alternative for VOC-contaminated groundwater are being conducted

010279001.pdf

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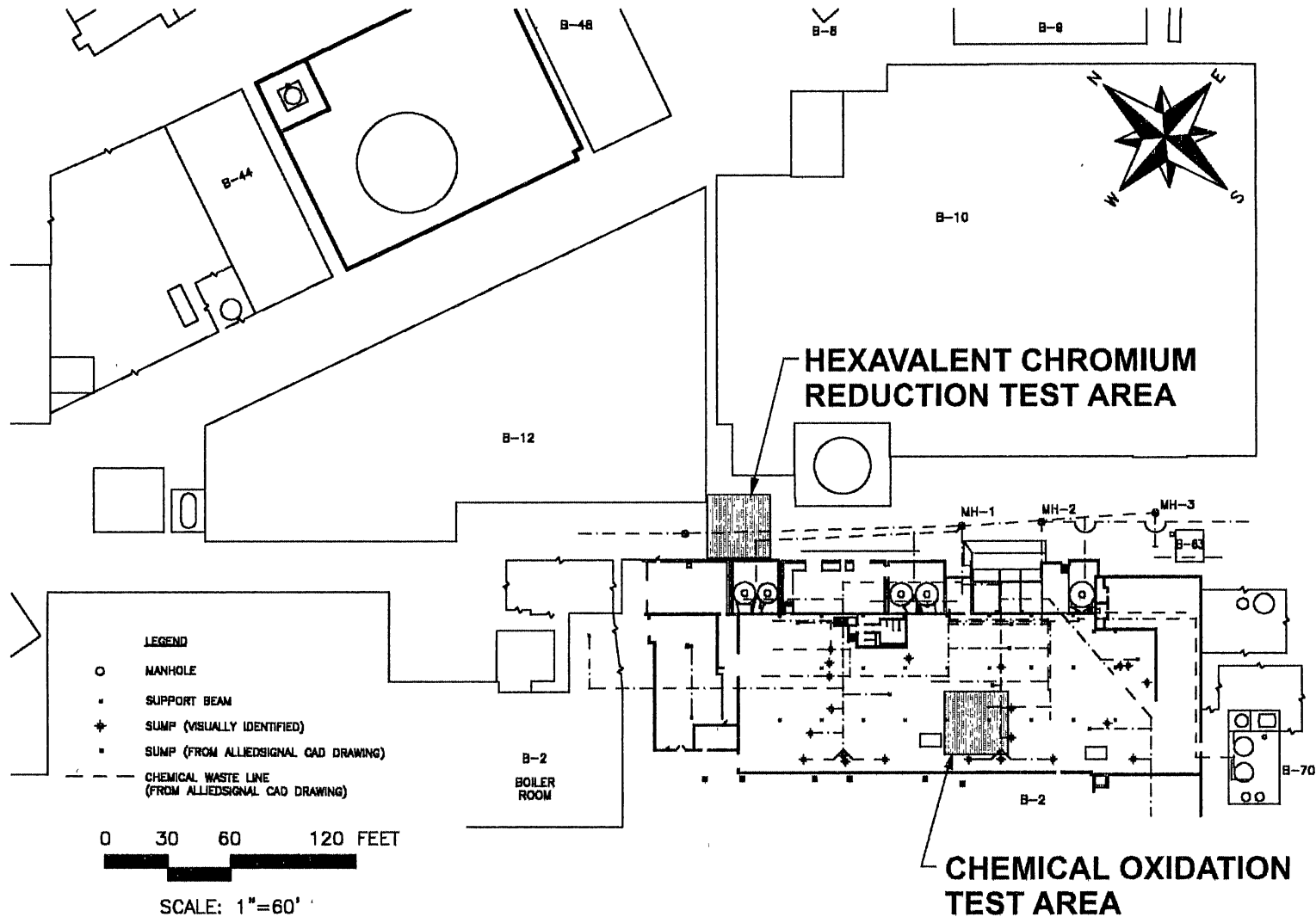
OU 2 EE/CA Schedule

- Submit Draft EE/CA for regulatory agency review (June 2000)
- Submit Final EE/CA for Public Comment Period (August 2000)
- Submit Removal Action Memorandum (October 2000)

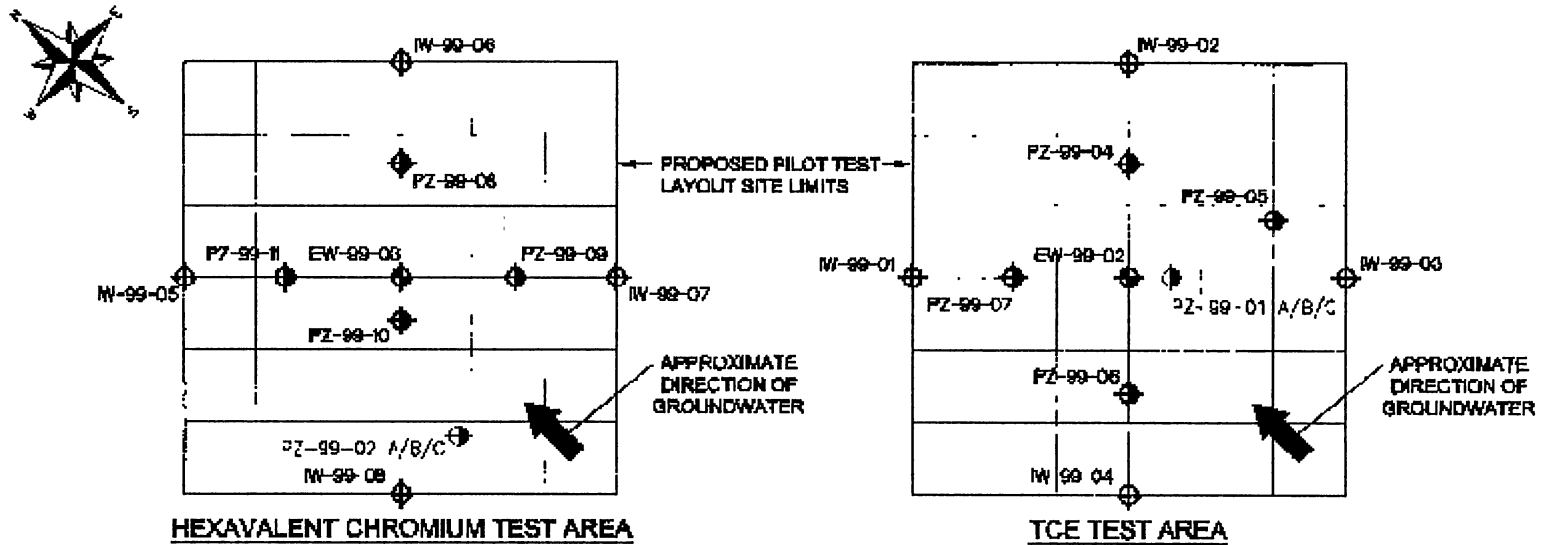
010279001.pdf

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Locations of Pilot Tests



Pilot Test Layouts



HEXAVALENT CHROMIUM TEST AREA

TCE TEST AREA

LEGEND

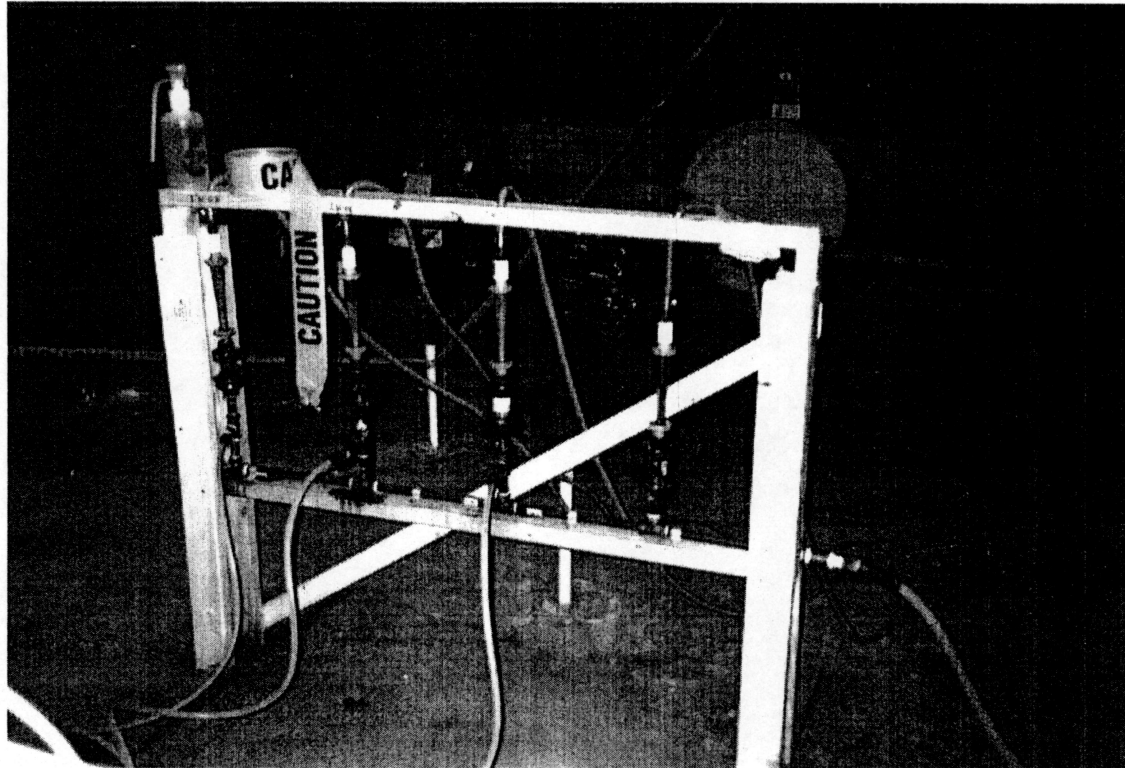
- PZ-99-08 PROPOSED PIEZOMETER
- IW-99-03 PROPOSED INJECTION WELL
- EW-99-03 PROPOSED EXTRACTION WELL
- P7-99-11 EXISTING PIEZOMETER



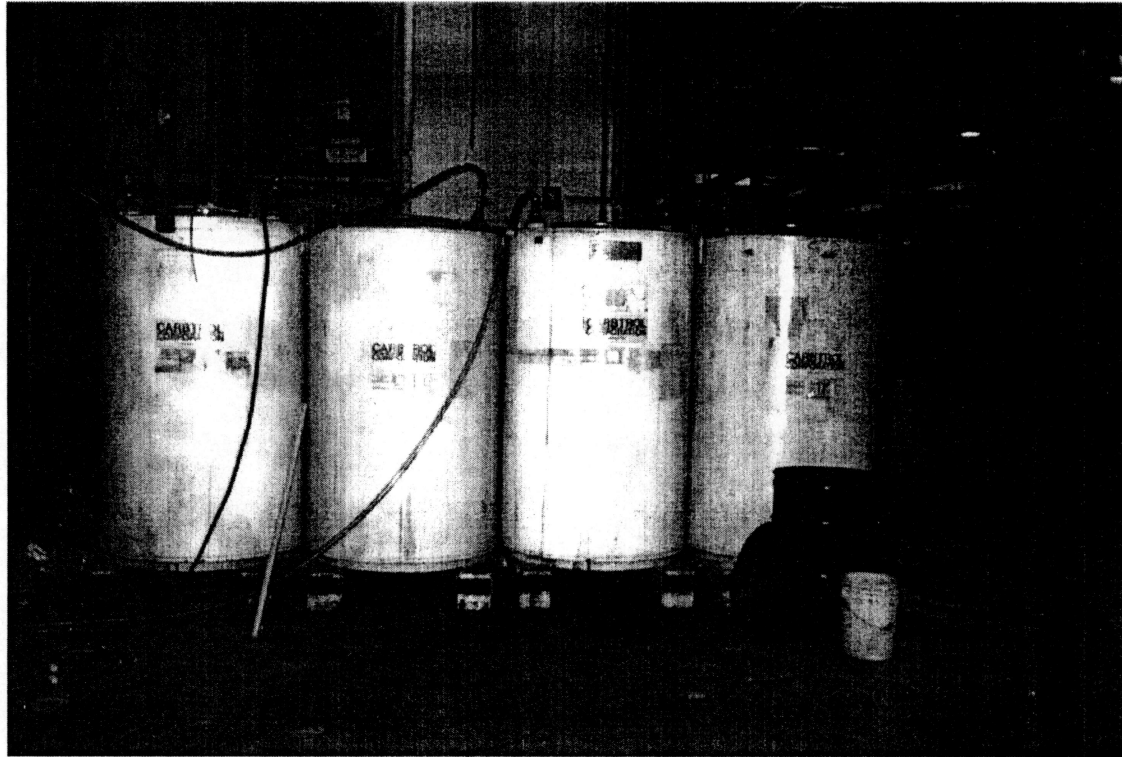
TCE Treatment Area



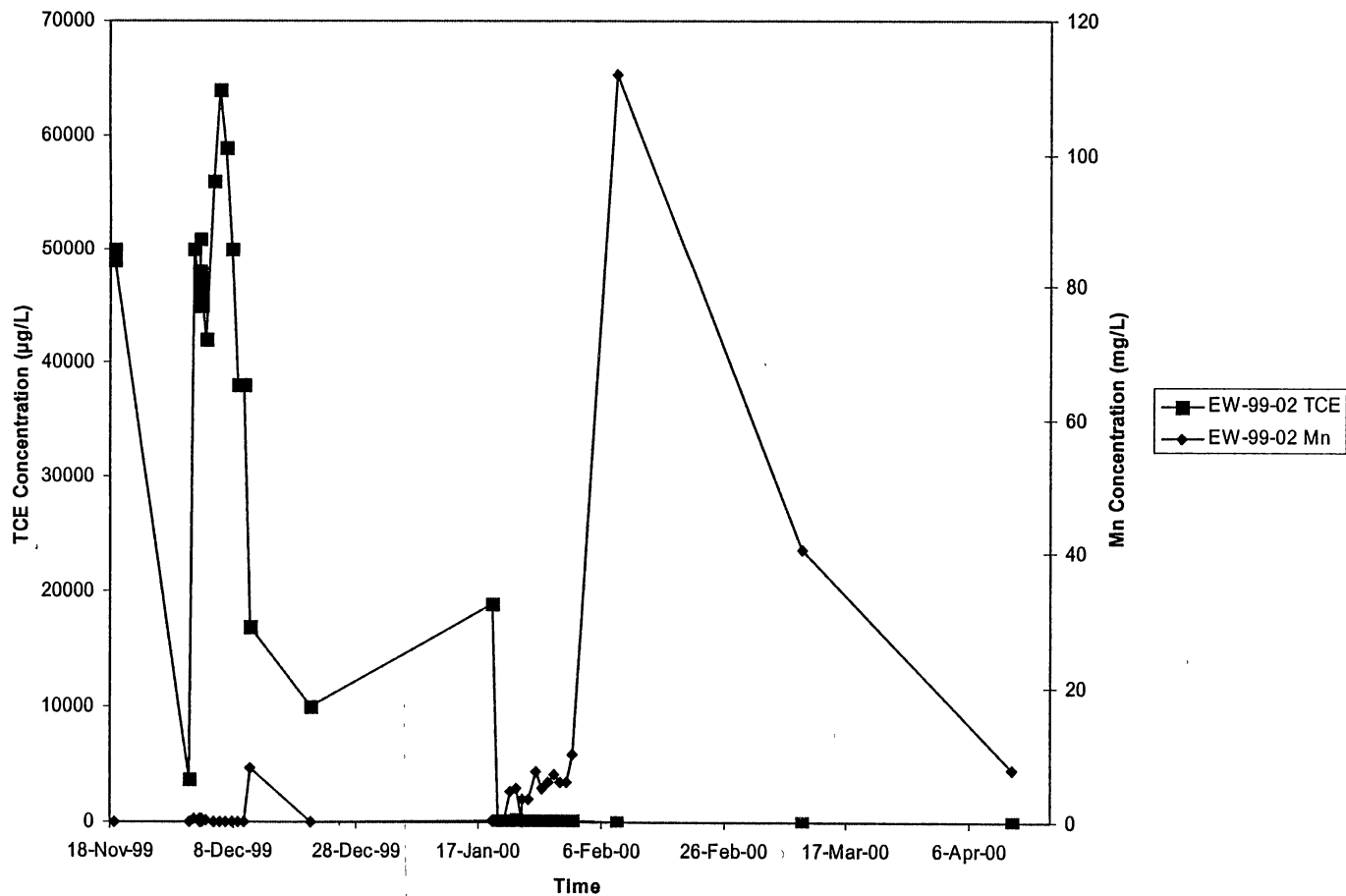
Ferrous Sulfate Injection Manifold



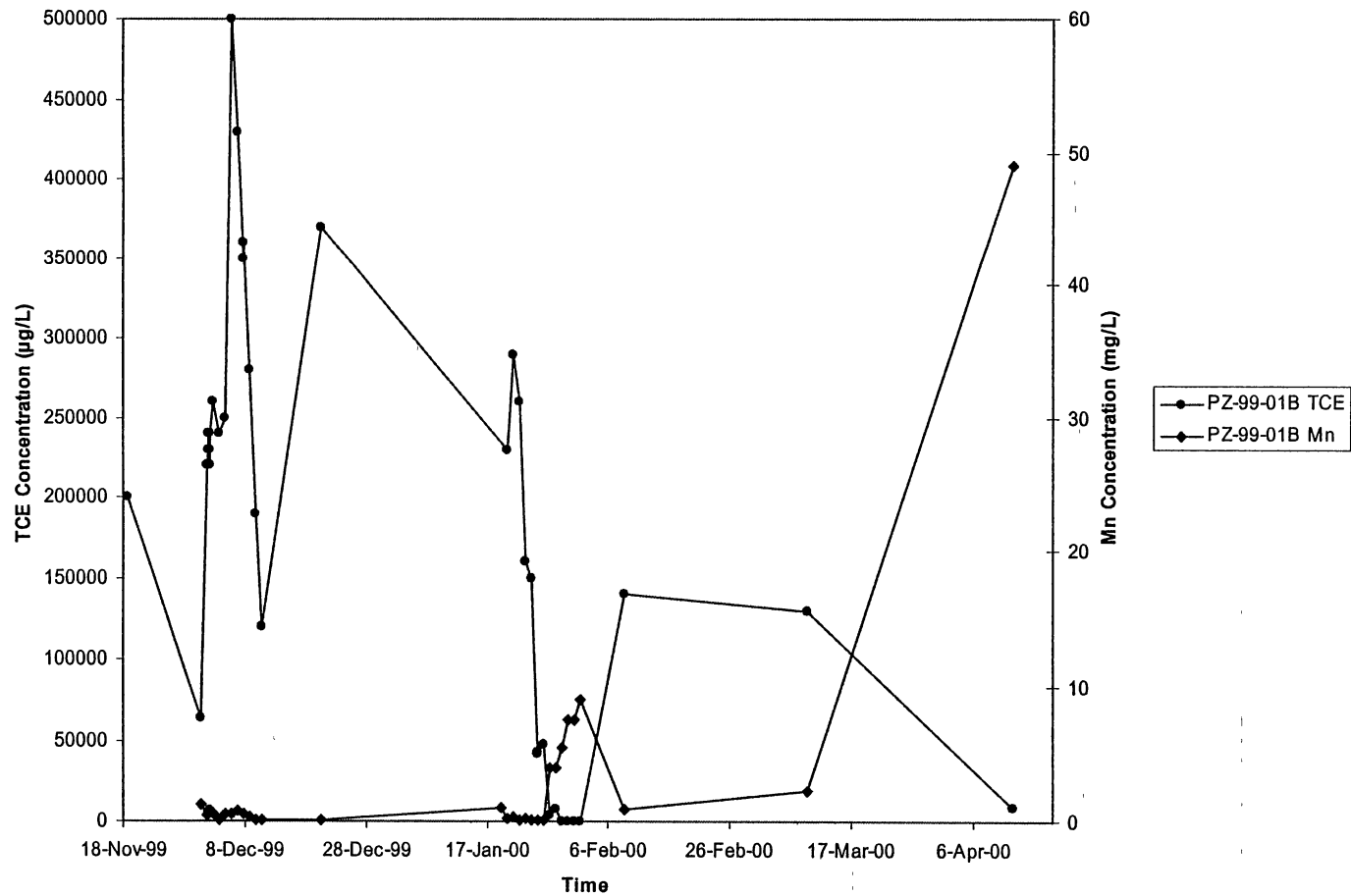
Carbon Treatment Units



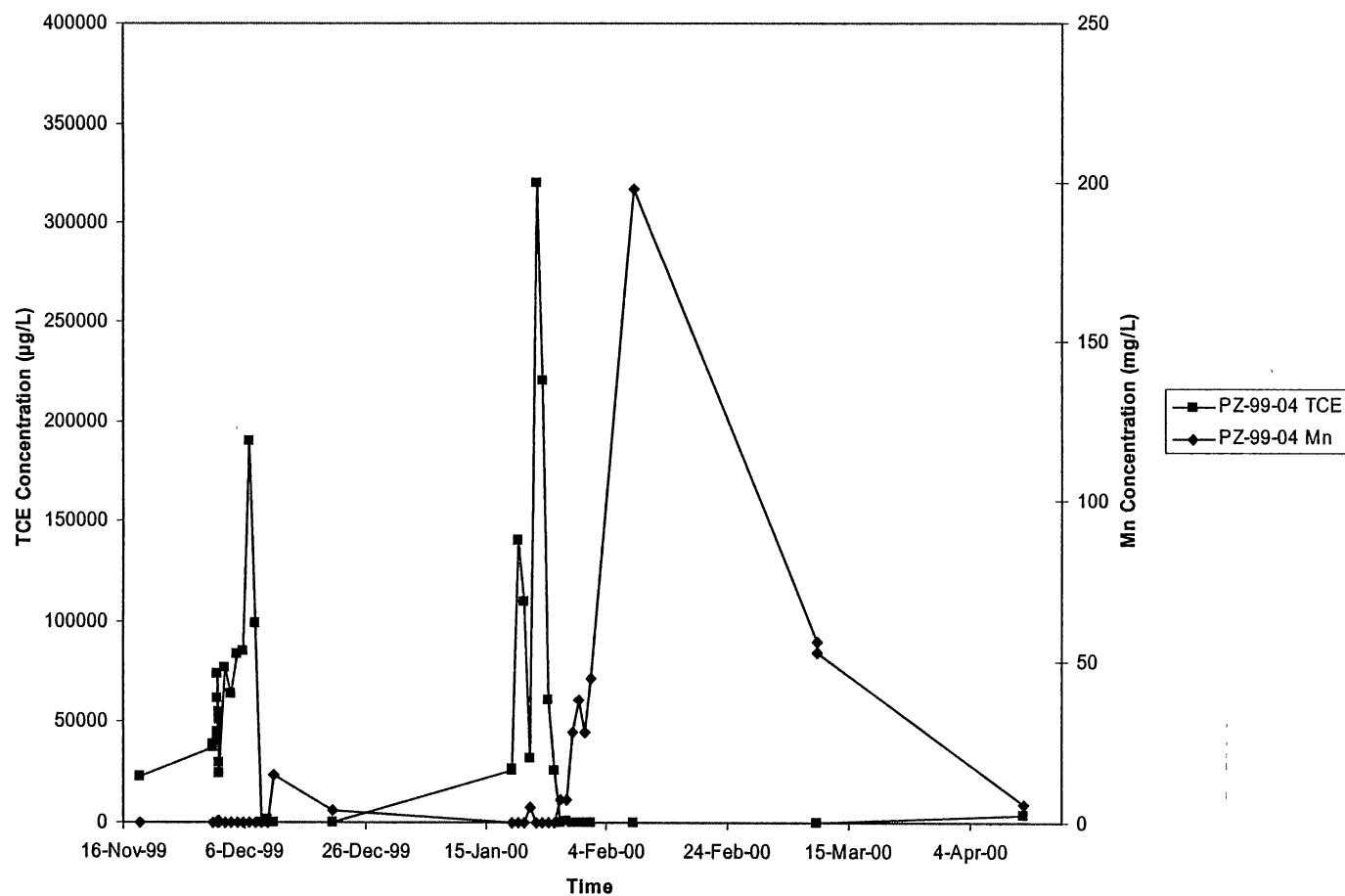
TCE Area - EW-99-02



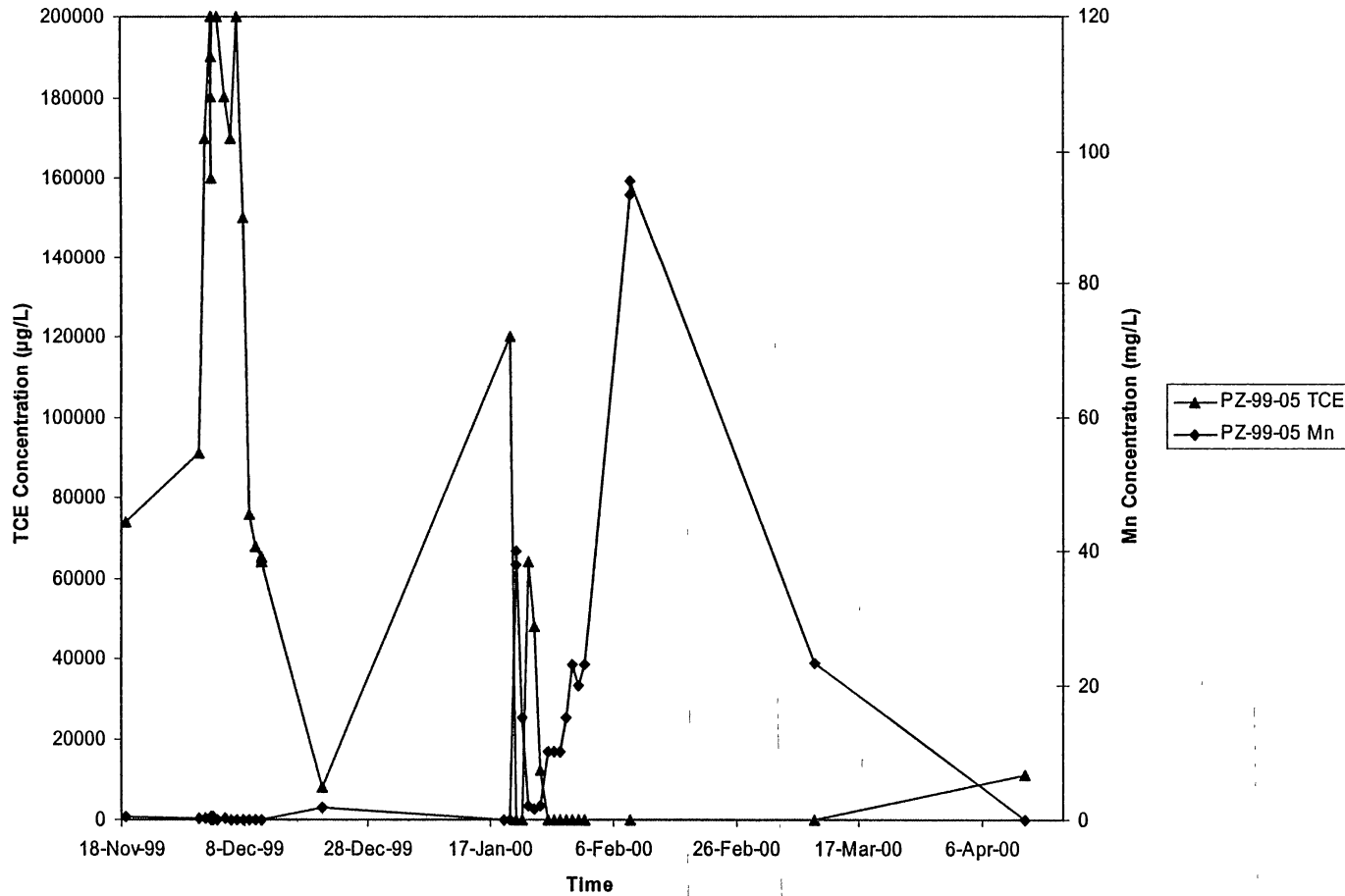
TCE Area - PZ-99-01B



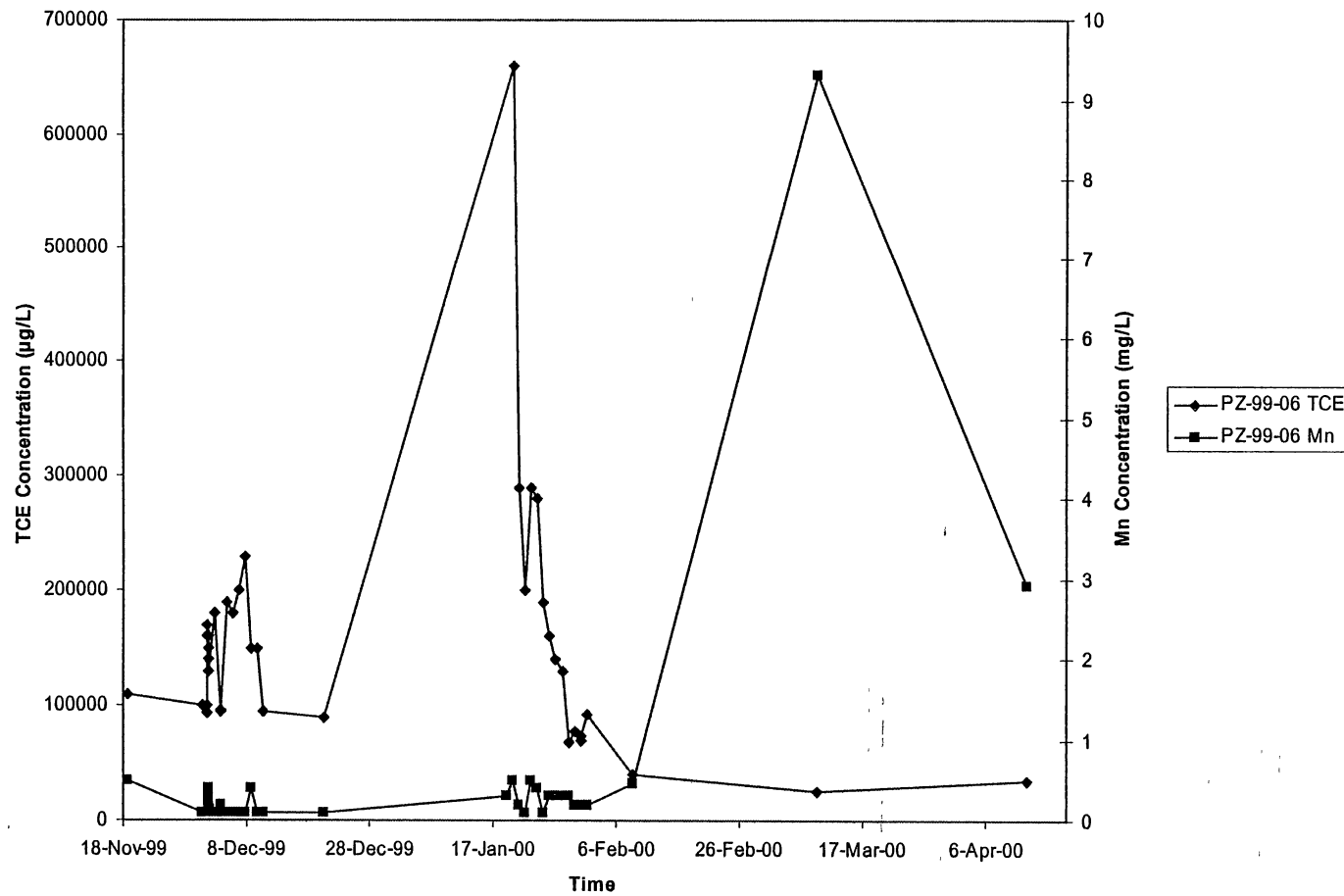
TCE Area - PZ-99-04



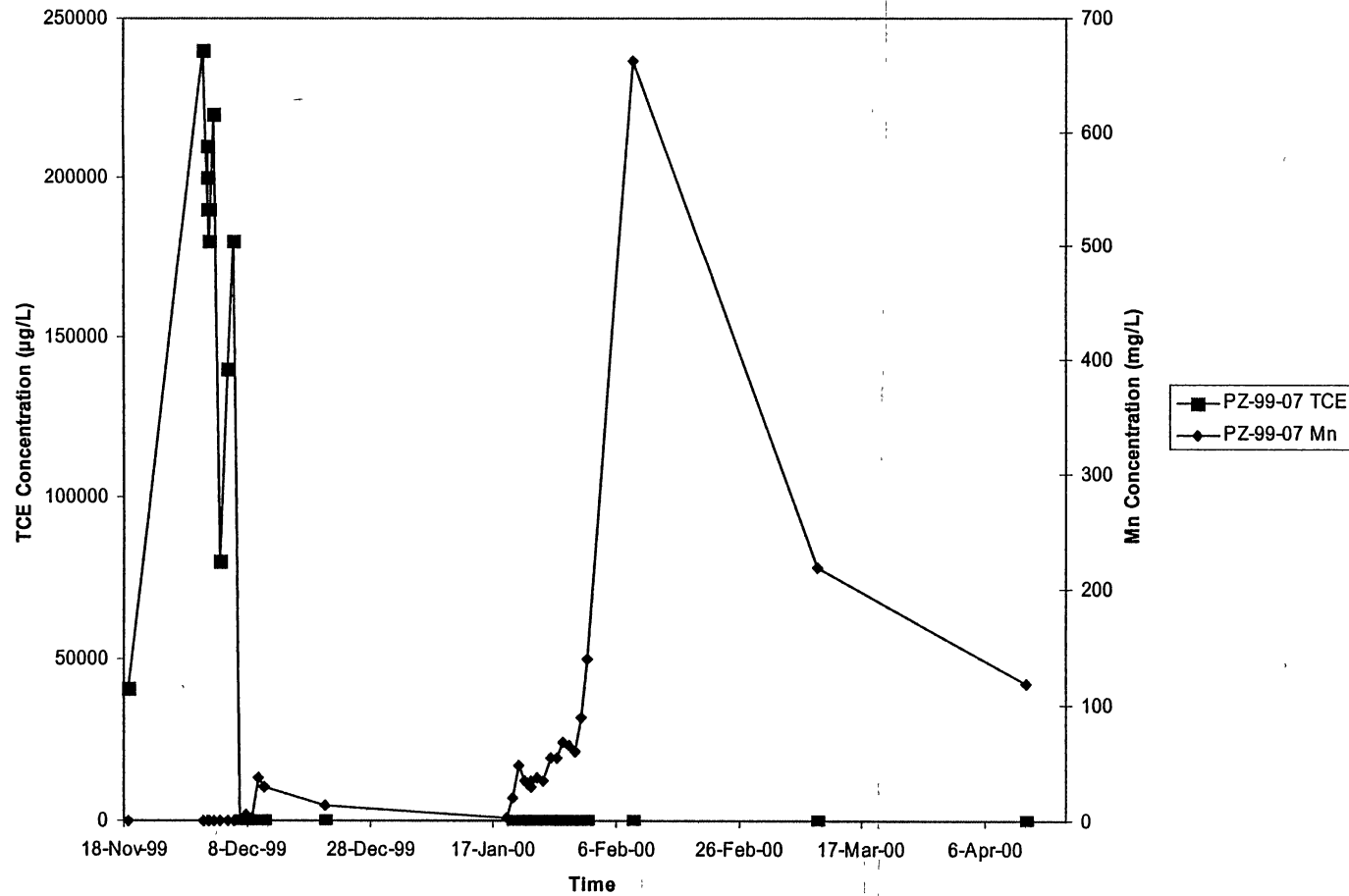
TCE Area - PZ-99-05



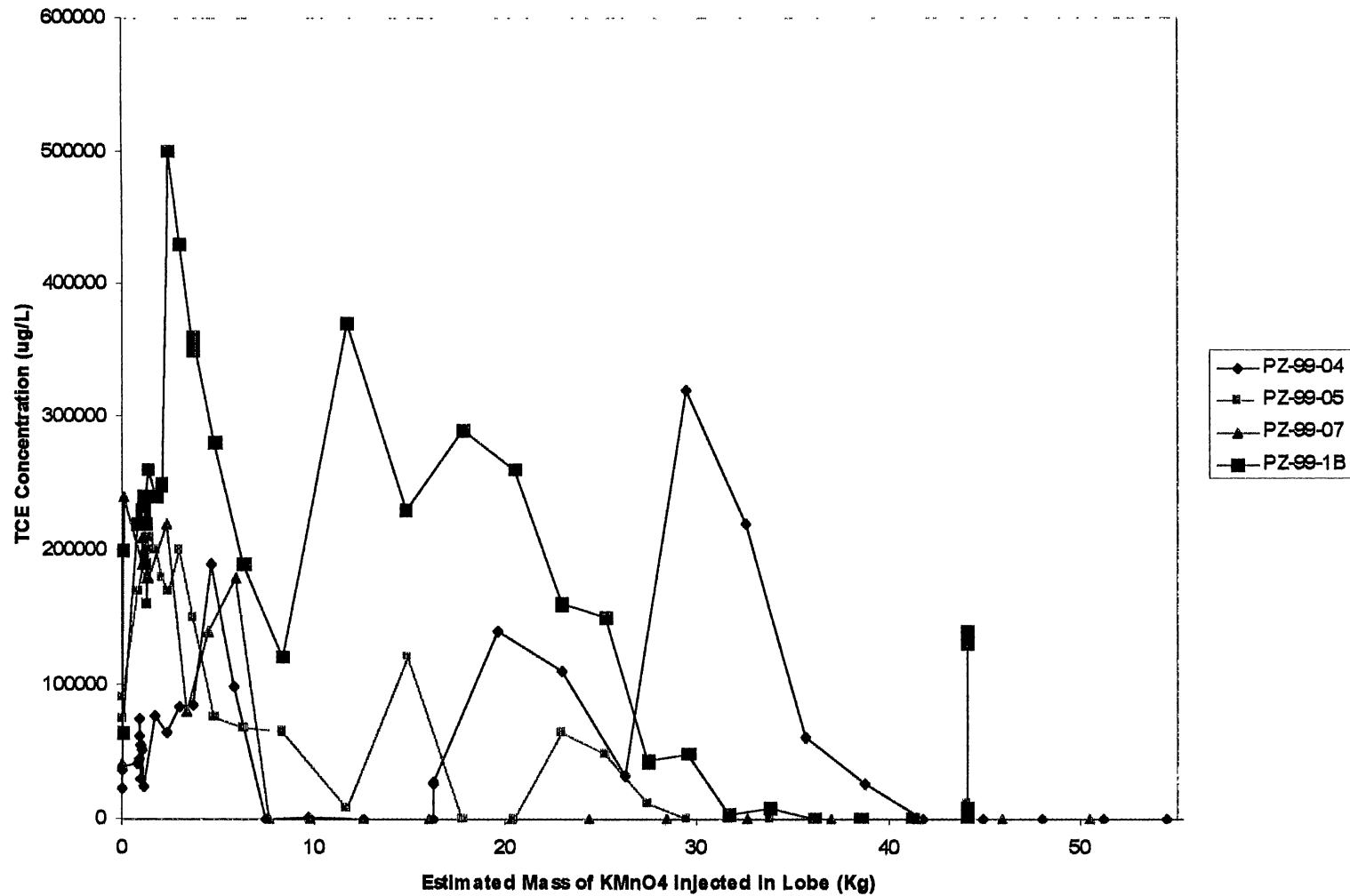
TCE Area - PZ-99-06



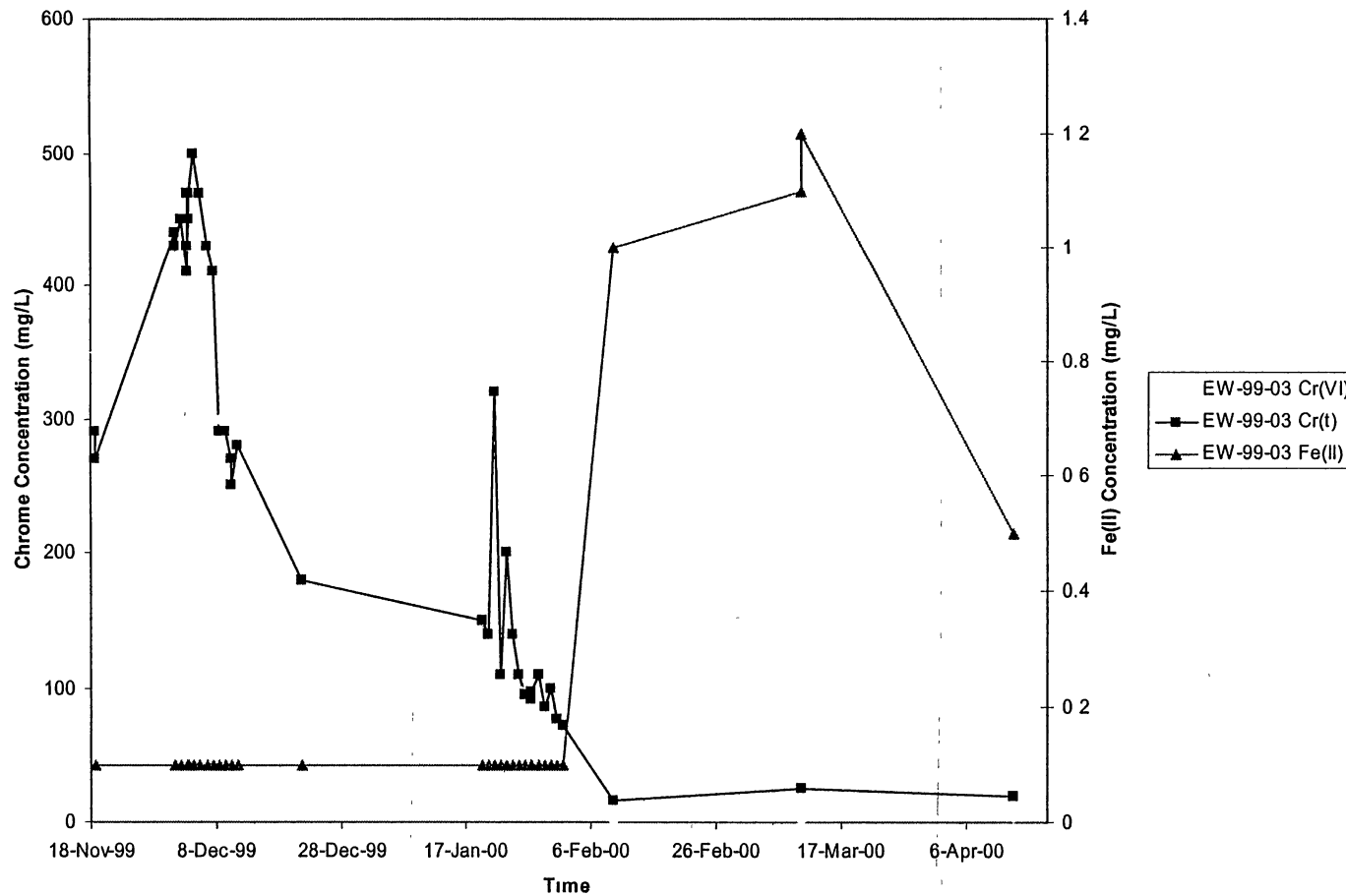
TCE Area - PZ-99-07



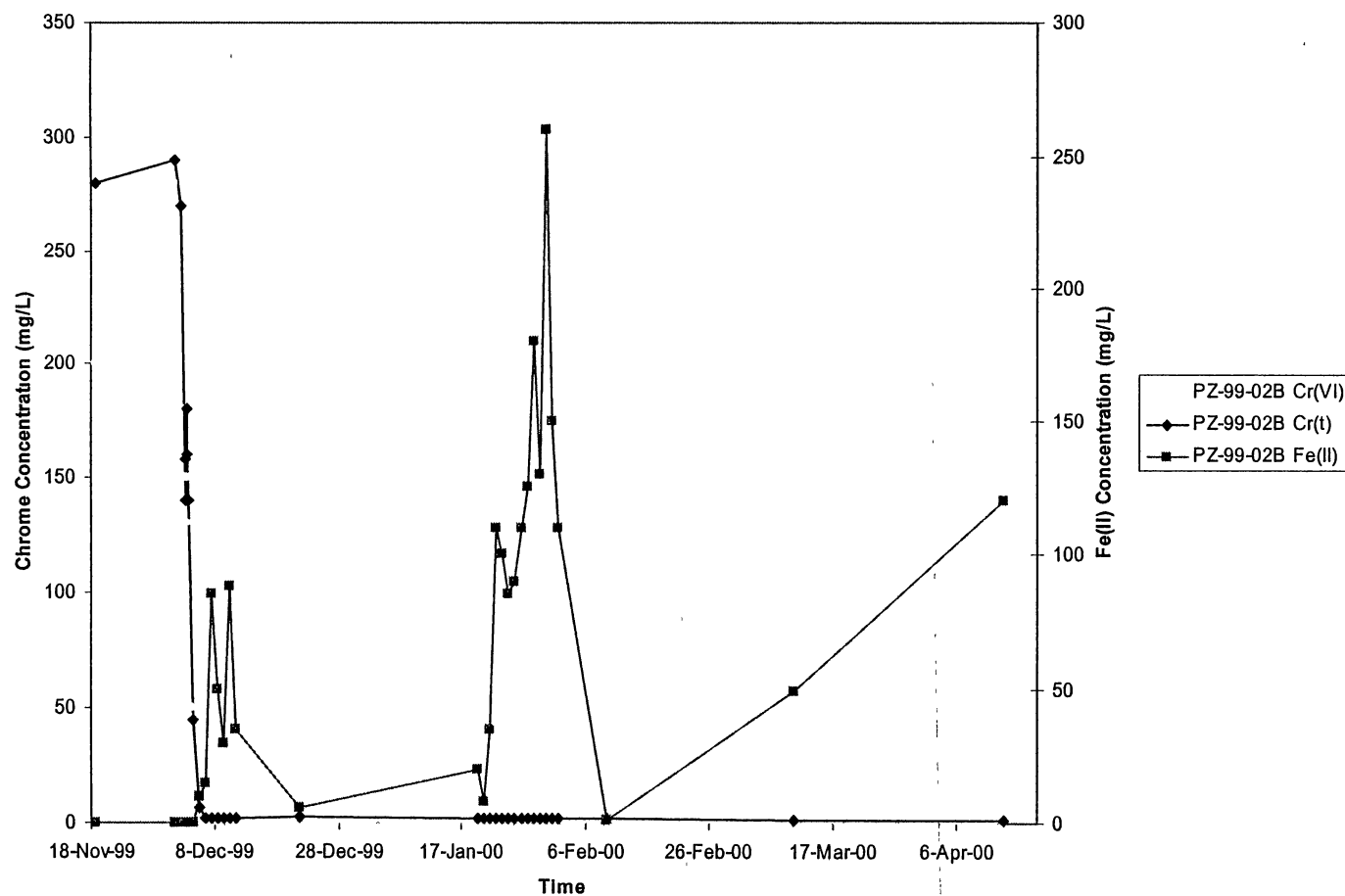
TCE Area - Effect of KMnO4 Dose



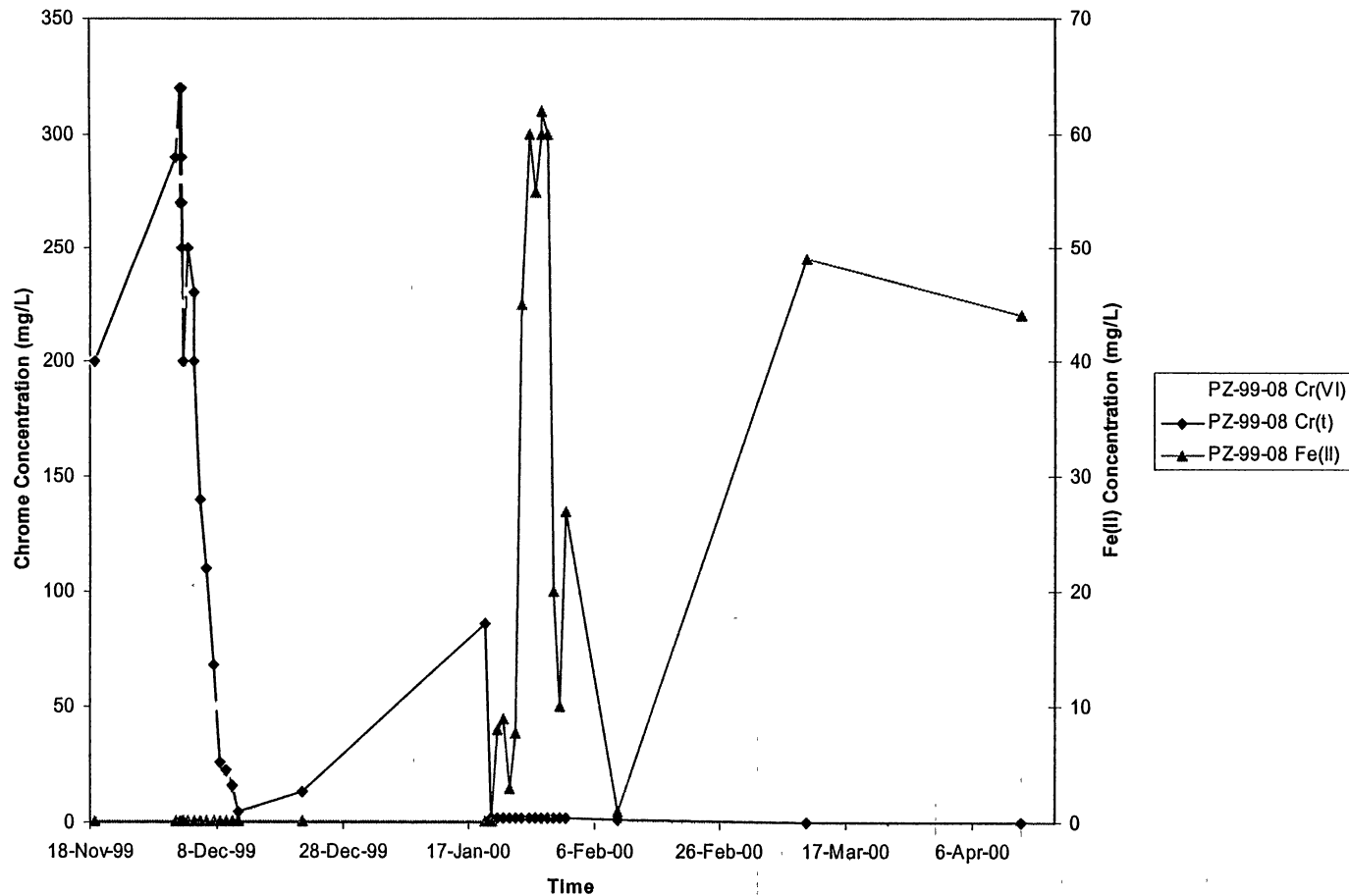
Hexavalent Chrome Area - EW-99-03



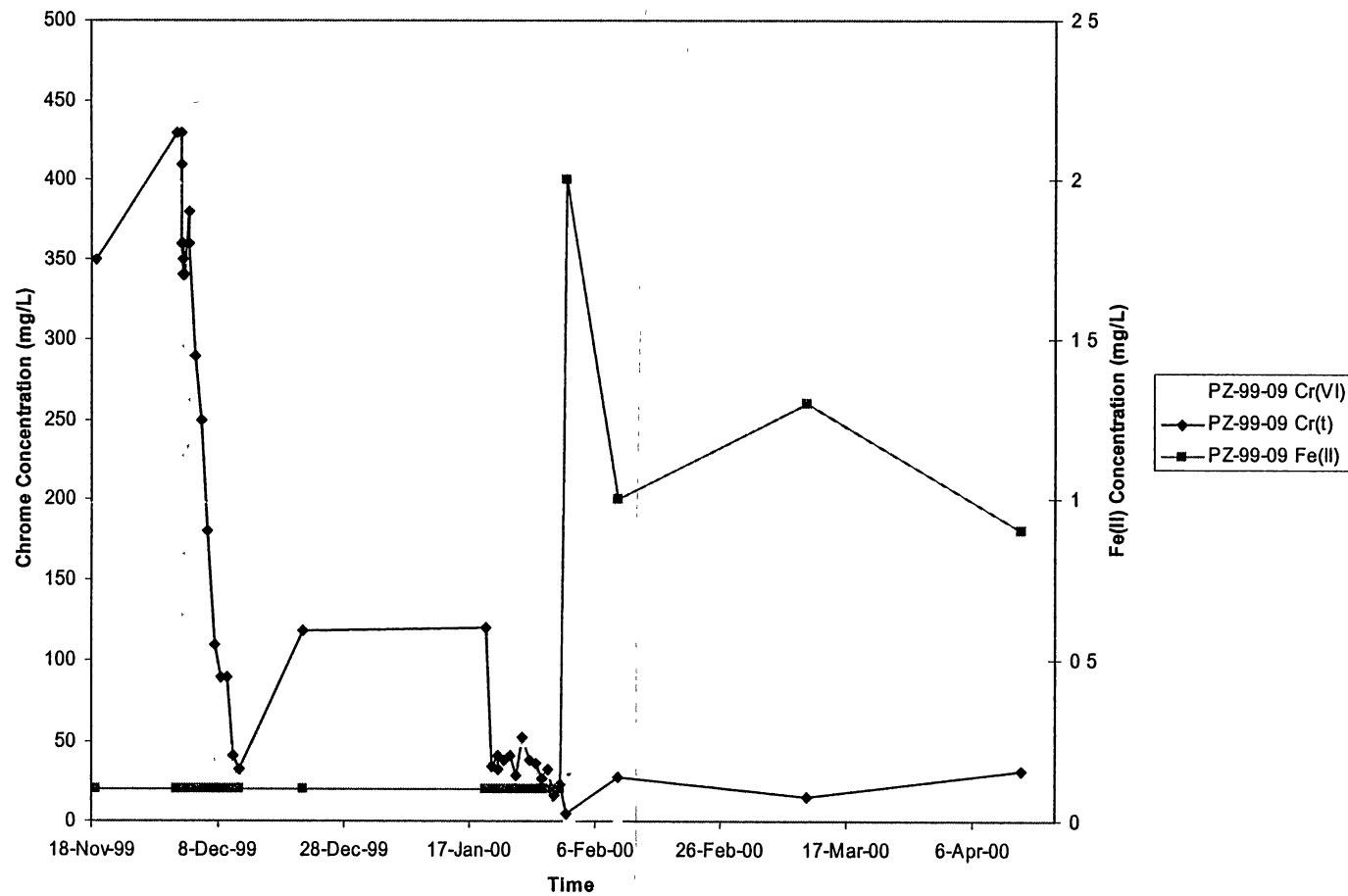
Hexavalent Chrome Area - PZ-99-02B



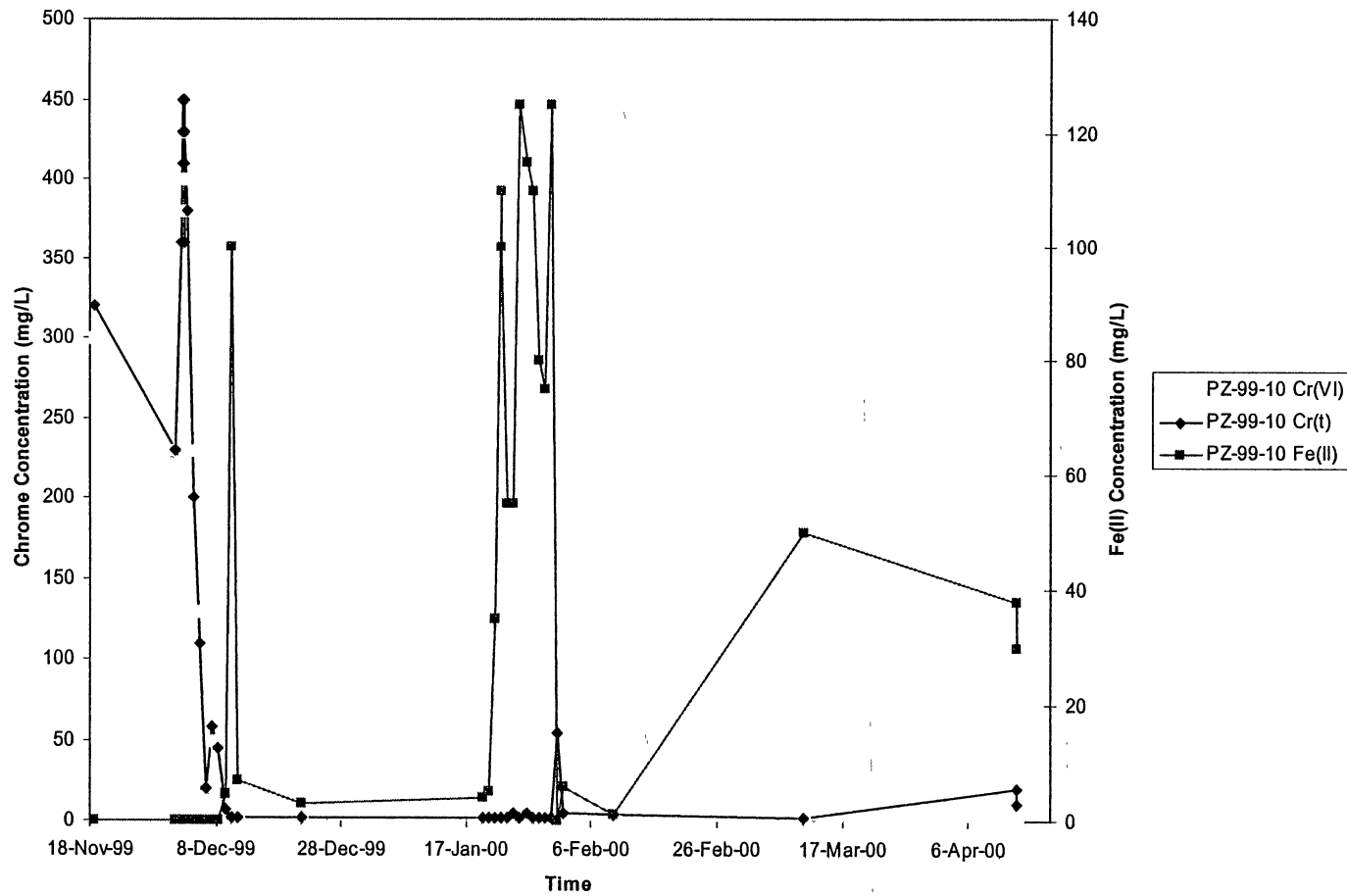
Hexavalent Chrome Area - PZ-99-08



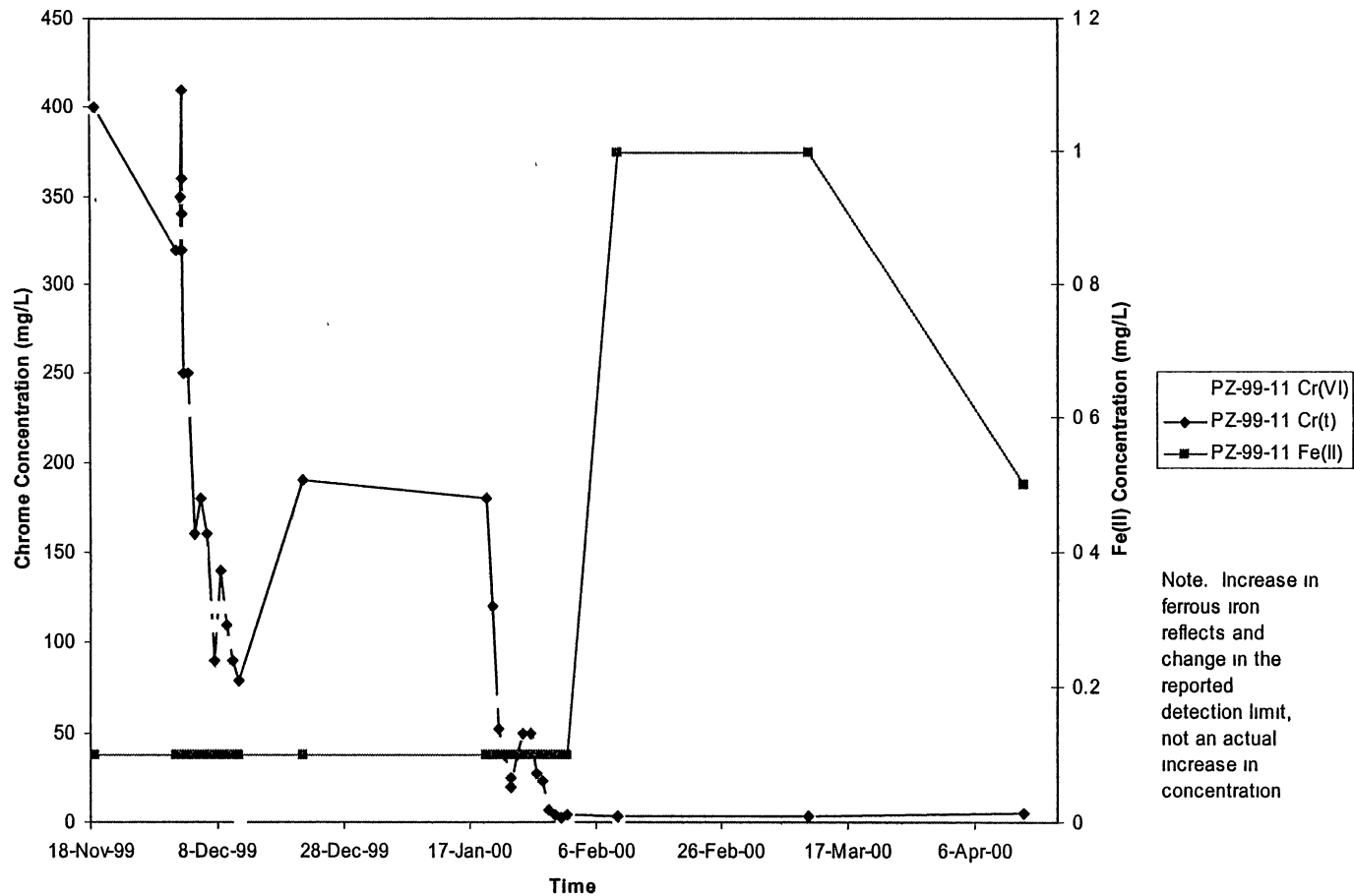
Hexavalent Chrome Area - PZ-99-09



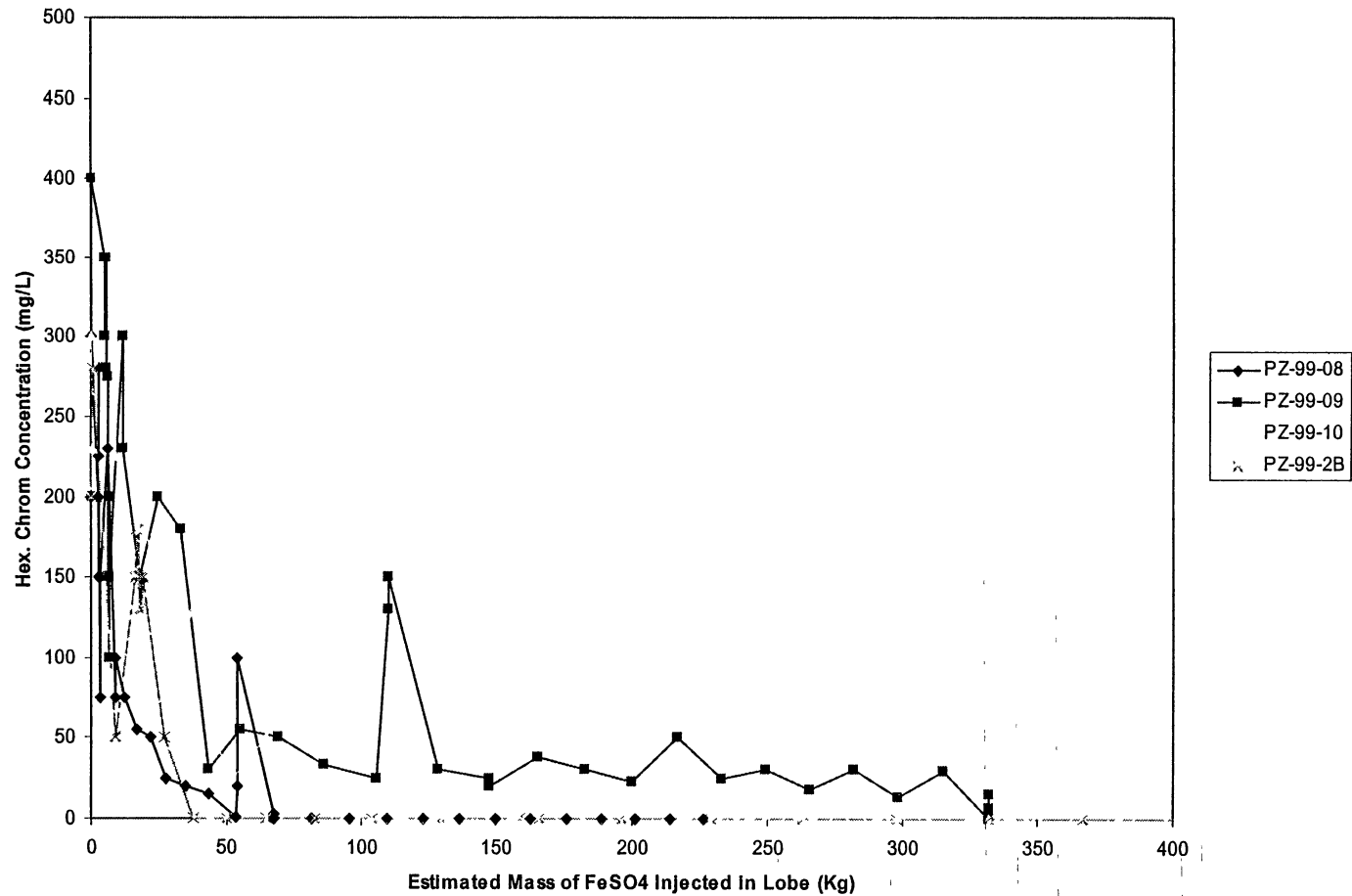
Hexavalent Chrome Area - PZ-99-10



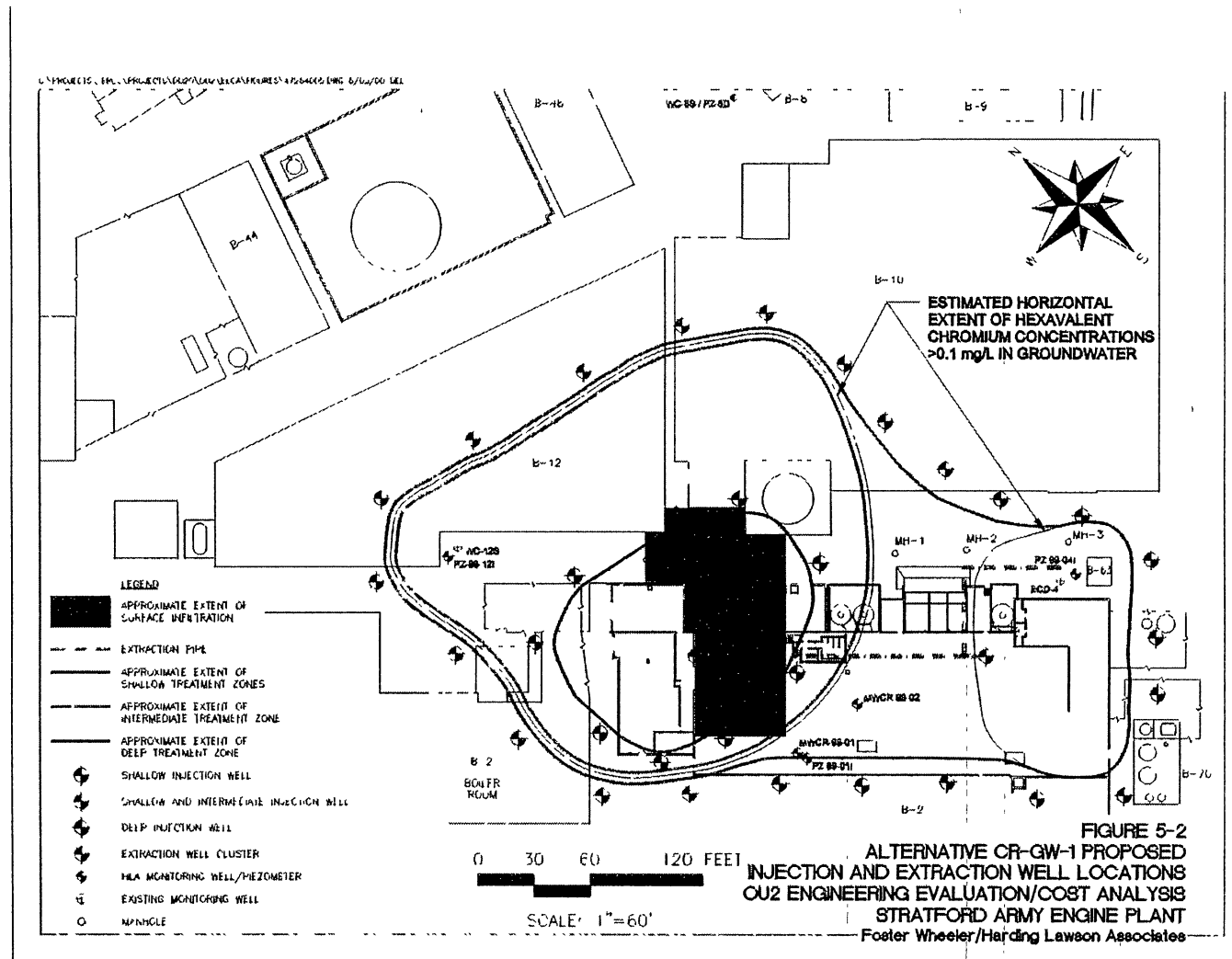
Hexavalent Chrome Area - PZ-99-11



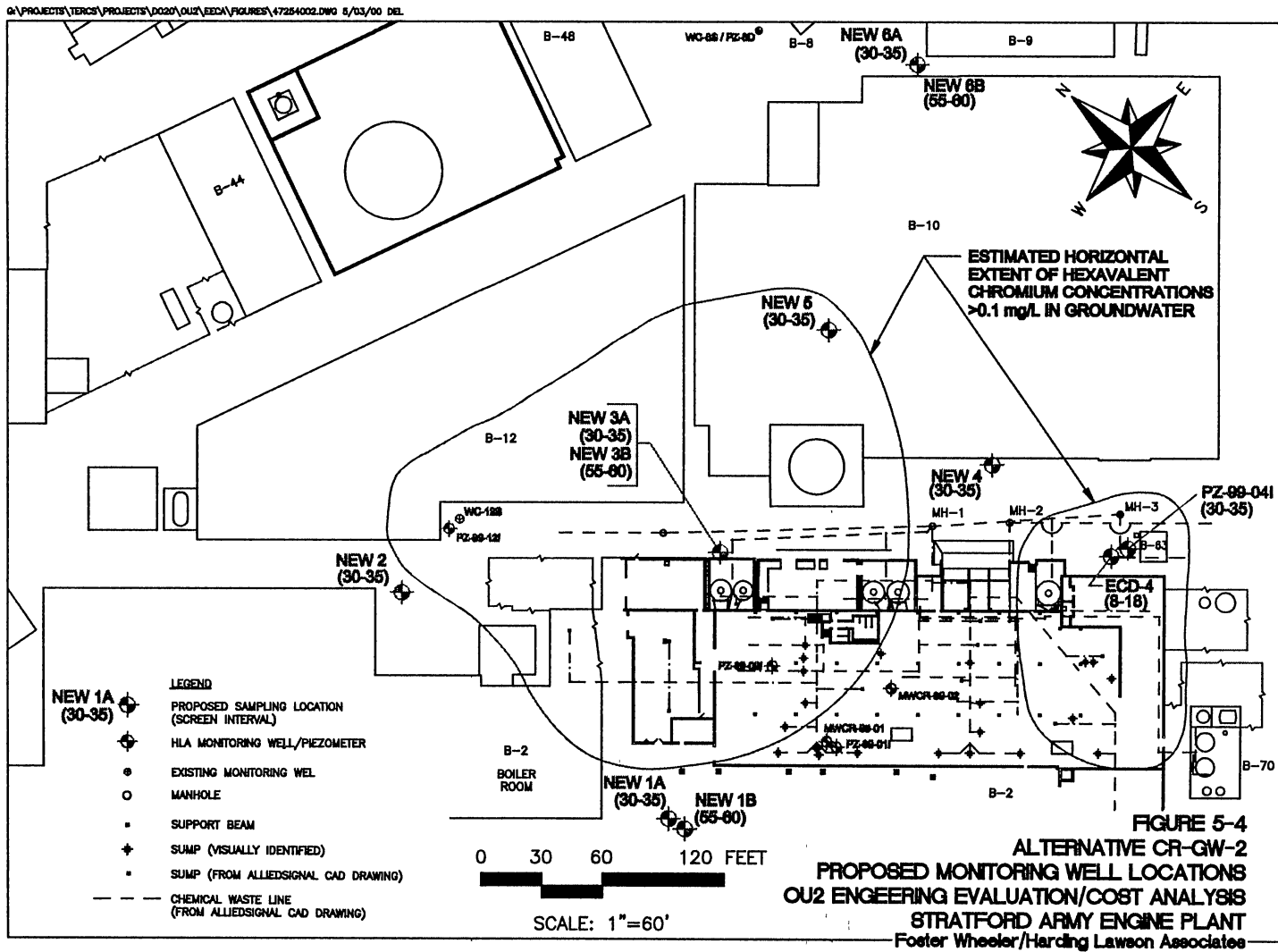
Chrome Area - Effect of FeSO4 Dose



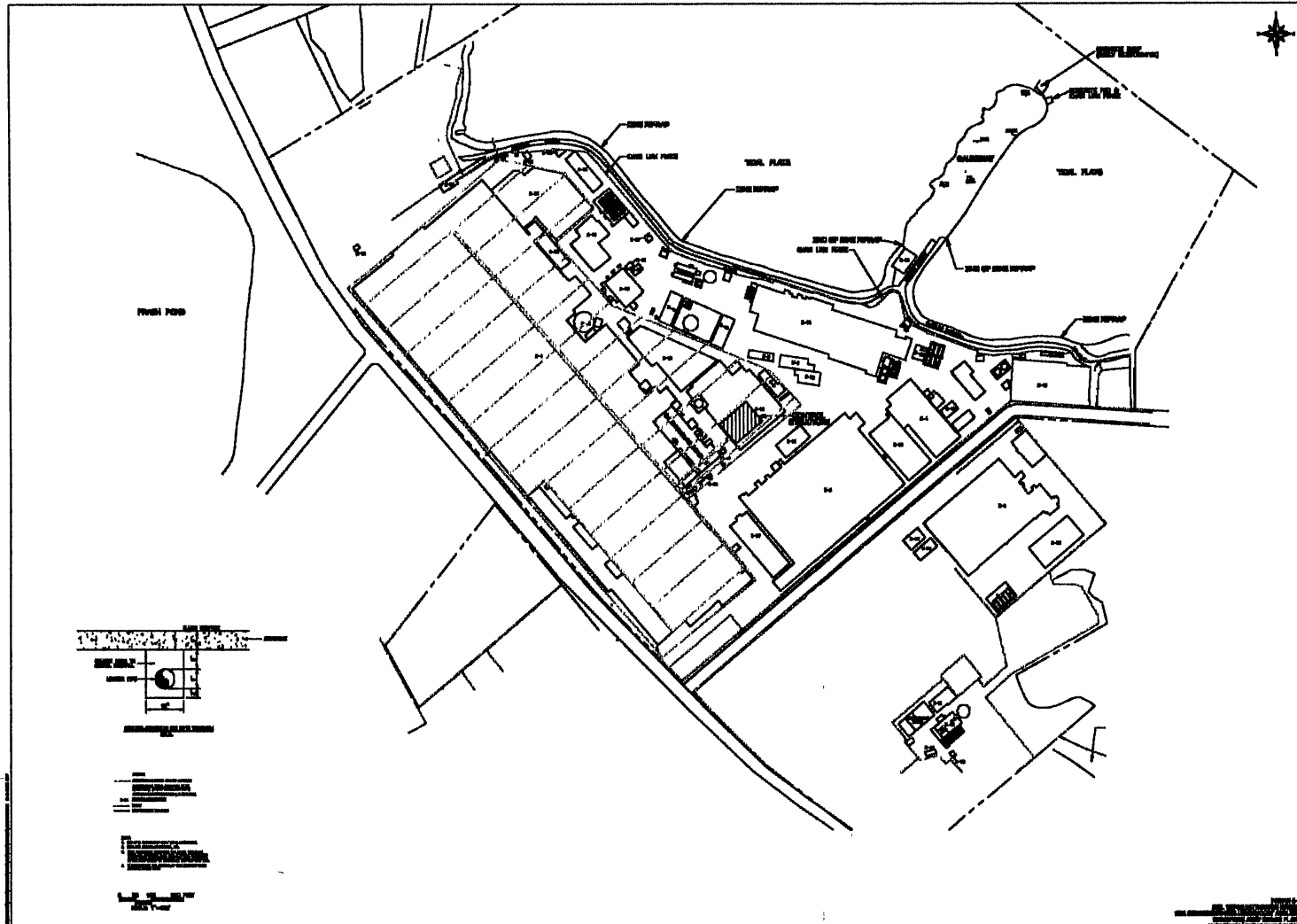
Alternative CR-GW-1 - In-situ Reduction Layout



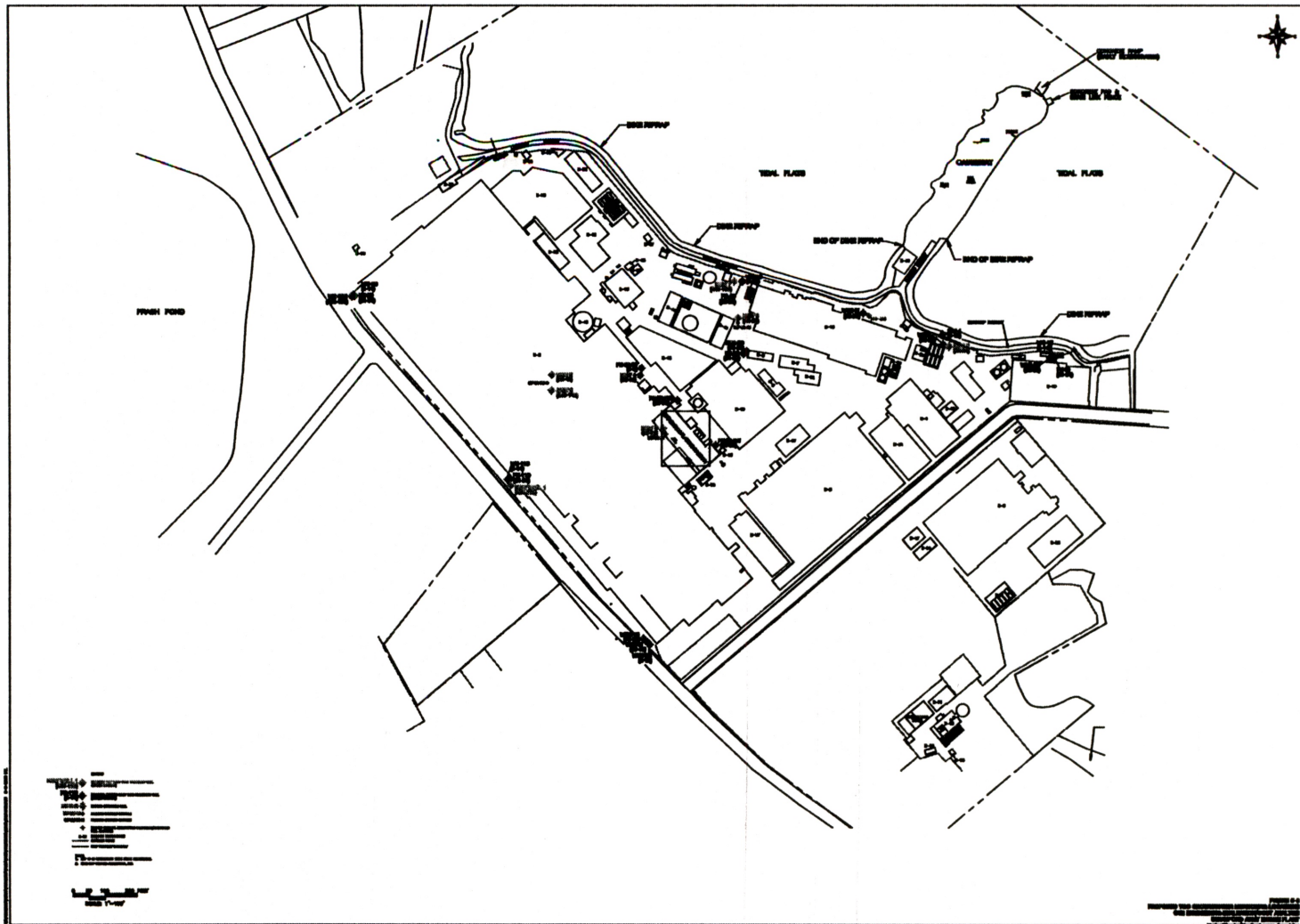
Alternative CR-GW-2 - Groundwater Monitoring



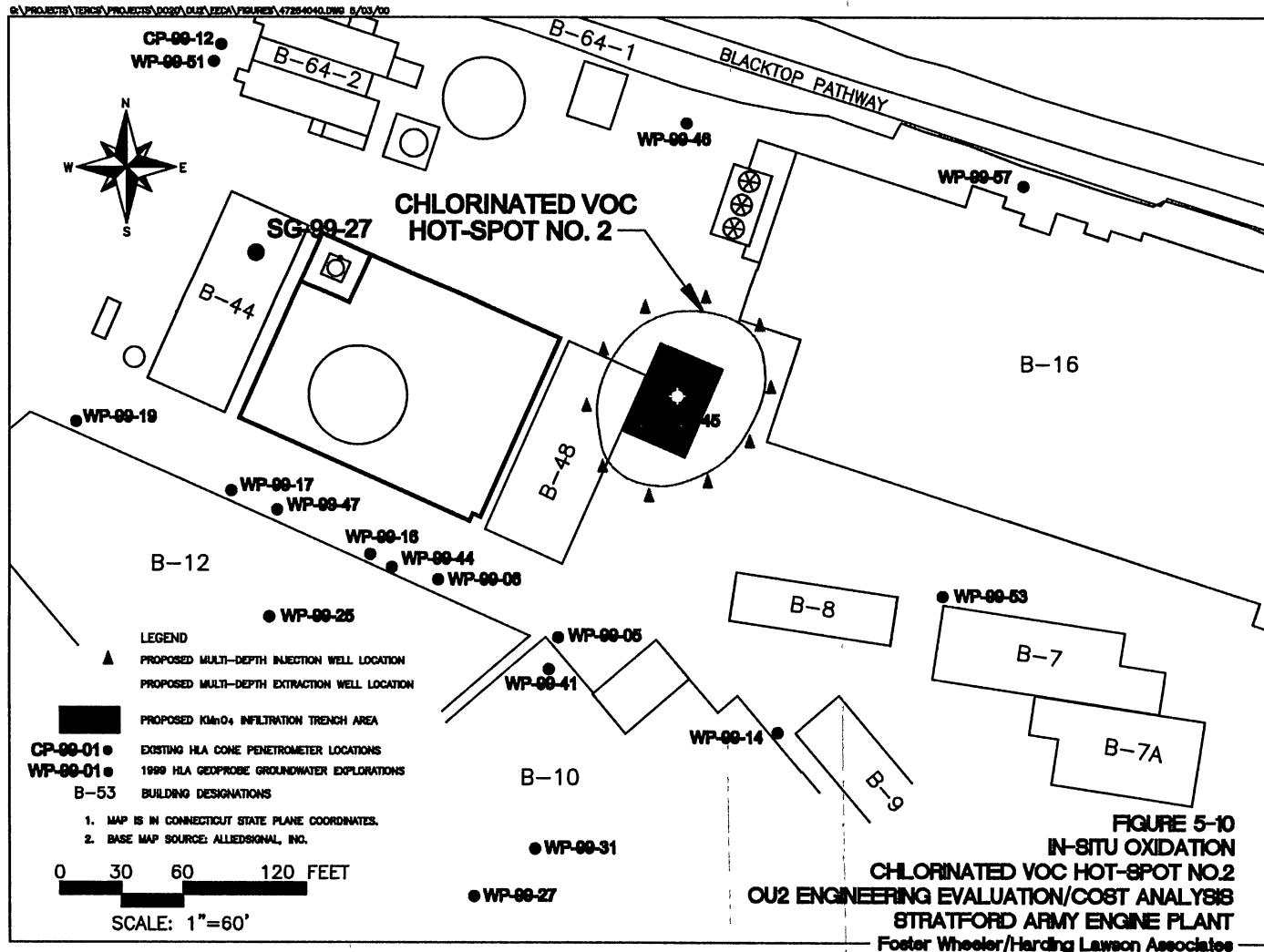
Alternative VOC-1 - Soil Vapor Extraction Layout



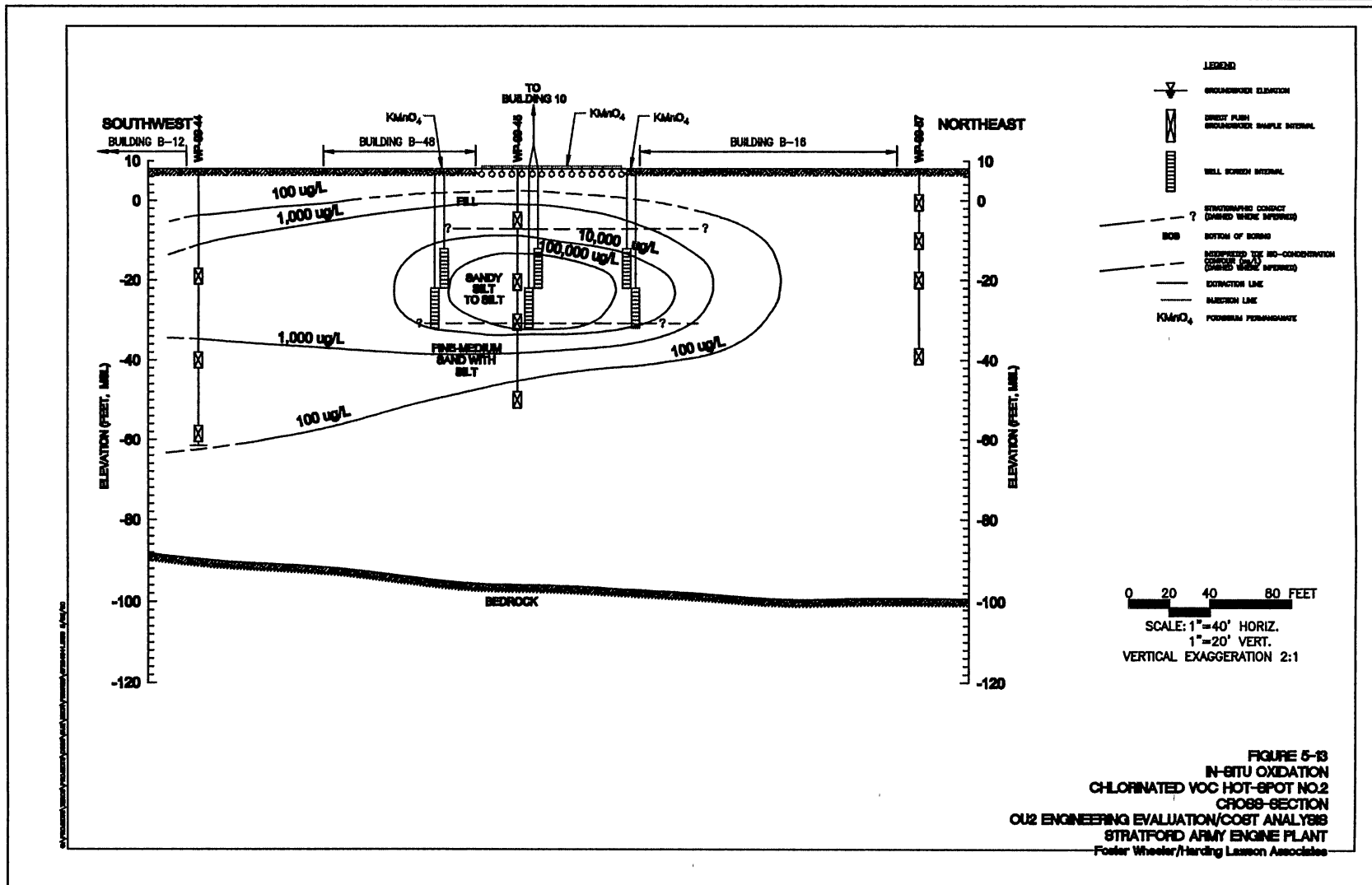
Alternative VOC-1 - Groundwater Monitoring



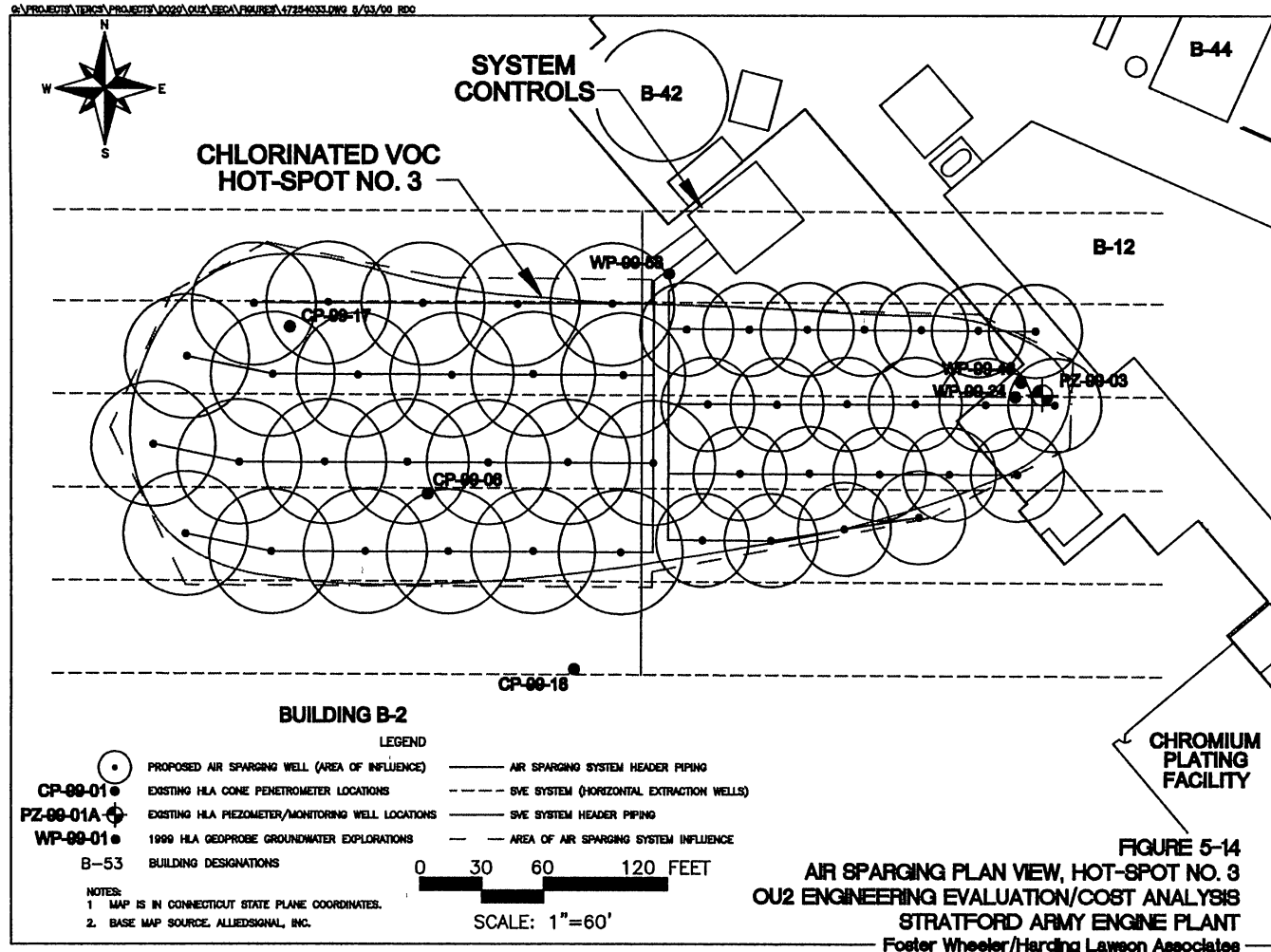
Alternative VOC-2 - In-situ Chemical Oxidation Layout



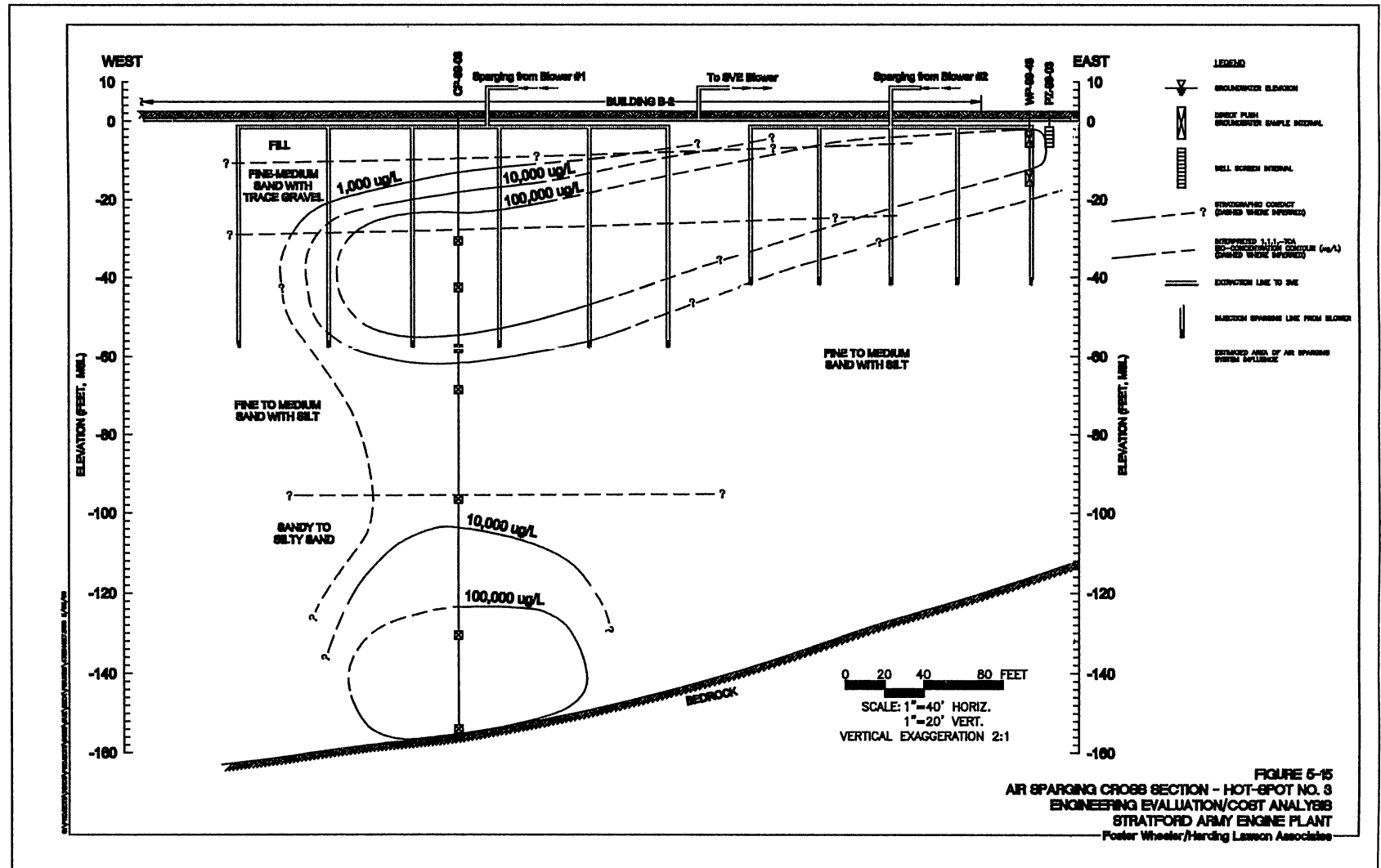
Alternative VOC-2 - In-situ Chemical Oxidation Cross Section



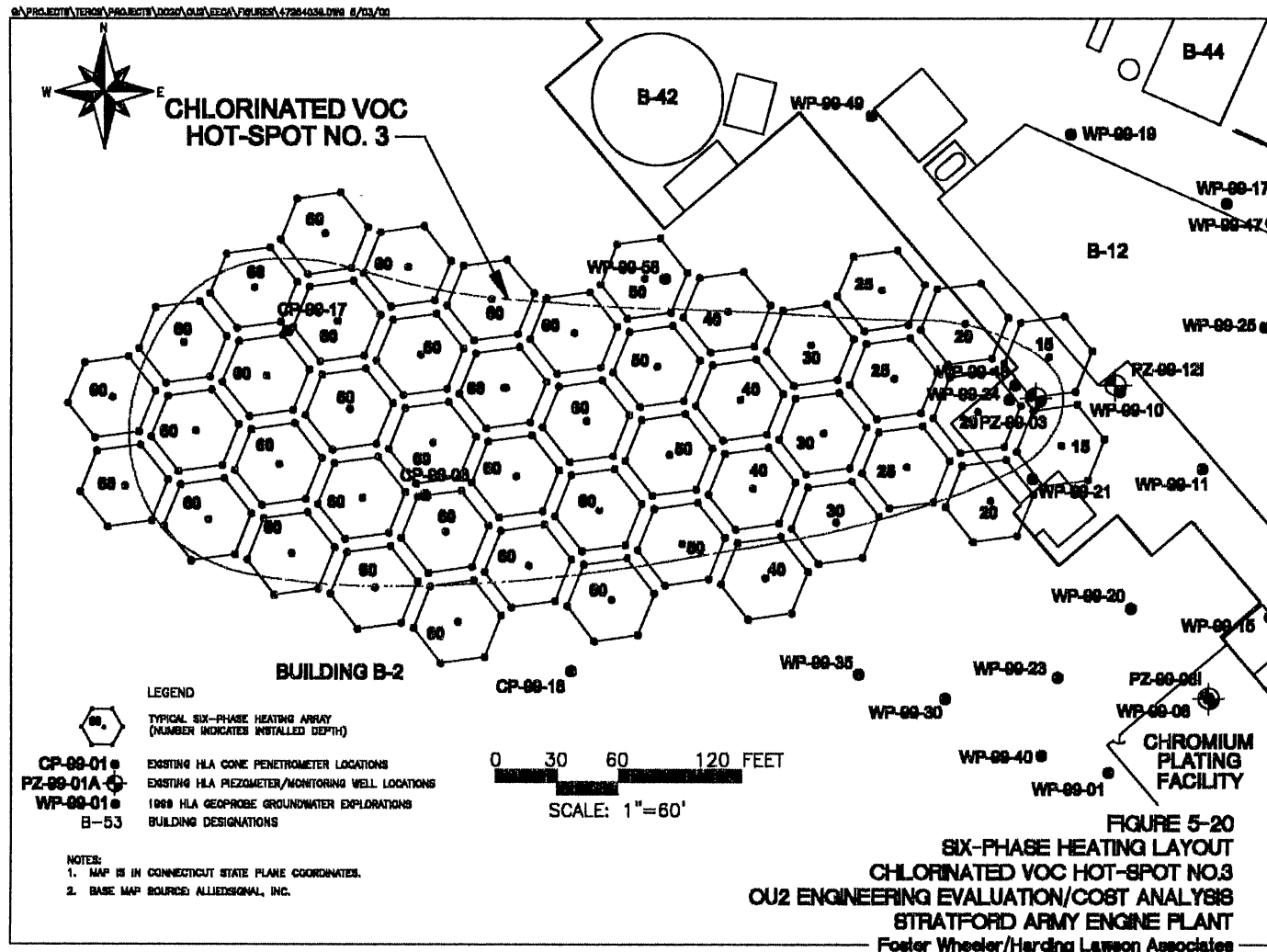
Alternative VOC-2 - Air Sparging Layout



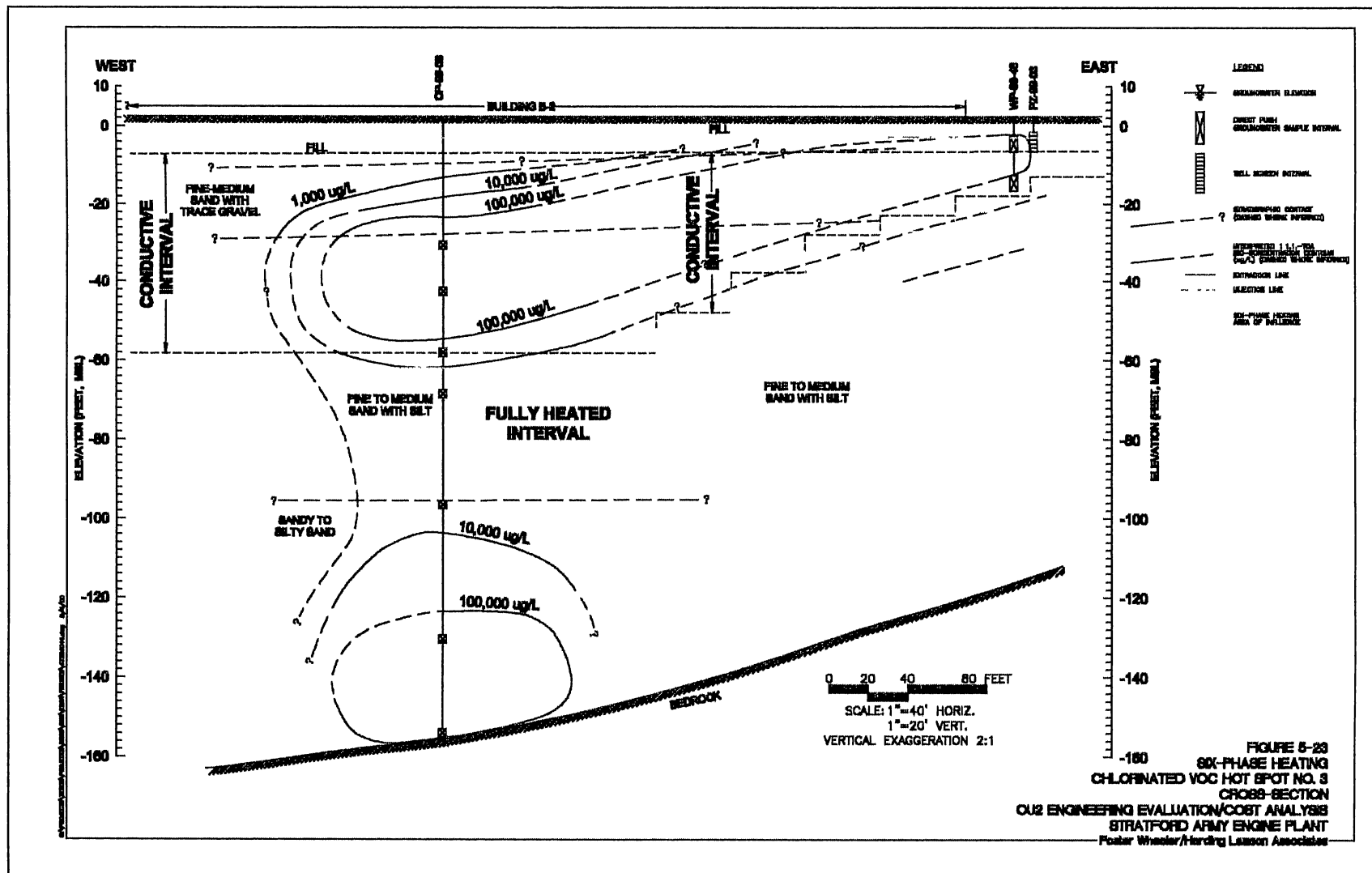
Alternative VOC-2 - Air Sparging Cross Section



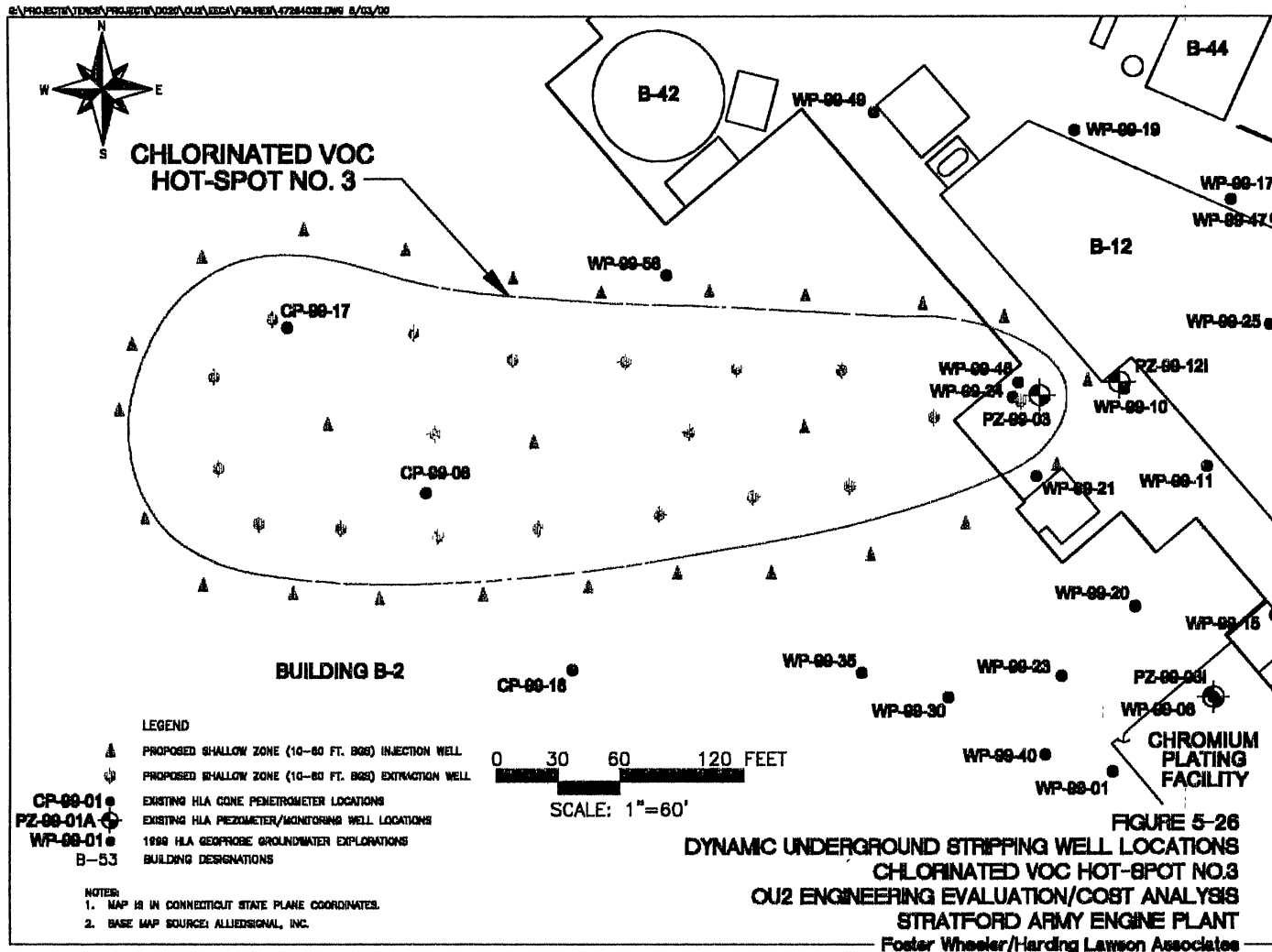
Alternative VOC-3 - Six-phase Heating Layout



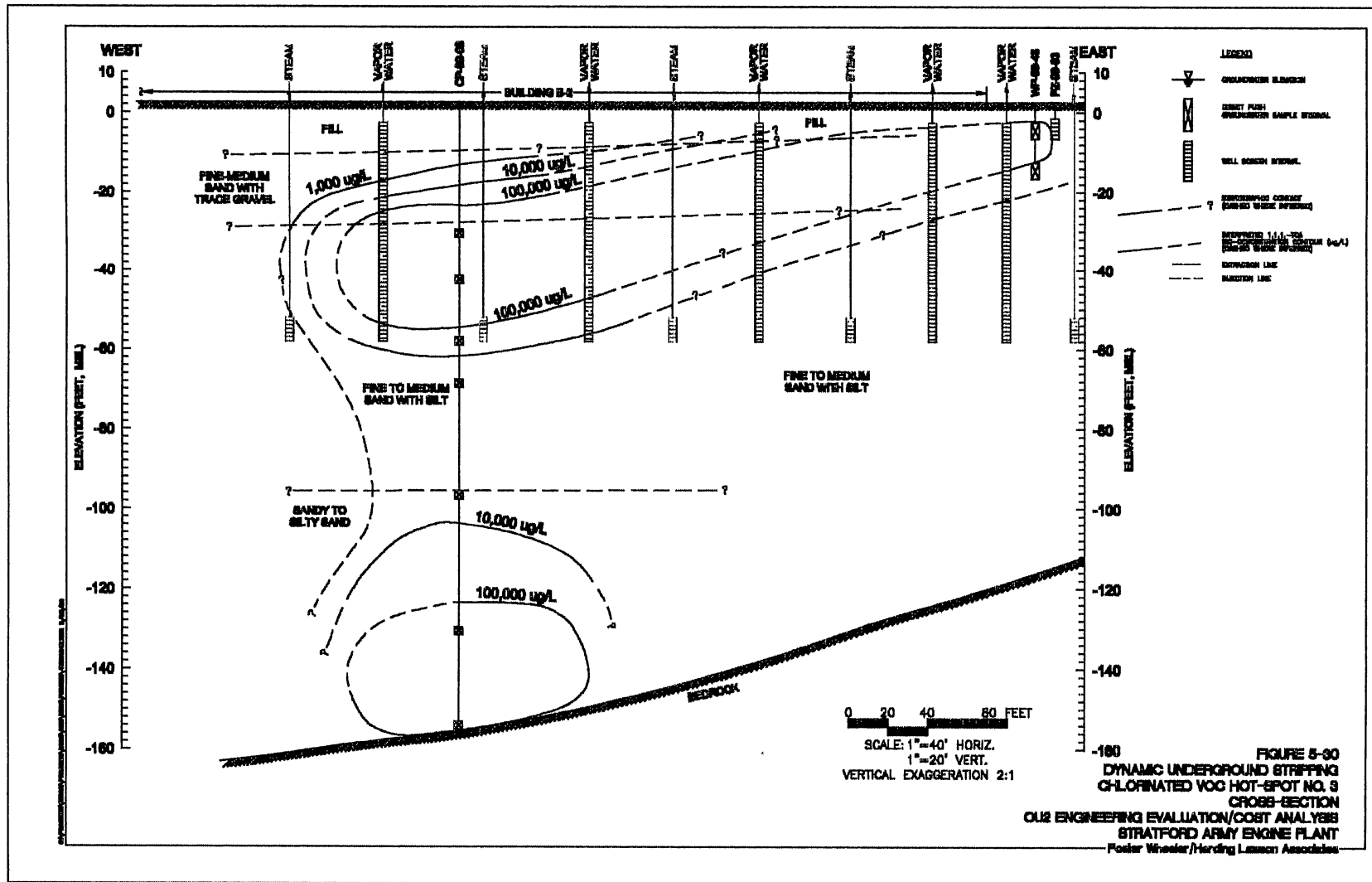
Alternative VOC-3 - Six-phase Heating Cross Section



Alternative VOC-3 - Dynamic Underground Stripping Layout



Alternative VOC-3 - Dynamic Underground Stripping Cross Section



Comparative Analysis of Alternatives - Chromium Structures

Nine Criteria	Wall Removal/ Beam Decontamination/Floor Removal and Replacement	Wall Removal/ Beam Decontamination/ New Floor Over Old
Protects human health and environment	⊕	⊕
Meets Federal and State requirements	⊕	○
Provides long-term protection	⊕	⊕
Reduces mobility, toxicity or volume through treatment	⊖	⊖
Provides short-term protection	⊕	⊕
Can be implemented	⊕	⊕
Cost	Capital: \$772,000 O&M: \$47,000	Capital: \$693,000 O&M: \$47,000
State Agency Acceptance	To be determined after the public comment period.	
Community Acceptance	To be determined after the public comment period.	

⊖ Does not meet criteria

⊕ Meets or exceeds criteria

○ Partially meets criteria

Comparative Analysis of Alternatives - Chromium Groundwater

Nine Criteria	In-situ Reduction	Groundwater Monitoring
Protects human health and environment	⊕	⊕
Meets Federal and State requirements	⊕	○
Provides long-term protection	⊕	○
Reduces mobility, toxicity or volume through treatment	⊕	⊖
Provides short-term protection	⊕	⊕
Can be implemented	⊕	⊕
Cost	Capital: \$3.65 M O&M: \$310,000	Capital: \$403,000 O&M: \$457,000
State Agency Acceptance	To be determined after the public comment period.	
Community Acceptance	To be determined after the public comment period.	

⊖ Does not meet criteria

⊕ Meets or exceeds criteria

○ Partially meets criteria

Comparative Analysis of Alternatives - VOC Groundwater

Nine Criteria	SVE and Groundwater Monitoring	Oxidation/AirSparging/ SVE/Groundwater Monitoring	Thermal Treatment/ SVE/ Groundwater Monitoring
Protects human health and environment	⊕	⊕	⊕
Meets Federal and State requirements	○	○	⊕
Provides long-term protection	⊕	⊕	⊕
Reduces mobility, toxicity or volume through treatment	○	○	⊕
Provides short-term protection	⊕	⊕	⊕
Can be implemented	⊕	⊕	⊕
Cost	Capital: \$5.03 M O&M: \$4.01 M	Capital: \$17.1 M O&M: \$8.83 M	Capital: \$20.0 M/\$16.6 M O&M: 4.01 M/\$4.54 M
State Agency Acceptance	To be determined after the public comment period.		
Community Acceptance	To be determined after the public comment period.		

⊖ Does not meet criteria

⊕ Meets or exceeds criteria

○ Partially meets criteria