

Interim Remedial Action Plan

**Former American Beryllium
Company Site
1600 Tallevast Road
Tallevast, Florida**

December 2005

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Engineers Certification

This Interim Remedial Action Plan for groundwater at the Former American Beryllium Company site located at 1600 Tallevast Road in Manatee County, Florida, dated December 2005, has been prepared in accordance with good scientific and engineering practices by individuals under my direct supervision and me. No other warranty is implied or intended.



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Abbreviations

ABC	American Beryllium Company
AF	Arcadia Formation
AMSL	Above Mean Sea Level
AOP	Advanced Oxidation Process
APT	Applied Process Technology, Inc.
BAP	Benzo(a)pyrene
BBL	Blasland, Bouck & Lee, Inc.
bgs	Below Ground Surface
BOD	Basis of Design
°C	Celsius
CAR	Contamination Assessment Report
CO ₂	Carbon Dioxide
COC	Chemicals of Concern
CSM	Conceptual Site Model
DCA	1,1-Dichloroethane
DCE	1,1-Dichloroethene
IRAP	Interim Remedial Action Plan
FAC	Florida Administrative Code
FAS	Floridian Aquifer System
FDEP	Florida Department of Environmental Protection
ft ² /day	Square Feet per Day
ft/day	Feet per Day
GAC	Granular Activated Carbon
GCTLs	Groundwater Cleanup Target Levels
gpm	Gallons per Minute
HCU	HiPOx Cabinet Unit
H ₂ O	Water
H ₂ O ₂	Hydrogen Peroxide
Hp	Horsepower
IAS	Intermediate Aquifer System
IRA	Interim Remedial Action
IRAP	Interim Remedial Action Plan
Lockheed Martin	Lockheed Martin Corporation
LSAS	Lower Surficial Aquifer System
MCUO	Manatee County Utility Operations
mg/L	Milligrams per Liter
NADCs	Natural Attenuation Default Concentrations
NAPL	Non-Aqueous Phase Liquid
O ₃	Ozone
O&M	Operation & Maintenance
OMM	Operation, Maintenance, and Monitoring
PAT	Pump-and-Treat
PCE	Tetrachloroethene
Pd	Palladium
PLC	Programmable Logic Controller
POTW	Publicly Owned Treatment Works
PRF	Peace River Formation

Psi	Pounds per Square Inch
Pt	Platinum
Punifics	Punifics ES, Inc.
PVC	Polyvinyl Chloride
RAP	Remedial Action Plan
RAWP	Remedial Action Work Plan
SARA	Site Assessment Report Addendum
SAS	Surficial Aquifer System
Sch	Schedule
SWFWMD	Southwest Florida Water Management District
TCE	Trichloroethene
TetraTech	TetraTech, Inc.
TiO ₂	Titanium Dioxide
TPH	Total Petroleum Hydrocarbons
USAS	Upper Surficial Aquifer System
USEPA	United States Environmental Protection Agency
UV	Ultraviolet
UVOx	Ultraviolet Oxidation
VOCs	Volatile Organic Compounds

1. Introduction

This document presents an Interim Remedial Action Plan (IRAP) for groundwater at the former American Beryllium Company (ABC) property located at 1600 Tallevast Road in Tallevast, Manatee County, Florida (Site). Lockheed Martin Corporation (Lockheed Martin) intends to implement this IRAP at the Site as an initial phase of active groundwater remediation while site assessment activities are being completed. After the site assessment is complete, a Final Remedial Action Plan (RAP) will be developed for full-scale rehabilitation of groundwater at the Site and surrounding areas.

This IRAP involves the installation, operation, and monitoring of a groundwater pump-and-treat (PAT) system around the source area of the Site. The purposes of the PAT system are to expedite mass removal and destruction of chemicals of concern (COC), and to provide hydraulic containment of the source area. Implementing this strategy is beneficial because it will significantly reduce the potential off-site migration of groundwater containing the highest COC concentrations. Moreover, operation of the PAT system will also improve groundwater quality in areas adjacent to the Site. A remedy that addresses the full extent of the groundwater plume will be provided in the Final RAP.

This report was prepared on behalf of Lockheed Martin by Blasland, Bouck & Lee, Inc. (BBL), and presents the design of the groundwater PAT system. The report also provides site assessment and pre-design investigation data that were relied on, as well as the design analyses performed during design activities. Included are plans to install, operate, and monitor the effectiveness of the PAT system. In addition, the PAT system will be monitored to determine its impact on the groundwater plume both on- and off-site.

1.1 Objectives

The objectives of this IRAP are as follows:

- Provide on-site hydraulic containment of groundwater containing the highest concentrations of COCs in the upper and lower surficial aquifer systems (USAS and LSAS) at the Site;
- Remove a significant amount of COC mass from the groundwater plume;
- Provide additional hydrogeologic information near the Site that will enable design of the full-scale groundwater remedy to be provided in the Final RAP; and
- Destroy COCs in extracted groundwater prior to discharge to the publicly owned treatment works (POTW) using technologies that will neither result in air emissions nor disrupt the aesthetic qualities of the neighborhood.

1.2 Regulatory Basis

This IRAP was developed in accordance with the Consent Order for the Site entered into voluntarily by Lockheed Martin and the Florida Department of Environmental Protection (FDEP). The File Number for the Consent Order is 04-1328 and the effective date is July 28, 2004. The Consent Order provides for the performance of site assessment and remediation activities by Lockheed Martin at the former ABC Site.

Lockheed Martin is currently implementing additional site assessment activities necessary to delineate the nature and extent of COCs in groundwater in accordance with the assessment requirements set forth in Chapter 62-780.600, Florida Administrative Code (F.A.C.). The results of these additional site assessment activities will be documented in the Site Assessment Report Addendum 3 (SARA 3) and submitted to FDEP. After FDEP approves the SARA 3, Lockheed Martin will submit a Final RAP also in accordance with applicable sections of Chapter 62-780, F.A.C. Contaminated Site Cleanup Criteria.

Since site assessment activities are not yet complete, this IRAP was prepared and will be implemented voluntarily by Lockheed Martin pending the receipt of comments from the FDEP. At the request of the FDEP, this IRAP was prepared in accordance with the requirements of a RAP as specified in Chapter 62-780.700, F.A.C. The primary difference between this IRAP and the Final RAP to be prepared for the Site is that this IRAP is limited in geographic scope to the Site and immediately surrounding areas. The Final RAP will address the entire area encompassed by the COC plume, including off-site soil. A RAP Summary Form for this IRAP is included in Appendix A.

1.3 Design Process

The overall design process for Site remediation, including the performance of remedial pilot studies, was established through FDEP approval of the Remedial Action Work Plan (RAWP) submitted in July 2005 by TetraTech, Inc. (TetraTech). The RAWP was developed to address both on-site and off-site contamination found at the Site, and it described pre-design activities necessary to support a comprehensive remedial design for both on- and off-site areas in the Final RAP. The pre-design activities included performing:

- Aquifer pumping tests in the upper and lower surficial aquifer systems;
- A pilot test of an ultraviolet oxidation (UVOx) advanced oxidation process (AOP) for destruction of COCs in groundwater;
- A bench-scale test of another AOP technology for destruction of COCs in groundwater; and
- A pilot test of bioremediation technologies for destruction of COCs in groundwater.

The first three pre-design activities listed above were completed by TetraTech, and the data are summarized herein. The bioremediation pilot testing has not yet been completed, but may be implemented in the future, if necessary.

2. Site Assessment Summary and Conceptual Site Model

This section summarizes the results of site assessment activities completed at the former ABC Site and provides a Conceptual Site Model (CSM). The purpose of this section is to summarize the Site-specific data and knowledge relied on to arrive at the basis of design (BOD) presented in Section 3. As such, this section focuses on data collected at the Site and in areas immediately surrounding the Site since this IRAP is focused on the Site source area. A comprehensive discussion of site assessment data collected at both on- and off-site areas will be provided in the Final RAP.

A description of the Site location, setting, geology, and hydrogeology is provided below followed by a discussion of additional site assessment activities completed since submittal of the SARA 2, and an evaluation of the potential for non-aqueous phase liquids (NAPLs) to exist in the subsurface at the site, with implications for implementation of the IRAP. The Site assessment summary also includes discussions of rationale for technology selection.

2.1 Site Location and Setting

The Site is located at 1600 Tallevast Road in Tallevast, Manatee County, Florida (Figure 1). As shown, the Site is located on a gently sloping plain at an elevation of approximately 30 feet above mean sea level (AMSL). The Site is approximately 1.5 miles east of Sarasota Bay and approximately 5.75 miles from the Gulf of Mexico. The ground surface immediately surrounding the Site has very low relief and slopes gently in a radial pattern. The ground surface elevation decreases from approximately 30 feet AMSL at the Site to 25 feet AMSL to the west near the intersection of Tallevast Road and 15th Street East. Further west, surface elevations decrease to approximately 15 feet AMSL just north of the Sarasota-Bradenton Airport. Several small surface water bodies are depicted on the Bradenton 7 ½ minute quadrangle within a one half mile radius of the site (Figure 1).

The Site encompasses approximately five acres and is bounded by Tallevast Road to the north; 17th Street Court East to the east; a golf course, undeveloped, and residential areas to the south; and an abandoned industrial facility to the west (Figure 2). Five primary buildings designated as Buildings 1 through 5, covering a total surface area of approximately 66,335 square feet, are located in the central portion of the property. Surface cover consists of: a landscaped storm water retention pond surrounded by grass on the west side of the Site; asphalt-paved parking areas south of the retention pond and south and east of the buildings; and a grass area in the southwestern portion of the Site adjoining the asphalt surface. A concrete swale is located in the driveway between the main buildings (Buildings 1 and 2) to the west and Buildings 3, 4, and 5 to the east. The swale is a pathway for storm water and slopes to a grass area at the southern end of the paved parking area. The pond located on the west side of the property was reportedly constructed in approximately 1960 and supports various wildlife, including fish and birds. During periods of heavy rainfall, this pond may serve as a groundwater recharge area.

2.2 Geology and Hydrogeology

2.2.1 Geology

In January 1995, the Southwest Florida Water Management District (SWFWMD) published a report entitled "ROMP TR-7 Oneco Monitor Well Site, Manatee County, Florida," describing drilling and testing of a well completed to a depth of 1,715 feet below ground surface (bgs) at a site located approximately 2 ½ miles north of the former ABC Site in southwestern Manatee County. Information presented in the following discussion was derived, in large part, from data provided in the SWFWMD report.

From the surface downward, sediments underlying southern Manatee County consist of:

- Undifferentiated surficial deposits (Pliocene to Recent);
- The Peace River Formation (PRF) and Arcadia Formation (AF) (undifferentiated) (Miocene);
- The Tampa Member of the AF and Suwannee Limestone (Oligocene); and
- A thick sequence of marine carbonates, including the Ocala Limestone and Avon Park Formation (Eocene).

The surficial deposits consist predominantly of quartz sand and are generally less than 40 feet thick in the region. They unconformably overlie deposits of the PRF, which, in the study area, consist of a clay layer known as the Venice Clay. The contact between the Venice Clay and the underlying undifferentiated AF was reported at a depth of 48 feet bgs by SWFWMD (1995). Undifferentiated Arcadia deposits consist predominantly of clayey calcilutites and phosphatic/quartz sand calcilutites and calcarenites with intercalated thin clay beds. These deposits extend to a depth of approximately 332 feet bgs (SWFWMD, 1995). The underlying Tampa Member of the AF consists primarily of quartz sandy limestone and dolomitic limestone, and is the uppermost unit of a thick sequence of marine carbonates comprising the Florida platform.

2.2.2 Hydrogeology

Three aquifer systems are present beneath the Site including, from top to bottom, the surficial aquifer system (SAS), the intermediate aquifer system (IAS), and the Floridian Aquifer System (FAS). These aquifer systems were described in detail in the SARA 1 and 2 (TetraTech, 2005) and other documents listed in the next subsection and Section 7. Since this IRAP specifically is focused on hydraulic containment of groundwater in the SAS, the remainder of this subsection discusses hydrogeology of the SAS. Readers are referred to other reports listed in Section 7 for thorough descriptions of the IAS and FAS. Groundwater remediation in the IAS and FAS, if necessary, will be addressed in the Final RAP.

The SAS is comprised of undifferentiated surficial deposits and has been subdivided into the USAS and LSAS. The USAS is present from ground surface to approximately 30 feet bgs. Groundwater in the USAS is first encountered approximately 3 to 5 feet bgs and, therefore, the saturated thickness of the USAS is approximately 25 feet. Groundwater in the USAS is under unconfined conditions and the USAS is water table aquifer. The most recent groundwater levels measured at USAS monitoring wells in May 2005 were contoured on a site map (Figure 3). As shown on Figure 3, the water-table contours suggest that the regional hydraulic gradient direction in the USAS is primarily toward the north with localized radial groundwater flow patterns away from the Site toward the northwest, north, and northeast.

The USAS and LSAS are separated by a thin (one- to two-foot thick), partially cemented layer known as the "hard streak" that appears to serve as a confining layer. A hydraulic head difference of approximately 5 to 7 feet has been measured across the hard streak with a downward component of hydraulic gradient exists between the USAS and LSAS.

The LSAS is approximately 35 to 45 feet bgs; however, groundwater levels in LSAS monitoring wells rise to within approximately 5 to 10 feet bgs indicating the presence of artesian conditions in the LSAS at the Site. Based on the presence of the hard streak and artesian conditions in the LSAS, the LSAS is considered to be a confined aquifer. The most recent groundwater levels measured at LSAS monitoring wells in May 2005 were contoured on a site map (Figure 4). As shown on Figure 4, groundwater elevations for the LSAS suggest that the regional hydraulic gradient direction in the LSAS is primarily toward the North.

The LSAS is underlain by the Venice Clay, which is approximately 30 to 40 feet thick at the Site and surrounding areas. The Venice Clay is considered to be confining with respect to vertical groundwater flow between the LSAS and the IAS due to its fine-grained nature and thickness. It is unlikely that Site-related COCs have migrated through the Venice Clay under natural groundwater flow conditions. Rather, the hydrogeologic information for the Site indicates that Site-related COCs probably entered the IAS via vertical downward migration along the casings of unpermitted water supply wells in the area near the Site. From a groundwater remediation standpoint, it is necessary to properly abandon and seal water supply wells in the area near the Site.

Published transmissivity values for the SAS in south-central Manatee County have been estimated at approximately 1,000 to 2,000 square feet per day (ft²/day), although in western and coastal Manatee County, published transmissivity values were as high as 7,000 ft²/day, which is a function of the coarser nature of the sand interbedded with shelly limestones and shell fragments (S WFWMD, 1995). Based on this information, and assuming the total thickness of the SAS is approximately 40 feet, this would equate to hydraulic conductivity values for the SAS ranging from approximately 25 to 175 feet per day (ft/day).

2.3 Previous Site Assessment Activities and Interim Remedial Actions

Site assessment activities and IRAs have occurred at the Site since February 1997. These activities are described in detail in the various reports listed in Section 7, and are summarized in the following table.

Activity	Timeframe	Results/Outcome
Lockheed Martin acquired the Site from Loral Corp.	November 1996	--
Phase I Environmental Site Assessment	February 1997	21 potential sources of COCs were identified at the former ABC Site.
Preliminary Site Investigation	August 1997 – January 2000	Beryllium, arsenic, and total petroleum hydrocarbons (TPH) concentrations in on-site soil samples were reported above criteria.
Soil excavation/sump removal	January 2000	Building 5 sumps and soil were removed to limit direct contact.
Phase I Environmental Site Assessment	December 1999 – January 2000	--

Activity	Timeframe	Results/Outcome
Contamination Discovery Report	July 2000	Tetrachloroethene (PCE), Trichloroethene (TCE), 1,1-Dichloroethene (DCE), beryllium, and chromium concentrations in on-site groundwater samples were reported above criteria.
Contamination Assessment Report (CAR)	April 2001	14 monitoring wells installed and sampled. Extent of beryllium and chromium in groundwater was limited to the area near the former sumps. Volatile organic compounds (VOCs) including PCE, TCE, DCE, 1,1-Dichloroethane (DCA), and vinyl chloride in on-site groundwater samples were reported above criteria.
Source Removal Action	September 2001	538 tons of soil removed near the Building 5 sump areas.
Supplemental Groundwater Assessment	December 2001 – January 2002	Additional temporary on- and off-site monitoring wells installed and sampled. Results presented in Interim Data Report.
Interim Data Report	September 2002	Further assessment required to delineate off-site groundwater COC plume.
Delineation Investigation	December 2002 – March 2003	Additional off-site monitoring wells installed and sampled. Results presented in Final CAR.
Final CAR	May 2003	Additional groundwater sampling and site assessment activities. Further assessment required to delineate off-site groundwater COC plume.
Post-CAR Monitoring	September 2003 – March 2004	Additional groundwater sampling of SAS monitoring wells both on- and off-site.
Residential Well Sampling and Geophysical Logging	May 2004 – July 2004	Groundwater samples collected at 29 private wells. Geophysical logging performed at 22 private wells. 17 of 29 wells had COCs above criteria. Many private wells were constructed with "open hole conditions" from 26 to 233 feet bgs. The well casings were in poor and deteriorated condition. Some wells were being fully or partially recharged through corrosion holes in well casings. The wells were constructed without bentonite or sanitary seals.
FDEP Site Investigation Section (SIS) Report	July 2004	Geophysical logging, groundwater sampling, and soil sampling. Downward hydraulic gradient from SAS to IAS.
Site Assessment Report	January 2005	Additional assessment activities required to delineate off-site groundwater COC plume.
Site Assessment Report Addendum 1 (SARA 1)	April 2005	Additional assessment activities required to delineate off-site groundwater COC plume.
Site Assessment Report Addendum 2 (SARA 2)	August 2005	Additional assessment activities required to delineate off-site groundwater COC plume. See below for additional details.

The SARA 2 summarized additional site assessment data collected between approximately April and August 2005, and includes much of the data relied upon to develop this IRAP. Additional site assessment data used to develop this IRAP, which have been collected since the completion of SARA 2, are described below. As noted, this IRAP is focused at the source area of the Site and therefore only includes data collected on the Site and areas immediately surrounding the Site. The reader is referred to the SARA 2 and other reports listed in Section 7 to access all of the Site data collected to date, including data collected at off-site locations that are beyond the scope of this IRAP. Furthermore, a SARA 3 report will be submitted to FDEP that includes all site assessment data for both on-site and off-site locations.

Results and conclusions of the SARA 2 are summarized below:

- Site-specific COCs in groundwater identified in the Consent Order include PCE, TCE, DCE, DCA, and Cis-1,2-DCE. Subsequent to issuance of the Consent Order, 1,4-Dioxane has been added as a site-specific COC in groundwater.
- Concentrations of one or more COCs were found to be above groundwater cleanup target levels (GCTLs) in the USAS and LSAS.
- The potential current and future exposure to contaminated groundwater is limited due to the use of the public water supply by the residents living in the vicinity of the groundwater plume.
- Private wells that previously provided water are no longer in use. Public water service has been extended to all private well users within the groundwater plume area.
- Groundwater in the upper 10 feet of the saturated zone (i.e., USAS) contains very low concentrations of COCs; however, groundwater deeper than 10 feet in the USAS was found to contain elevated COC concentrations.

Based on the site assessment data collected through August 2005, the SARA 2 recommended that a RAP be prepared for the Site to address COC exceedances in the USAS, LSAS, and IAS. Since additional site assessment activities are required to fully delineate the off-site extent of the groundwater COC plume, Lockheed Martin intends to implement this IRAP at the Site source area and to address the full extent of the off-site plume in the Final RAP after the SARA 3 has been submitted and approved by the FDEP.

2.4 Nature and Extent of COCs in Groundwater

As discussed above, this IRAP is focused on hydraulic containment of the source area at the former ABC Site. This section summarizes the nature and extent of COCs in groundwater in the USAS and LSAS at the Site and its immediately surrounding areas. The nature and extent of COCs in the deeper aquifers (i.e., the IAS and FAS) and at off-site areas are still being delineated by means of additional site assessment activities, and will be addressed in the SARA 3 and Final RAP, which are being submitted separately.

The most recent groundwater analytical results for USAS and LSAS monitoring wells at the Site were collected in June and July 2005 and are shown on Figures 5 and 6, respectively, and summarized below. As shown, COCs were detected in SAS groundwater at the Site as follows:

COC	USAS Samples (Summer 2005)		LSAS Samples (Summer 2005)	
	Concentrations (µg/L)	Location of Highest Concentration	Concentrations (µg/L)	Location of Highest Concentration
PCE	ND (<0.5) – 347	MW-38	ND (<0.5) – 63	MW-87
TCE	ND (<0.5) – 3,160	MW-42	ND (<0.5) – 2,310	MW-37
Cis-1,2-DCE	ND (<0.5) – 133	MW-42	ND (<0.5) – 420	MW-79
1,1-DCE	ND (<0.5) – 253	MW-38	ND (<0.5) – 485	MW-80
1,1-DCA	ND (<0.5) – 123	MW-38	ND (<0.5) – 382	MW-78
1,4-Dioxane	ND (<2) – 46	MW-42	ND (<2) – 418	MW-33

Note: ND = non detect at the detection limit indicated in parentheses.

As shown on Figure 5 and in the above table, the highest COC concentrations in USAS groundwater during summer 2005 were detected in samples collected at monitoring wells MW-38 and MW-42. These wells are located southeast of Building 5, which is consistent with the location of the former sumps and is considered to be indicative of the source area targeted in this IRAP.

As shown on Figure 6 and in the above table, the highest TCE concentration in LSAS groundwater during summer 2005 was detected in a sample collected at monitoring well MW-37. This well is also located near the former sumps associated with the southeast corner of Building 5.

The highest concentrations of other COCs in LSAS groundwater during summer 2005 were found in samples collected at various monitoring wells both on- and off-site, and did not appear to be correlated with the source area near the southeast corner of Building 5. For example, the highest PCE concentration in LSAS groundwater during summer 2005 was detected in a sample collected at monitoring well MW-87 located on the adjacent golf course. The highest cis-1,2-DCE concentration in LSAS groundwater during summer 2005 was detected in a sample collected at monitoring well MW-79 which is located east-northeast of the Site adjacent to the Seminole-Gulf Railway. The highest 1,1-DCE concentration in LSAS groundwater during summer 2005 was detected in a sample collected at monitoring well MW-80 which is located adjacent to the Site storm water retention pond. The highest 1,1-DCA concentration in LSAS groundwater during summer 2005 was detected in a sample collected at monitoring well MW-78 which is located off-Site to the south. The highest 1,4-dioxane concentration in LSAS groundwater during the summer 2005 was detected in a sample collected at monitoring well MW-33 which is located in the southern portion of the Site.

2.5 Additional Data Collected Since SARA 2

Pre-design data have been collected since August 2005 during the performance of pumping tests and the completion of remedial pilot studies. Results of these studies were used to prepare this IRAP, refine the BOD, and design the groundwater PAT system. These studies are described below.

In accordance with the RAWP, TetraTech conducted two pumping tests at the Site in September 2005. The first was a 48-hour pumping test in the USAS and the second was a 24-hour pumping test in the LSAS. The purpose of the pumping tests was to collect Site-specific pre-design hydrogeological data to support the preparation of the Final RAP for the area. The potential for PAT (i.e., groundwater extraction) to remove contaminant mass from the affected aquifer zones within the SAS, and to contain and mitigate plume migration was evaluated. Data collected during the pumping tests was used to support the BOD presented in Section 3 of this IRAP. Specifically, pumping test data were used to:

-
- Design the groundwater extraction wells and estimate groundwater extraction rates for the USAS and LSAS (Section 3.1.1);
 - Provide a preliminary estimate of the extent of the capture zones in the USAS and LSAS that may be created during operation of this IRAP (Section 3.1.2); and
 - Provide a basis for designing the water treatment system (Section 3.1.3).

During each pumping test, extracted groundwater was collected into a 6,000 gallon tank. Prior to treatment of groundwater within the on-site UVOx pilot system, periodic samples were collected and analyzed for COCs. Additionally, samples of the treated discharge from the UVOx unit were collected during its operational period and analyzed for COCs. A sample of extracted water was also sent off-site for a bench-scale test using an AOP.

The groundwater quality results, pumping test data, and associated design analyses are provided in Appendix B.

2.6 NAPL Evaluation

This section presents an evaluation of the potential for NAPL to be present in the subsurface at and near the Site. This is important because if subsurface NAPL enters the proposed groundwater PAT system it could potentially hinder the effectiveness of the pumping and treatment equipment. Therefore, an evaluation of the potential for NAPL is warranted.

Results indicate that even though NAPL has never been directly observed in any soil or groundwater samples collected during Site assessment or pre-design activities, NAPL potentially exists within a limited portion of the USAS near the source area associated with the southeast corner of Building 5. This conclusion is based on groundwater samples collected during site assessment and pre-design activities. The data suggest that if NAPL is present in the USAS near the source area, then it probably exists as small, disconnected ganglia that are no longer mobile under natural hydraulic gradients and will probably not enter the PAT system. Nonetheless, the IRAP includes provisions to monitor the groundwater PAT system for the presence of NAPL.

This NAPL evaluation considered two types of site assessment (or pre-design) data:

1. Observations of NAPL or sheens in soil and groundwater samples collected during site assessment activities or the absence thereof; and
2. Groundwater samples with concentrations of COCs in excess of 1% of associated solubility limits.

To supplement the first data type, TetraTech used a specialized NAPL-detection technology called the Flute™ method during completion of SARA 1 field activities. The Flute™ method involves the use of a proprietary Flute™ Liner that is placed in contact with soil in-situ during drilling. A NAPL-sensitive dye on the Flute™ Liner will visibly change color if NAPLs come in contact with the dye thereby indicating the presence of NAPL. As reported in the SARA 1, no NAPL was visually observed or detected by the Flute™ test during SARA 1 field activities.

Based on the first data type, NAPL has never been directly observed in any soil or groundwater samples collected during Site assessment activities. Therefore, there is no direct evidence that NAPL exists in the subsurface.

Using the second data type, there is some potential for NAPL to exist in a limited area within the USAS. The following table provides COC solubility limits and summarizes the highest COC concentrations detected in groundwater samples collected at and near the Site during the completion of SARA 2 and pre-design field activities:

COC	Solubility Limit ¹ (mg/L)	1% of Solubility ² (mg/L)	Highest Concentrations Detected in Site Samples (mg/L)	Result
PCE	150	1.5	0.35 (MW-38, USAS, June/July 2005) 0.06 (MW-87, LSAS, June/July 2005)	NAPL probably not present
TCE	1,100	11	11 (USAS Pumping test, Sept 2005) 2.3 (MW-37, LSAS, June/July 2005)	NAPL potentially present
Cis-1,2-DCE	3,500	3.5	0.13 (MW-42, USAS, June/July 2005) 0.42 (MW-79, LSAS, June/July 2005)	NAPL probably not present
1,1-DCE	250	2.5	0.25 (MW-38, USAS, June/July 2005) 0.49 (MW-80, LSAS, June/July 2005)	NAPL probably not present
1,1-DCA	5,060	5.1	0.12 (MW-38, USAS, June/July 2005) 0.38 (MW-78, LSAS, June/July 2005)	NAPL probably not present
1,4-Dioxane	Miscible	Not Applicable	0.05 (MW-42, USAS, June/July 2005) 0.99 (LSAS pumping test, Sept 2005)	Inconclusive

Notes: ¹ Howard, 1991. ² USEPA suggests that NAPL may be present if the chemical concentration exceeds 1% of its solubility (USEPA, 1992). mg/L = milligrams per liter.

As indicated in the table above, samples of un-treated USAS groundwater collected during the pumping test were found to contain TCE at concentrations that are approximately 1% of TCE's solubility limit. Additionally, some discrete-interval groundwater samples collected from the USAS in the source area during completion of SARA 1 field activities (TetraTech, 2005) and one groundwater sample collected from a USAS monitoring well in the source area during completion of the Preliminary Contamination Assessment Report (FDEP, 2004) also were found to contain some COCs at concentrations approaching or exceeding 1 % of their solubility limits. None of the groundwater samples collected from the LSAS have been found to contain COCs at concentrations exceeding 1 % of their solubility limits. Based on this information, it is concluded that NAPL is potentially present in the USAS within a limited area near the southeast corner of Building 5.

2.7 Rationale for Technology Selection

2.7.1 Evaluation of Remedial Alternatives

This section presents the evaluation of remedial technologies for the Interim Remedial Action (IRA) at the Site. This evaluation was also included in TetraTech's July 2005 RAWP. The technologies considered effective for the treatment of COCs present at the Site were considered further for the bench/pilot scale studies, as detailed in Section 2.7.2.

2.7.1.1 Air Stripping

Air stripping involves the mass transfer of VOCs from water to air. This process is typically conducted in packed towers or using lower-profile perforated trays. These units include a spray nozzle at the top, a fan to force air countercurrent to the water flow, and a sump at the bottom to collect treated water. Auxiliary equipment that can be added to the basic air stripper include a feed water heater and an air heater to improve removal efficiencies; automated control systems with sump level switches and safety features such as differential pressure monitors, high sump level switches and explosion proof components; and discharge air treatment systems such as activated carbon units, catalytic oxidizers, or thermal oxidizers. Air strippers are installed either as permanent installations on concrete pads, as temporary installations on skids, or on trailers.

The air stripping technology is effective for treating VOCs in groundwater; however, air stripping does not remove 1,4-dioxane from groundwater and there would be an air emission. Therefore, this technology was not evaluated further.

2.7.1.2 Liquid Phase Carbon Adsorption

Liquid-phase carbon adsorption is a technology in which groundwater is pumped through a series of vessels containing activated carbon to which dissolved organic compounds adsorb. When the concentration of compounds in the effluent from the bed exceeds a certain level, the carbon can be regenerated in place, removed and regenerated at an off-site facility, or removed and taken off-site for disposal. Adsorption by activated carbon has a long history of use in treating municipal, industrial, and hazardous wastes.

The liquid-phase carbon adsorption is effective for the treatment of highly substituted organic compounds with low aqueous solubility, including TCE and PCE. However, as the solubility of the organic compounds increases, carbon adsorbability decreases. The liquid-phase carbon adsorption will be used as a polishing step to a primary treatment technology (advanced oxidation) in the IRA.

2.7.1.3 In-Situ Reductive Dechlorination

In-situ reductive dechlorination (abiotic and biotic processes) of chlorinated aliphatic compounds can occur by several abiotic and biotic reductive pathways. Hydrogenolysis or reductive dehalogenation is the primary pathway where complete dechlorination occurs in a sequential manner where a hydrogen ion replaces a chloride ion and daughter products are formed. A second primary pathway is called reductive β -elimination process where chlorinated compounds form degradation products in the acetylene group. Other less significant pathways include degradation via hydrogenation and dehydrohalogenation.

Nanoscale Fe (0) particles (both with and without a noble metal catalyst) have been shown to effectively treat groundwater contaminated with numerous chlorinated VOCs under saturated conditions in both laboratory and field-based studies. Nanoscale iron particles are defined as Fe (0) particles that are within 50 to 300 nanometers (nm or 10^{-9} meter) in diameter. Smaller in diameter than colloids or bacteria, these particles are approximately the same size as viruses or large molecules. These laboratory-synthesized particles may or may not contain a trace coating of noble metal catalyst [generally palladium (Pd), platinum (Pt) or other metal]. With one of these catalysts, the particles are commonly referred to as bimetallic nanoparticles. Nanoscale particles provide a versatile remediation tool due to their extremely small particle size, which allows an iron-water suspension to be readily injected into the subsurface where contaminants are present. It has been shown that some particles flow with groundwater and remain in suspension for extended periods of time, while others are filtered out and adhere to the soil matrix to establish an in-situ treatment zone favorable for source remediation and emanating plumes. A substantial body of research on the Fe (0) abiotic destruction of chlorinated alkenes suggests that the reactions are surface-mediated. The high reactivity of the particles is directly related to their extremely high specific surface area. A benefit of Fe (0) is that the generation of strong reducing conditions and hydrogen gas foster anaerobic microbial growth and increase natural biological degradation in the field.

Pilot and full-scale demonstrations have revealed that the addition of biodegradable organic substrates can also stimulate the anaerobic biodegradation of VOCs in contaminated aquifers. The addition of soluble and slow release organic substrates to groundwater can accelerate the natural anaerobic biodegradation of the chlorinated hydrocarbons. Several vendors have developed edible oil (e.g., vegetable oil or soybean oil) products for injection into groundwater. Since the injected substrate is an oil, its biodegradation rate is limited by its slow dissolution into groundwater. In addition to their slow release properties, edible oils contain more energy per mass and sustain biodegradation reactions. Other electron donors that can be injected into the aquifer for anaerobic biodegradation of VOCs include lactate and molasses.

Numerous studies have shown that reductive dechlorination of PCE or TCE stalls with the production of cis-1,2-DCE in the absence of certain microbes (i.e., *Dehalococcoides ethenogenes*). In these cases, bioremediation of chlorinated VOCs may be enhanced by the addition of microbes in the groundwater to complete the reductive dechlorination pathway.

While in-situ reductive dechlorination may be part of the Final Remedy for the site, it will not be included as part of the IRA. Due to the need to effect groundwater cleanup as quickly as possible at the Site, in-situ reductive dechlorination was not selected for use during the IRA.

2.7.1.4 Enhanced Bioremediation

Although the available data indicate that 1,4-dioxane is not appreciably removed in conventional biological treatment systems, recent research suggests that high 1,4-dioxane removal efficiencies can be achieved in modified biological processes. The biodegradation of 1,4-dioxane was investigated by electrolytic respirometry using activated sludge with prior exposure to 1,4-dioxane to seed the reactor. After an adaptation period of 32 days, 150 mg/L of 1,4-dioxane was biodegraded to below detection. However, at higher initial concentrations, biodegradation was incomplete suggesting inhibition from byproducts.

In another study, a continuous flow attached-growth reactor was used to develop a mixed culture that could biodegrade 1,4-dioxane as the sole carbon and energy source. It was determined that the micro-organisms responsible for 1,4-dioxane biodegradation belonged to the genus *Rhodococcus*. The culture was enriched for approximately 6 months and had a maximum specific growth rate of 0.103 day^{-1} and a half-saturation constant

of 180 mg/L as chemical oxygen demand. The 1,4-dioxane biodegradation rate was highly dependent on temperature, with the optimum growth rate occurring at 35 degrees Celsius (°C). In subsequent work, a fluidized bed reactor consistently treated an influent stream containing 100 mg/L of 1,4-dioxane to below 1 mg/L. Due to the slow growth rates, long residence times were required to achieve satisfactory removal. It was also found that the culture developed required high temperature (35 °C), long residence times, and high initial 1,4-dioxane concentrations to achieve significant removal.

Aerobic cometabolism is a promising technology for the in-situ remediation of chlorinated aliphatic hydrocarbons and 1,4-dioxane. This task is complicated by the complexity of the cometabolic process and the different cometabolic substrates (propane, butane, etc.) from which to choose. The target compounds and their concentrations are also important considerations, along with the transformation abilities of the indigenous microorganisms that are stimulated on a specific substrate.

While enhanced bioremediation may be part of the Final Remedy for the site, it will not be included as part of the IRA. Due to the need to effect groundwater cleanup as quickly as possible at the Site, enhanced bioremediation was not selected for use during the IRA.

2.7.1.5 Advanced Oxidation

Advanced Oxidation or AOP uses the hydroxyl radical as an oxidant and can achieve substantial reductions in 1,4-dioxane and VOCs. Ultraviolet (UV) light is also commonly used as an AOP. However, 1,4-dioxane is a relatively weak absorber of UV light and, thus, poorly degraded by direct photolysis. UV light can be used in combination with peroxide (H_2O_2) and/or ozone (O_3), however, to produce hydroxyl radicals that react with 1,4-dioxane. It has been determined that the degradation kinetics of 1,4-dioxane exposed to UV/ H_2O_2 treatment followed first-order kinetics and achieved a 90% reduction in 1,4-dioxane in 5 minutes. The pH of the solution decreased from 5 to 3 during treatment due to the formation of organic acids.

In related work, it was found that sodium peroxydisulfate combined with UV light was more effective in degrading 1,4-dioxane than UV light with H_2O_2 . 1,4-Dioxane was observed to degrade faster at higher pH values. UV, in combination with a titanium dioxide (TiO_2) catalyst, has also been demonstrated to degrade 1,4-dioxane. A 99% reduction in 1,4-dioxane was achieved using wavelengths greater than 300 nm.

Hydrogen peroxide can also be used in combination with ferrous ion (Fenton's reagent) to degrade 1,4-dioxane. A 97% reduction in 1,4-dioxane was observed in the experiments after 10 hours of incubation in Fenton's reagent with a 12:1 ratio of H_2O_2 to 1,4-dioxane.

There are several different AOPs that are commercially available for the treatment of 1,4-dioxane and VOCs that use combinations of H_2O_2 , O_3 , and UV light. Two AOPs for the treatment of 1,4-dioxane and chlorinated VOCs were further evaluated during pilot testing. These are discussed further in Section 2.7.2.

2.7.1.6 Monitored Natural Attenuation

Natural attenuation allows for biological processes and physical processes, such as dispersion, sorption, and dilution, to reduce chemical concentrations. Chlorinated compounds can be biologically degraded by anaerobic microorganisms. However, this process requires a carbon source. Often, naturally-occurring carbon is present in sufficient quantities to sustain the biological activity. In many cases, a coincidental fuel release contributes the carbon.

These natural processes may take many years. Groundwater modeling is often performed to estimate the time to reach cleanup goals throughout the plume. When natural attenuation is used as a remedial approach, long-term monitoring is required to track the changes in plume concentrations and to evaluate changes in geochemical conditions.

Off-site COC concentrations are all relatively low and the existing natural attenuation data suggests that biological reduction is occurring. Therefore, monitored natural attenuation may be a viable remedial alternative for off-site portions of the plume, and will be considered in the Final RAP. Typically, a monitored natural attenuation approach is used in conjunction with another source treatment technology such as PAT. Thus, monitored natural attenuation will not be included as part of the IRA but will be carefully considered in the Final RAP for off-site control.

2.7.2 Pilot Study Results

This section discusses the bench scale/pilot testing of treatment technologies selected in Section 2.7.1 for further evaluation for the treatment of site COCs. The bench scale/pilot test for the COCs in each aquifer zone are discussed below. To ensure security of the pilot test equipment and limit, to the extent practicable, potential impact to the surrounding community, the pilot tests were conducted within the boundaries of the former ABC Site. The property is completely fenced with locked gates so access to the pilot test locations was controlled.

The following two tests were conducted to determine the most efficient and cost-effective AOP technology for the treatment of contaminants present at the Site:

- Field pilot test conducted by Purifics ES, Inc. (Purifics); and
- Bench scale test conducted by Applied Process Technology, Inc. (APT).

These tests are described in the following subsections.

2.7.2.1 UVOx Pilot Test (Purifics)

To aid in the process design, a pilot test utilizing the UVOx treatment process was conducted on-site. The pilot test verified the effectiveness of the UVOx treatment process in treating 1,4-dioxane and VOCs in groundwater at the former ABC Site.

A mobile pilot test unit that utilizes UVOx treatment technology with a patented closed-loop TiO₂ slurry-based photocatalytic process was used for the pilot testing using site groundwater. The pilot test unit is a smaller scale version of the Photo-Cat system manufactured by Purifics.

Other organic and inorganic constituents in site groundwater were investigated as to assess whether they interfere with the UVOx process, reduce the treatment efficiency, or even prohibit its use. If these deteriorating conditions existed, modifications to the treatment process, such as adding pre- and/or post-treatment, would be considered. The pilot test provided baseline design and operating parameters for a full-scale treatment system.

To safeguard the environment, the mobile pilot test unit was equipped with influent/effluent storage tanks, a pre-treatment filtration unit, and a post-treatment carbon adsorption unit. The pilot treatment unit operated at

various flow rates ranging from 2.6 to 5.0 gpm. Influent, effluent, and intermediate samples were collected at critical points of the pilot test system and analyzed throughout the pilot test period to verify the input and output conditions.

Adjustments of the pilot test unit, such as residence time, dosage, etc., were conducted by Purifics to optimize its performance. Design information and operating data were collected. A test report prepared by Purifics and an analytical data report from KB Labs, Inc. are presented in Appendix C.

2.7.2.2 Advanced Oxidation Process Bench Scale Test (APT)

APT's HiPOx™ technology is a continuous, in-line, at-pressure AOP for the destruction of waterborne VOCs and 1,4-dioxane. The process uses O₃ and H₂O₂ chemistry in a uniquely designed oxidation reactor. The reactants are injected directly into the water stream in precisely controlled ratios and locations, generating hydroxyl radicals, which are powerful oxidizers. These hydroxyl radicals attack the bonds in the organic molecules, progressively oxidizing these compounds and any resulting intermediate by-products until the basic atoms ultimately recombine into benign end-products of carbon dioxide (CO₂), water (H₂O), and salts.

This application is best served by a HiPOx Cabinet Unit (HCU) configured with an O₃ generator. The HCU includes a H₂O₂ storage and delivery system, oxygen delivery system, O₃ generation and delivery system, integrated control system, and process cooling system. The reactor skid included plug-flow reactors, O₃ and H₂O₂ injectors, and gas/liquid separation system.

To confirm efficacy and to design a full scale system for a particular application, a bench scale reactor was used to validate HiPOx performance. Approximately 2.5 gallons of representative groundwater were collected and shipped to the APT facility in California. Typically, two or three runs of a given sample were made at differing O₃ and H₂O₂ dosages. During the tests, analytical samples were drawn from the raw sample and at the end of each run. This method generated several destruction points that, when taken together, defined the HiPOx system's destruction characteristics. This data was used to model the design and performance of the full scale system. A test report prepared by APT, including analytical data from Accutest Laboratories, is presented in Appendix C.

2.7.3 Selected Remedial Alternative

Groundwater PAT utilizing an advanced oxidation water treatment process has been selected as the remedial approach for the IRA. This is based on site conditions, the CSM, the evaluation of remedial alternatives, and applicable bench-scale and pilot study testing as presented herein. Table 1 presents a summary of the required evaluation criteria for the selected remedial alternative as specified in Chapter 62-780.700(3)(d)(2) items a through g, F.A.C.

3. Basis of Design

This BOD describes the selected remedial alternative for the IRAP, which consists of a PAT system. The BOD was based on Site assessment data presented in SARA 2, other reports listed in Section 7, and pre-design data collected during remedial pilot studies. The BOD also includes discussions of target cleanup levels, disposition of treated effluent, performance objectives, and cessation criteria. This BOD is based on the conceptual BOD submitted to FDEP in December 2005 (BBL, 2005).

3.1 Description of the IRAP

The layout of the proposed IRA system is shown on Figure 7. A conceptual hydrogeologic cross section of the proposed IRA is shown on Figure 8. As shown, a total of eight groundwater extraction wells will be installed around the Site source area including four extraction wells in the USAS and four in the LSAS. Extracted groundwater will be conveyed to the treatment compound via underground piping. Treated water will be transferred to the POTW via underground piping.

3.1.1 Extraction Well Design

The locations of proposed extraction wells are shown on Figure 7. The rationale for these locations is as follows:

- **Proposed Extraction Location A:** This extraction well pair will provide hydraulic containment at the source area, remove COC mass from the USAS and LSAS, and limit the potential for groundwater with high COC concentrations to migrate off-site toward the north and northeast. These wells will be installed initially and tested during startup of the treatment system.
- **Proposed Extraction Location B:** This extraction well pair will provide hydraulic containment at the source area, remove COC mass from the USAS and LSAS, and limit the potential for groundwater with high COC concentrations to migrate off-site. These extraction wells will also be installed initially and tested during startup of the treatment system.
- **Proposed Extraction Location C:** This extraction well pair will provide hydraulic containment at the source area, remove COC mass from the USAS and LSAS, and limit the potential for groundwater with high COC concentrations to migrate off-site toward the east and southeast. These extraction wells will be installed after startup and testing of the treatment system. Extraction well locations are subject to change pending results obtained during startup and testing. For example, it may be beneficial to move one or both proposed extraction wells to the South in an effort to increase the capture zone in that direction.
- **Proposed Extraction Location D:** This extraction well pair will provide hydraulic containment at the source area, remove COC mass from the USAS and LSAS, and limit the potential for groundwater with high COC concentrations to migrate off-site toward the north and northwest. Similar to the Location C extraction well pair, the Location D extraction wells will be installed after startup and testing of the treatment system, and locations are subject to change pending results obtained during startup and testing. For example, it may be beneficial to move one or both proposed extraction wells to the west in an effort to increase the capture zone in that direction.

The extraction wells will consist of 5-inch-diameter Schedule 40 (Sch. 40) polyvinyl chloride (PVC) well materials designed to screen the USAS or LSAS. The extraction wells will include a five-foot section of blank casing below the target screened interval to house the pumps, allow for maximum drawdown in the well, and provide a sump to monitor for dense NAPL in case mobile NAPL enters the extraction well. The screen slot size will be determined based on grain size characteristics of aquifer samples collected during drilling.

Extraction well design parameters for the USAS extraction wells are as follows:

Design Parameters for Proposed Extraction Wells in the USAS		
Design Parameter	Value	Basis/Comments
Number of extraction wells	4	Rationale provided above. Locations shown on Figure 7.
Total depth (ft bgs)	35	Approximate depth of USAS. May be adjusted in the field based on geologic conditions encountered during drilling. Includes 5-feet of blank casing below screened interval.
Screened interval (ft bgs)	5 – 30	Entire saturated thickness of aquifer. May be adjusted in the field based on geologic conditions encountered during drilling.
Well materials	Sch. 40 PVC	Based on durability, strength, and compatibility with USAS geochemistry.
Groundwater extraction rate (gpm per well)	3 - 5	USAS pumping test was performed at 3 gpm with approximately 20 feet of drawdown.
Total extraction rate (gpm – all USAS wells)	12 – 20	--
Well diameter (inches)	5	Appropriate for pump size.
Borehole diameter (feet)	2	Increase well efficiency relative to smaller borehole diameter.
Screen slot width	TBD*	Aquifer soil samples will be collected during drilling and analyzed for grain size distribution (GSD). Screen slot width will be determined after receipt of GSD data.
Filter material	TBD	Will be selected in conjunction with screen slot width.
Blank casing below well screen (feet)	5	Blank casing will be installed below the screened interval to allow for maximum drawdown in the well, and also to allow for monitoring/removal of NAPL, if present. The hardstreak interval will be sealed with grout.

* To be determined.

Extraction well design parameters for the LSAS extraction wells are as follows:

Design Parameters for Proposed Extraction Wells in the LSAS		
Design Parameter	Value	Basis/Comments
Number of extraction wells	4	Rationale provided above. Locations shown on Figure 7.
Total depth (ft bgs)	45	Depth of LSAS. May be adjusted in the field based on geologic conditions encountered during drilling. Includes 5-feet of blank casing below screened interval.
Screened interval (ft bgs)	35 – 40	Entire saturated thickness of aquifer.
Well materials	Sch. 40 PVC	Based on durability, strength, and compatibility with LSAS geochemistry.
Groundwater extraction rate (gpm per well)	5 – 10	LSAS pumping test was performed at 5 gpm with approximately 15 feet of drawdown.
Total extraction rate (gpm for all 4 wells)	20 – 40	--
Well diameter (inches)	5	Appropriate for pump size.
Borehole diameter (feet)	1	Increase well efficiency relative to smaller borehole diameter.
Screen slot width	TBD*	Aquifer soil samples will be collected during drilling and analyzed for GSD. Screen slot width will be determined after receipt of GSD data.
Filter material	TBD	Will be selected in conjunction with screen slot width.
Blank casing below well screen (feet)	5	Blank casing will be installed below the screened interval to allow for maximum drawdown in the well, and also to allow for monitoring/removal of NAPL, if present. The blank casing below the screen will be encased in grout.

* To be determined.

3.1.2 Capture Zone Analysis

A preliminary estimate of the extent of the hydraulic containment zones (also known as “capture zones”) associated with the operation of this IRAP is provided in Appendix B. As discussed in Appendix B, the estimate of the USAS capture zone was based on extrapolating aquifer pumping test data to 90 days for the USAS in which continued drawdown was observed during the later stages of the pumping test. No extrapolation of pumping test results was used in the analysis of the LSAS capture zone. Rather the LSAS capture zone analysis was based on the predicted capture zone created after approximately 1 day of pumping. It should be noted that these estimates were based on the best available information at the time this report was prepared, and that the actual shape of the capture zones under pumping conditions will likely change with time. Early-time capture zones (i.e., less than one day after pumping) will likely be somewhat smaller than estimated herein for the USAS, and late-time capture zones (i.e., more than three months after pumping) will likely be somewhat larger than estimated herein for both the USAS and LSAS.

As shown on Figure B-5 in Appendix B, the estimated extent of the capture zone within the USAS associated with this IRAP encompasses the source area at Building 5 (former sumps), the area of the USAS where NAPL

may potentially be present based on COC concentrations (see Section 2.6), and the area of the USAS containing the highest COC concentrations near monitoring wells MW-38 and MW-42. Furthermore, the pumping test data suggest that the capture zone within the USAS will extend off-site to the north, south and east of the Site to some extent.

As shown on Figure B-6 in Appendix B, the estimated extent of the capture zone within the LSAS associated with this IRAP encompasses the source area at Building 5 and the area with the highest TCE concentrations in the LSAS near monitoring well MW-37. As with the USAS, it is anticipated that the capture zone within the LSAS associated with this IRAP will extend off-site north, south and east.

The actual capture zones developed in the USAS and LSAS under pumping conditions will be monitored on a regular basis during operation of the IRAP using groundwater level measurements obtained during effectiveness monitoring.

3.1.3 Influent Concentrations

The influent concentrations are estimated from the analytical results of groundwater samples collected during summer 2005 and pumping tests conducted in September 2005 by TetraTech. Separate pumping tests were conducted in the USAS and LSAS. Based on these analytical results, the key treatment system design constituents were identified to be TCE and 1,4-dioxane. While additional VOCs were present at lower concentrations in the sampled groundwater, TCE and 1,4-dioxane were identified as the key constituents based on concentrations and required treatment process.

During the pumping tests, USAS data reported a maximum TCE concentration of 11 mg/L and a maximum 1,4-dioxane concentration of 0.3 mg/L. LSAS data reported a maximum TCE concentration of 1 mg/L and a maximum 1,4-dioxane concentration of 1 mg/L. However, to account for relatively low levels (0.2 mg/L or less) of other VOCs and that it is improbable that there will be a 50-50 blend of water from the upper and lower surficial aquifers, the anticipated influent concentrations of the key parameters are presented below.

Parameter	Unit	Concentration
TCE	mg/L	10
1,4-Dioxane	mg/L	0.75

These concentrations are greater than the highest COC concentrations in USAS and LSAS groundwater during summer 2005 (see Section 2.4).

Data reported by FDEP in the Preliminary Contamination Assessment Report dated July 2004 indicated the presence of dissolved phase TCE in source area groundwater at concentrations above 1% of solubility, suggesting the potential presence of residual non-aqueous phase liquid. However, no direct observations of NAPL have been reported and NAPL is not expected to be encountered during groundwater treatment activities.

3.1.4 Groundwater Extraction and Treatment System

The groundwater extraction and treatment system is described in this section. Design data, including calculations and equipment literature, is presented in Appendix D. The proposed IRA process flow diagram and treatment compound layout are shown on Figures 9 and 10, respectively.

3.1.4.1 Extraction Well Pumps

Groundwater with dissolved VOCs will be extracted from eight on-site extraction wells, including four screened in the US AS and four screened in the LS AS. Groundwater will be extracted from each well in the US AS using a Grundfos Model SS03-9-1/3 (1/3 horsepower [hp]) submersible pump. These pumps are designed to operate at a flowrate of approximately 5 gpm each. Groundwater will be extracted from each well in the LS AS using a Grundfos Model 10S03-6-1/3 (1/3 hp) submersible pump. These pumps are designed to pump a flowrate of approximately 10 gpm each. The total anticipated flowrate is up to 60 gpm.

Equipment

1. Submersible Well Pumps (US AS)

Manufacturer:	Grundfos, or equal
Model:	SS03-9-1/3
Type:	Submersible
Quantity:	4
Horsepower:	1/3
Flowrate:	5 gpm each

2. Submersible Well Pumps (LS AS)

Manufacturer:	Grundfos, or equal
Model:	10S03-6-1/3
Type:	Submersible
Quantity:	4
Horsepower:	1/3
Flowrate:	10 gpm each

3.1.4.2 Influent Tank

The extraction well pumps will pump to a baffled influent tank. The influent tank will not only provide storage capacity but it will also entrap NAPL in the unlikely event that it is encountered. The influent tank will be a baffled tank manufactured by Baker Tanks and have a storage capacity of 21,000 gallons. Transfer pump operation will be controlled from a level sensor in the influent tank. The tank will also be equipped with a high level alarm which will shut down the extraction well pumps upon activation and a low level alarm which will shut down the transfer pump to prevent it from running dry.

Equipment

1. Influent Tank

Manufacturer:	Baker Tanks, or equal
Model:	Frac Tank
Storage Capacity:	21,000 gallons
Materials of Construction:	Carbon Steel

3.1.4.3 Bag Filters

Following the influent tank, groundwater will be pumped through a bag filter skid for primary filtration. The bag filter skid will consist of two bag filter housings in parallel containing 25 micron bag filters, followed in series by two bag filter housings containing 10 micron bag filters. The bag filter skid will be a Carbonair Model 88 bag filter housing with differential pressure gauges to measure bag filter fouling.

Equipment

1. Bag Filters

Manufacturer:	Carbonair, or equal
Model:	88 Duplex
Surface Area:	8.8 cubic feet
Materials of Construction:	Carbon Steel

3.1.4.4 Advanced Oxidation

After primary filtration, the VOCs in the groundwater will be treated via an AOP. Based on performance during the field pilot test and other advantages discussed below, a Photo-Cat water treatment system manufactured by Purifics was selected. The VOCs in the groundwater are destroyed when the groundwater is mixed with a TiO₂ slurry and exposed to UV light in the reactor. This photocatalytic process purifies or detoxifies the groundwater resulting in benign end-products of CO₂, H₂O and salts. No daughter products of the COCs (e.g., vinyl chloride) are generated during this process.

The Photo-Cat is designed to operate continuously with minimal operator attention. The process is fully automated, sealed, and generates no waste stream, including air emissions. The Photo-Cat also contains a fully integrated programmable logic controller (PLC) based operating system. This operating system will control the entire treatment system controls and alarms.

Equipment

1. Advanced Oxidation

Manufacturer:	Purifics
Model:	Photo-Cat

3.1.4.5 Granular Activated Carbon Vessels

The treated groundwater will go through a granular activated carbon (GAC) vessel for tertiary treatment or polishing. The GAC vessel will be a Carbonair Model LPC 9 liquid-phase carbon adsorber with 1,500 pounds of virgin carbon. Following treatment, the groundwater will be discharged to the Manatee County POTW as discussed in Section 3.1.5.

Equipment

1. GAC Vessel

Manufacturer:	Carbonair, or equal
Model:	LPC 9
Carbon Capacity:	1,500 lbs
Carbon Type:	Virgin
Max. Pressure:	15 pounds per square inch (psi)

3.1.4.6 Treatment System Enclosure

The groundwater treatment system equipment will be housed in a fixed canopy structure. The canopy structure will provide protection against rain and sun, and will be approximately 35 feet long by 15 feet wide. The structure will be designed in accordance with applicable local and State of Florida building codes.

3.1.5 Disposition of Effluent

Recovered groundwater will be treated on-site via primary filtration, advanced oxidation, and carbon polishing. Following treatment, the groundwater will be discharged to the Manatee County POTW through an on-site connection to the sanitary sewer. This option for discharge of treated groundwater was selected due to anticipated quicker timeframe to obtain approval compared to other potential alternatives.

Manatee County Utility Operations (MCUO) is currently in discussion with the FDEP to develop criteria for new industrial or remediation wastewaters that is accepted into the County's sanitary sewer system. Manatee County's current policy is that any new industrial or remediation wastewaters discharged to the County's sanitary sewer must be approved through a Manatee County Government Wastewater Discharge Permit Application (permit application).

Based on initial discussions with MCUO, any treated water discharged to the Manatee County POTW would be subject to the general chemistry and metals criteria outlined below.

Parameter	Unit	Effluent Concentration
General Chemistry		
pH	SU	6.5 – 8.5
Total Suspended Solids	mg/L	1,830
BOD (5-day)	mg/L	7,290
Metals		
Arsenic	mg/L	2.51
Chloride	mg/L	287
Cadmium	mg/L	0.73
Chromium (total)	mg/L	9.90
Copper	mg/L	28.48
Cyanide	mg/L	4.70
Lead	mg/L	1.87
Mercury	mg/L	0.38

Parameter	Unit	Effluent Concentration
Metals (Cont'd)		
Molybdenum	mg/L	1.26
Nickel	mg/L	11.08
Selenium	mg/L	2.11
Silver	mg/L	16.06
Zinc	mg/L	4.78

Currently, VOC discharge limits have not yet been established. These limits will be discussed and established during the permitting process. However, advanced oxidation and carbon polishing will be adequate to treat the impacted groundwater to VOC levels set forth by MCUO. This IRAP is being submitted in conjunction with the completion of the permit application process.

3.1.6 Process and Instrumentation

The groundwater extraction and treatment system will be designed to run continuously without any daily operator attention. The control system will be PLC based and monitor key treatment system parameters. These parameters will include influent tank level, process flowrate, differential pressure across the bag filters, Photo-Cat system alarms, and pump operation. The system parameters and alarms will be able to be remotely monitored via computer to computer software such as PCAnywhere. This will allow the operation of the treatment system to be monitored without an operator being onsite, remotely troubleshoot the treatment system, and remotely shutdown the treatment system. When operating parameters are out of the operating range, the treatment system will automatically shutdown.

The influent tank will be equipped with an ultrasonic level transmitter. This level transmitter will not only control the operation of the process pump but will also signal high and low level alarms to the PLC. The bag filter housings will be equipped with local pressure gauges before and after each unit. The bag filter housing will also have a differential pressure switch which will signal alarm to the PLC upon high differential pressure. The Photo-Cat system will be equipped by the manufacturer with applicable process instrumentation and alarms. The Photo-Cat parameters will be monitored via the PLC control system. The GAC vessel will have a local pressure gauge to monitor fouling of the carbon.

3.1.7 Air Emissions

Air emissions will not be generated by this treatment system.

3.2 Cleanup Target Levels

Cleanup target levels for COCs in Site groundwater are specified in Chapter 62-780.700, F.A.C. as follows:

Chemical of Concern	GCTL (mg/L)	Natural Attenuation Default Concentrations (NADCs) (mg/L)
PCE	0.003	0.3
TCE	0.003	0.3
Cis-1,2-DCE	0.07	0.7
1,1-DCE	0.007	0.07
1,1-DCA	0.07	0.7
1,4-Dioxane	0.0032	0.32

3.3 Performance Objectives

The performance objectives of the IRA are to:

- 1 Remove COC mass from the USAS and LSAS; and
- 2 Hydraulically contain the source area.

The first performance objective, COC mass removal, can be evaluated by periodically measuring groundwater extraction rates and COC concentrations in extracted groundwater prior to treatment. This information can be used to estimate and monitor COC mass removal rates of the PAT system. It is anticipated that initial COC mass removal rates in the PAT system will be relatively fast, and will decrease over time until concentrations in source area groundwater are low.

The second performance objective, hydraulic containment of the source area, can be evaluated by periodically measuring groundwater and surface water elevations at the Site (including water levels within the PAT system) and preparing potentiometric surface maps based on the field data. So long as hydraulic gradients are inward toward the PAT system, and the inward gradients encompass areas where COC concentrations in groundwater are highest, the PAT system can be considered to be achieving this performance objective.

3.4 Cessation Criteria

The groundwater PAT system will be operated until COC concentrations in groundwater are below cessation criteria. Cessation criteria for this IRAP will be either the GCTLs or NADCs for Site-related COCs specified in Chapter 62-777, F.A.C. This decision will be deferred to the Final RAP for the Site.

4. Operation and Maintenance

4.1 Activities

To promote proper operation of the IRA, operation and maintenance (O&M) activities described in this section will be conducted. Additional maintenance requirements/activities are described in the manufacturer's O&M manuals that will be stored at the treatment system.

The operator will be responsible for maintaining records throughout the operation of the treatment system in order to verify performance and document proper treatment system O&M. The operator will be responsible for performing and documenting preventative maintenance tasks on treatment system components. Maintenance performed on system components will be documented on a Facility Maintenance Log. For detailed instruction on performing preventative maintenance on system components, refer to the manufacturer's O&M manuals and vendor literature that will be stored at the treatment system.

Specific O&M activities are summarized below.

4.1.1 Routine O&M

Operating personnel will perform the following routine O&M activities:

- Observe piping/tanks for leaks and spills;
- Observe groundwater treatment system transfer pump during normal operation, and check for leaks, unusual noises, or general indications of poor performance;
- Record instantaneous and totalized system flow rates;
- Record influent tank operating levels;
- Record Photo-Cat operating data; and
- Record bag filter pressures and carbon vessel pressure.

The above described routine O&M will be conducted daily for the first five days of operation and then reduced to weekly.

4.1.2 Monthly O&M

Operating personnel will perform the following O&M activities at least once per month:

- Visually inspect all tanks/equipment, associated piping, and containment for leaks, cracks, chips, exterior corrosion, or other damage;

-
- As practical, visually verify proper operation of instrumentation (operational and free of obstruction). For the flow meters compare the local transmitter display to the flow displayed at the PLC operator interface; and
 - Inspect/test eye wash/safety shower unit.

4.1.3 Equalization Tank Maintenance

During normal operation, the influent tank may contain sediment buildup. The tank should be checked monthly, at a minimum, for sediment buildup and cleared as necessary. The frequency of tank cleaning will be determined by operational experience.

4.1.4 Filter Bag Maintenance

The pressure drop across the bag filters will increase as the bags collect solids. When indicated by the increased pressure drop, the filter in service should be changed with a new filter bag. The frequency of filter bag change outs will be determined by operational experience.

4.1.5 Photo-Cat Maintenance

The Photo-Cat unit requires very little maintenance. However, the unit will require replenishment of pH adjustment chemicals, monthly pH calibrations, and lamp replacement approximately every two years. The frequency of pH adjustment chemical replenishment will be determined by operational experience.

4.1.6 Liquid-Phase GAC Maintenance

The GAC unit is designed to adsorb VOCs that may remain after the Photo-Cat. As the number of available sites for adsorption decreases, breakthrough of VOCs can occur. The only effective means of detecting VOC breakthrough is through sampling. If effluent sampling indicates VOC concentrations approaching the permitted discharge limits, the GAC units should be changed out with a spare unit stored on-site.

There are several additional factors that can indicate a GAC change out is required prior to VOC breakthrough. An abnormal increase or decrease in the effluent pH can indicate a biological buildup (biofouling) in the GAC units. An increase in the pressure drop across the unit may indicate excessive solids loading or biofouling. When the pressure drop increases to a predetermined (based on operational experience) setpoint or the effluent pH is outside the normal operating range, the GAC units should be changed out.

4.1.7 Centrifugal Pumps

Grease motor bearings once every six months, or as recommended by the manufacturer.

4.1.8 System Alarms and Response

System operation set points for various process parameters will be settable by the system operator. The PLC will monitor these parameters and alert the operator of changes in the system operation. The following parameters will be monitored for both “informational” and “system shutdown” alarm conditions:

- High pressure before bag filter units;
- High pressure after bag filter units;
- High pressure before liquid-phase GAC unit; and
- High pressure after liquid-phase GAC units.

System shutdown alarms are also triggered under the following conditions:

- Photo-Cat shutdown;
- High-high level alarm in influent tank;
- Low level alarm in influent tank;
- High differential pressure across bag filter units; and
- Power loss.

All alarms and system operation will be accessible via remote telemetry utilizing the treatment system computer and PCAnywhere software. The PLC, computer, and PCAnywhere software will be used to remotely investigate, correct, reset, and document any alarm conditions that occur. System shutdown will result in activation of the autodialer. The system autodialer is used to alert pre-designated personnel via phone, fax, or e-mail in the case of treatment system critical alarms. For detailed treatment system alarm procedures involving the Photo-Cat, refer to the manufacturer’s O&M manuals that will be stored at the treatment system.

4.1.9 Sampling and Analysis

Sampling and analysis of treated groundwater discharged to the Manatee County POTW will be conducted in accordance with the requirements established by the MCUO. Sewer discharge monitoring will consist of collecting for laboratory analysis, at a minimum, three water samples the first week of operation, weekly samples for the first month, monthly samples for the next two months, and quarterly samples thereafter. Samples will be collected from the sampling port on the discharge side of the liquid-phase GAC unit and submitted for laboratory analysis for parameters specified by MCUO. Sample frequency may be adjusted based on requirements established by MCUO and system performance. A request to alter the frequency or parameters will be made to FDEP and MCUO prior to modifying the sampling and analysis program.

Influent and mid-process monitoring will also be conducted. Influent samples will be collected from the discharge of the equalization tank, and the mid-process samples will be collected between the Photo-Cat and the liquid-phase GAC unit. Samples will initially be collected and submitted for laboratory analysis for the same parameters at the same frequency as the effluent samples. This may change based on operational experience.

4.2 Schedule

As indicated above, monitoring of the treatment system components will be conducted on a routine or monthly basis. In accordance with Chapter 62-780.700(3)(g)1 and (12)(d), F.A.C., influent, effluent, and mid-process sampling will be conducted, at a minimum, three times per week for the first week of operation, weekly for the first month, monthly for the next two months, and quarterly thereafter. The treatment system sampling schedule is outlined in Table 2. However, sampling frequency may be adjusted based on requirements established by the MCUO and system performance.

Within 120 days of initiating the active PAT, Lockheed Martin will provide the FDEP two signed and sealed sets of engineering drawings (As-Built Drawings). The engineering drawings will include all construction and equipment design specifications of the installed active remediation system(s) and any operational parameters different from those in the approved IRAP. A summary of the system(s) startup activities will be included with the engineering drawings.

5. Effectiveness Monitoring

5.1 Overview

In accordance with Chapter 62-780.700(3)(g)2, 3 and 4, F.A.C., effectiveness monitoring of the groundwater recovery system will consist of collecting monthly water levels for the first six months, quarterly groundwater samples and water levels for the first two years following start-up of the PAT system, and semi-annual groundwater samples and water levels beginning in year 3 until cessation of pumping. Groundwater samples will be collected using previously approved sampling methods and shipped to a certified laboratory for analysis of site specific COCs identified in Section 2.3 (VOCs via USEPA Method 8260 and 1,4-dioxane by USEPA Method 8270) to monitor the cleanup progress.

Operational monitoring of the treatment system will consist of collecting influent, effluent, and mid-process samples on three days during the first week, followed by weekly sampling for the first month, monthly sampling for the next two months, and quarterly sampling thereafter. As indicated in the previous section, sampling frequency and parameters may be adjusted at the request of the MCUC. The treatment process monitoring samples will be initially analyzed for parameters specified by the MCUC, but may change based on operational experience.

Table 2 summarizes the schedule for monitoring the groundwater PAT system per Chapter 62-780.700(3)(g), F.A.C.

5.2 Monthly Groundwater Monitoring

Monthly monitoring will occur during the first six months after the groundwater PAT system is started and will involve measurement of water levels at a specified subset of USAS, LSAS and IAS monitoring wells. The purpose of this portion of the monitoring program is to monitor the development of the groundwater capture zones in the USAS and LSAS and verify that the PAT system is providing hydraulic control of the source area. The data will be used to prepare potentiometric surface contour maps and delineate capture zones in the USAS and LSAS. Monthly monitoring reports will be submitted to FDEP showing the results. After the six-month monthly monitoring is finished, water levels will be collected on a quarterly basis as discussed in Section 5.3.

Groundwater levels will be measured at the following on- and off-site monitoring wells:

USAS Monitoring Wells

- All proposed USAS extraction wells
- MW-2
- MW-3
- MW-4
- MW-5
- MW-6
- MW-7S
- MW-7D
- MW-8S
- MW-8D

-
- MW-9S
 - MW-9D
 - MW-10
 - MW-11
 - MW-12
 - MW-13D
 - MW-14S
 - MW-14D
 - MW-15S
 - MW-15D
 - MW-17S
 - MW-17D
 - MW-30
 - MW-32
 - MW-35
 - MW-36
 - MW-38
 - MW-40
 - MW-42
 - MW-70
 - MW-71
 - MW-72
 - MW-76

LSAS Monitoring Wells

- All proposed LSAS extraction wells
- MW-33
- MW-37
- MW-39
- MW-41
- MW-43
- MW-48
- MW-77
- MW-78
- MW-79
- MW-80
- MW-81
- MW-84
- MW-87

IAS Monitoring Wells

- MW-127
- MW-128

5.3 Quarterly Groundwater Monitoring

In accordance with Chapter 62-780.700(3)(g)4, F.A.C., quarterly groundwater monitoring will occur during the first two years after the groundwater PAT system is started and will involve collecting groundwater samples from the monitoring well listed below and measuring water levels at the US AS, LSAS and IAS monitoring wells listed in Section 5.2. Additionally, during the last quarterly sampling event each calendar year (i.e., October), groundwater samples will be collected from the US AS, LSAS and IAS monitoring wells listed in Section 5.2. The purpose of this two-year monitoring program will be to monitor the COC mass removal rates of the IRAP, changes in COC concentrations over time during operation of the IRAP, and monitor the extent of the capture zones after the first six months of system operation. The data will be used to estimate COC mass removal rates, evaluate changes in COC concentrations over time, prepare potentiometric surface contour maps, and delineate capture zones in the US AS and LSAS. Quarterly monitoring reports will be submitted to FDEP summarizing the monitoring results. After one year of quarterly groundwater monitoring, quarterly monitoring locations and sample analyses will be re-evaluated, and modifications to the quarterly monitoring program may be suggested to the FDEP. After two years of quarterly monitoring, groundwater samples and water level measurements will be collected on a semi-annual basis as discussed in Section 5.4.

In accordance with Chapter 62-780.700(3)(g)2, F.A.C., groundwater samples will be collected quarterly from the following wells and analyzed for the COCs (VOCs via USEPA Method 8260 and 1,4-dioxane by USEPA Method 8270) to monitor the cleanup progress. A proposal to change sample locations, frequency, or analytical methods may be proposed in the quarterly monitoring reports for approval by FDEP, if warranted based on system performance.

Due to the dimension of the area of highest groundwater concentrations (source) and the radial nature of groundwater flow from the source area, several source area and down-gradient monitoring wells were selected from both the US AS and LSAS to evaluate the change in COC concentrations in groundwater over time. Mainly monitoring wells screened on top of the hard streak or at the base of the US AS were selected for quarterly monitoring because these wells exhibit greater impacts than the shallower US AS monitoring wells. Also, two IAS monitor wells below the SAS source area will be monitored to evaluate any vertical influence the PAT system may have on the IAS.

US AS Monitoring Wells (screened on top of hard streak/base of the US AS)

- MW-15D (down/cross gradient edge)
- MW-35 (up/cross gradient edge)
- MW-36 (source area)
- MW-38 (source area)
- MW-42 (source area)
- MW-70 (down gradient edge)
- MW-71 (down gradient edge)
- MW-72 (down/cross gradient edge)
- MW-76 (down/cross gradient edge)

LSAS Monitoring Wells

- MW-37 (source area)
- MW-39 (source area)
- MW-43 (source area)

-
- MW-77 (cross gradient edge)
 - MW-78 (up gradient - impacted)
 - MW-79 (cross/down gradient edge)
 - MW-81 (down gradient edge)
 - MW-84 (cross/down gradient edge)
 - MW-87 (up gradient - impacted)

IAS Monitoring Wells

- MW-127 (vertically down gradient)
- MW-128 (vertically down gradient)

5.4 Semi-Annual Groundwater Monitoring

After the two-year quarterly monitoring program is complete, groundwater monitoring will occur on a semi-annual basis until cessation of pumping. As discussed in Section 3.4, cessation criteria will be presented in the Final RAP for the Site. The first semi-annual sampling event each calendar year (i.e., April) will be similar to quarterly monitoring and involve collecting groundwater samples and measuring water levels at the USAS, LSAS and IAS monitoring wells listed in Section 5.3. Additionally, during the second semi-annual sampling event each calendar year (i.e., October), groundwater samples will be collected from the USAS, LSAS and IAS monitoring wells listed in Section 5.2. The purpose of the semi-annual groundwater monitoring program will be to monitor COC mass removal rates, changes in COC concentrations over time during operation of the IRAP, and the extent of the capture zones. The data will be used to evaluate changes in COC concentrations over time, prepare potentiometric surface contour maps, and delineate capture zones in the USAS and LSAS. Semi-annual monitoring reports will be submitted to FDEP summarizing the monitoring results. After one year of semi-annual groundwater monitoring, monitoring locations and sample analyses will be re-evaluated, and modifications to the semi-annual monitoring program may be proposed to the FDEP for approval.

5.5 Water Treatment Process and Compliance Monitoring

As discussed in Section 4.1.9, influent samples will be collected from the discharge of the equalization tank. Effluent samples will be collected from the discharge of the liquid-phase GAC unit, and mid-process monitoring will be conducted between the Photo-Cat unit and the liquid-phase GAC unit.

Sampling frequency will be based on Manatee County POTW requirements. However, BBL anticipates that sampling activities will be conducted on three days during the first week, followed by weekly sample collection for the first month, monthly sample collection for the next two months, and quarterly sample collection thereafter.

Samples will be submitted for laboratory analysis for Manatee County POTW established requirements. Reporting for all collected process and compliance monitoring will be in accordance with Manatee County POTW requirements.

6. Implementation Schedule

The schedule shown on Figure 11 presents the anticipated major activities associated with the implementation of the IRAP. As indicated on Figure 11, detailed design activities associated with the IRA will be conducted in conjunction with FDEP review and approval of this IRAP. Following FDEP approval of the IRAP, which is estimated to occur in mid-January 2006, mobilization to the site and equipment procurement will begin. Equipment procurement will require approximately 12 weeks due to the anticipated delivery of the advanced oxidation system. During equipment procurement activities, extraction well installation activities will be completed and equipment installation activities will begin. Following receipt of the advanced oxidation system, final installation activities will be completed and system startup is anticipated for early-May 2006.

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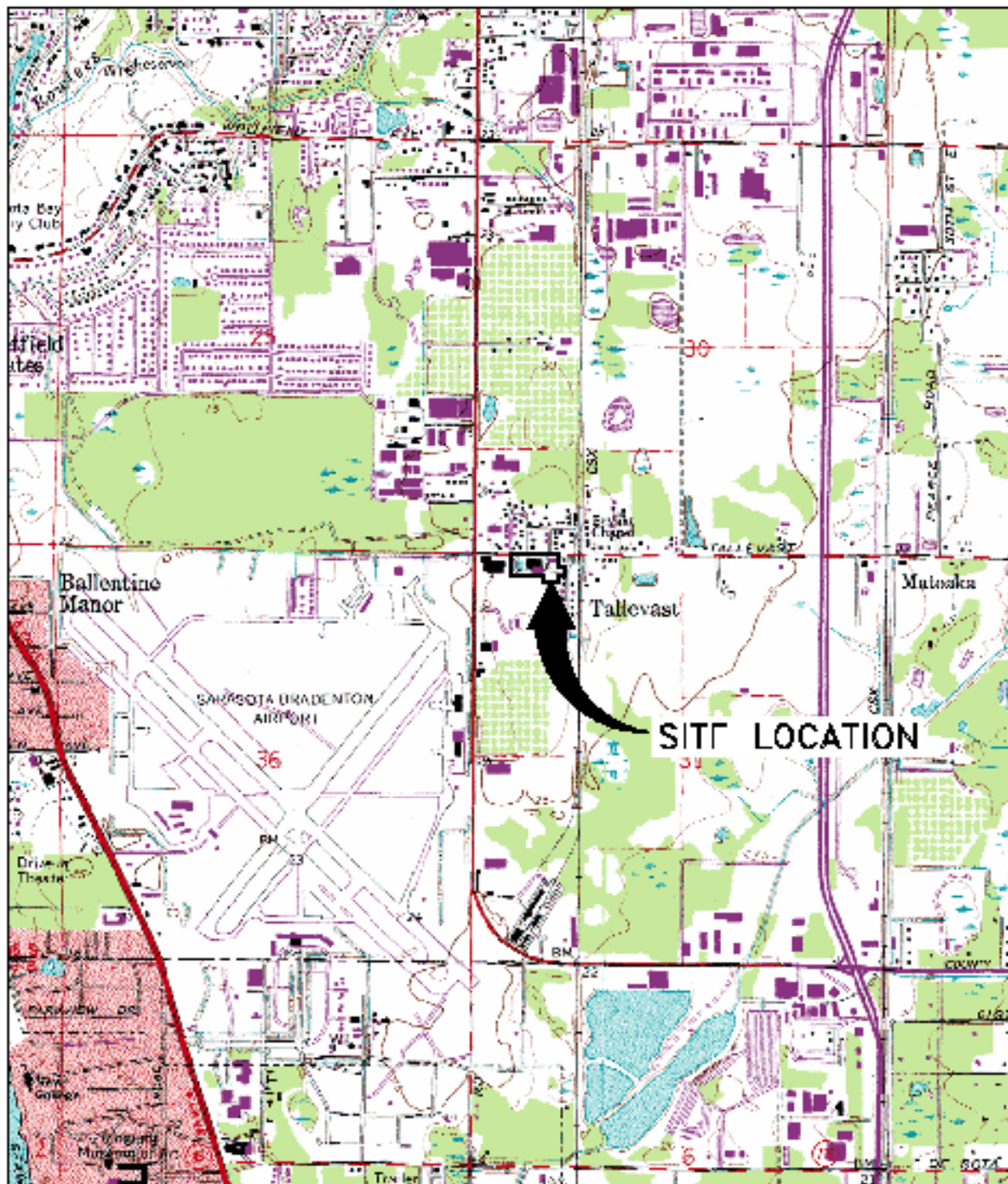
Tables

TABLE 1

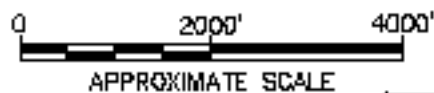
FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLahasT, FLORIDAEVALUATION OF SELECTED REMEDIAL ALTERNATIVES
(SRA) UNDER CERCLA AND RCRA AT THE AMERICAN BERYLLIUM COMPANY SITE, TALLahasT, FLORIDA

Evaluation Criteria	Basis of Selection
Long-term and short-term human health and environmental effects	Groundwater PAI is protective of human health and the environment provided that the private wells within the plume area are closed and not used for consumption and/or irrigation. Moreover, the proposed groundwater PAI has no air emissions, and wastewater effluent will be directly discharged to the sanitary sewer in accordance with POTW standards.
Implementability	Groundwater PAI is a common, well-established remedial technology that uses conventional modular equipment which will facilitate implementation. Further, implementation is largely non-invasive and will not cause a major disruption or outage to WPI operations or other community resources.
Operation and maintenance requirements	Routine operation and maintenance includes automated, remote monitoring as well as periodic manual inspection and maintenance. This level of operation and maintenance is commensurate with comparable remedial technologies.
Reliability	The proposed system includes the use of proven and well-established technology, and includes appropriate alarms and controls to ensure reliable operation.
Feasibility	Groundwater PAI is a feasible and well-established technology.
Estimated time required to achieve cleanup	Not applicable for the IRAP - This PAI system is intended to provide short-term mass removal and hydraulic control in and around the source area, and is intended only as an interim measure. The future Remedial Action Plan will identify a long-term remedy, and will evaluate estimated time to cleanup once site assessment activities are complete.
Cost-effectiveness	Groundwater PAI is a cost-effective technology, particularly as an interim measure.

Figures



RIITRFRNCI: BASE MAP SOURCE USGS 7.5 MINUTE QUADS, SERIES BRADENTON, FLORIDA, 1984, PHOTOREVISED 1987.



ARFA LOCATION

FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN

SITE LOCATION MAP



FIGURE

1



LEGEND:

- SITE BOUNDARY
- ++++ RAILROAD TRACKS
- x-x- FENCE
- ⊕ MW-79 MONITORING WELL

NOTE:

1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



**FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN**

SITE PLAN

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

X: 38037X00.DWG, 38037X01.BMP
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/9/05 SYR-85-GMS
38037001/38037B02.DWG



- LEGEND:**
- SITE BOUNDARY
 - ||||| RAILROAD TRACKS
 - x-x- FENCE
 - ⊕ MW-79 MONITORING WELL
 - WATERTABLE ELEVATION CONTOUR IN FEET (AMSL)
(DASHED WHERE INFERRED)
 - (27.49) GROUNDWATER ELEVATION IN FEET (AMSL)
 - ➔ DIRECTION OF HYDRAULIC GRADIENT

- NOTES:**
1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.
 2. WATER LEVEL DATA COLLECTED ON 5/10/05 AND 5/11/05.



FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN
WATER TABLE ELEVATIONS
AND CONTOURS IN THE USAS -
MAY 2005



X: 38037X00.DWG, 38037X01.BMP
 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 12/15/05 SYR-85-GMS SDL GMS
 38037001/38037001.DWG



LEGEND:

- SITE BOUNDARY
- RAILROAD TRACKS
- FENCE
- MW-79 MONITORING WELL
- GROUNDWATER POTENTIOMETRIC ELEVATION CONTOUR IN FEET (AMSL) (DASHED WHERE INFERRED)
- (21.78) GROUNDWATER ELEVATION IN FEET
- DIRECTION OF HYDRAULIC GRADIENT

- NOTES:**
1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.
 2. WATER LEVEL DATA COLLECTED ON 5/10/05 AND 5/11/05.

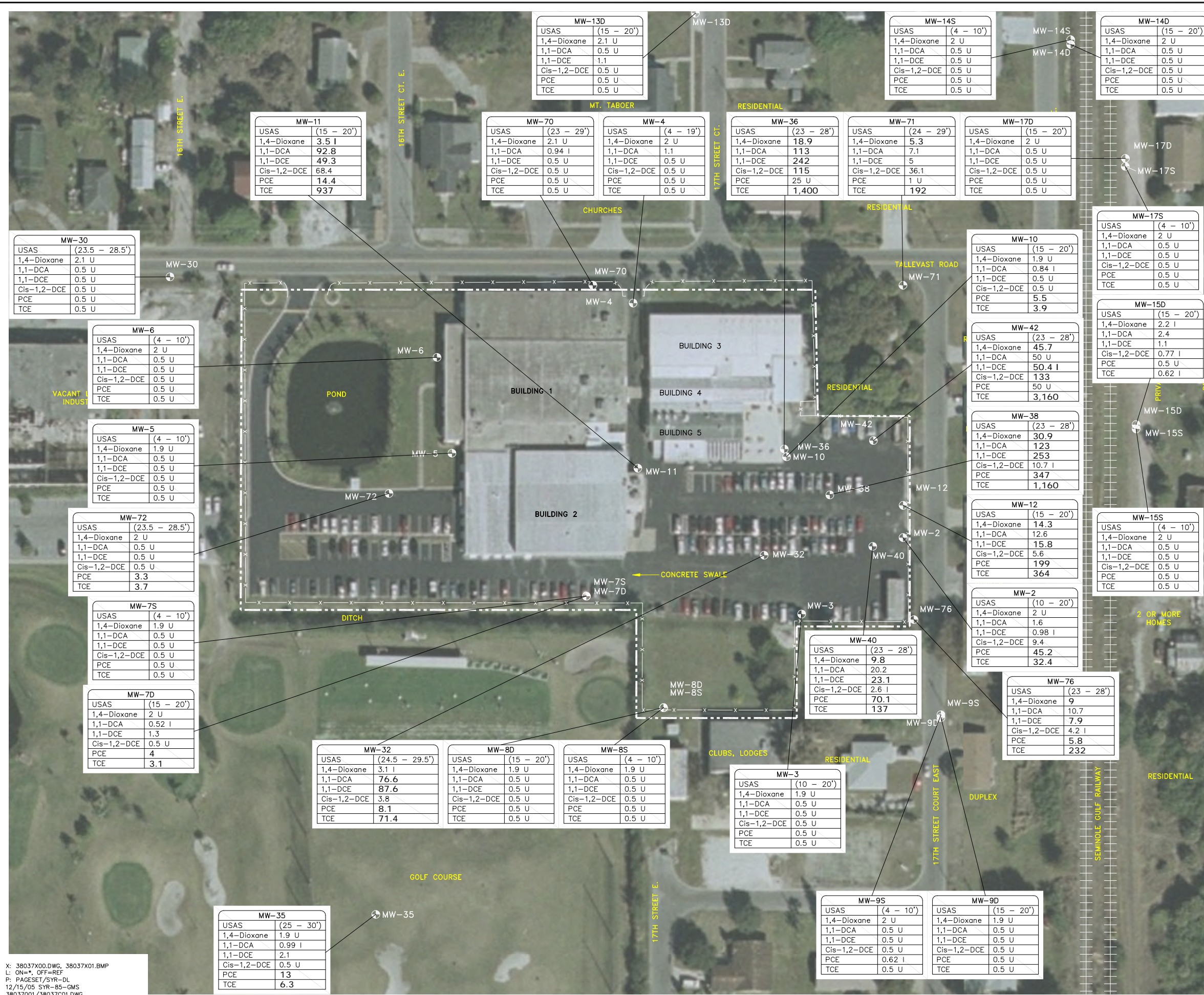


FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN

**GROUNDWATER POTENTIOMETRIC
SURFACE ELEVATIONS AND
CONTOURS IN THE LSAS - MAY 2005**



X: 38037X00.DWG, 38037X01.BMP
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/15/05 SYR-85-GMS SDL GMS
38037001/38037W02.DWG



LEGEND:

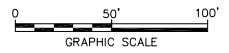
- SITE BOUNDARY
- ||||| RAILROAD TRACKS
- x-x- FENCE
- MW-71 USAS MONITORING WELL

RESULTS COMPARED TO GROUNDWATER TARGET CLEANUP LEVELS (GTCLs):

- | MW-10 (15 - 20') | | MONITORING WELL ID |
|------------------|--------|---|
| USAS | 1.9 U | MONITORING WELL SCREEN INTERVAL (FEET BELOW GROUND SURFACE) |
| 1,4-Dioxane | 1.9 U | RESULT < GTCL |
| 1,1-DCA | 0.84 I | RESULT > GTCL (BOLD) |
| 1,1-DCE | 1.1 | RESULT < GTCL |
| Cis-1,2-DCE | 0.77 I | RESULT > GTCL (BOLD) |
| PCE | 0.5 U | RESULT < GTCL |
| TCE | 0.62 I | RESULT > GTCL (BOLD) |
- I= REPORTED VALUE IS BETWEEN THE LABORATORY DETECTION LIMIT AND THE LABORATORY PRACTICAL QUANTITATION LIMIT
 U= CONCENTRATION WAS BELOW LABORATORY DETECTION LIMIT

NOTES:

- GTCLs FOR EACH COC ARE LISTED IN SECTION 3.2 OF THE IRAP.
- ALL CONCENTRATIONS REPORTED IN ug/L.
- ALL RESULTS ARE PROVIDED IN TABLE 3.9 OF THE SARA II.
- BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.

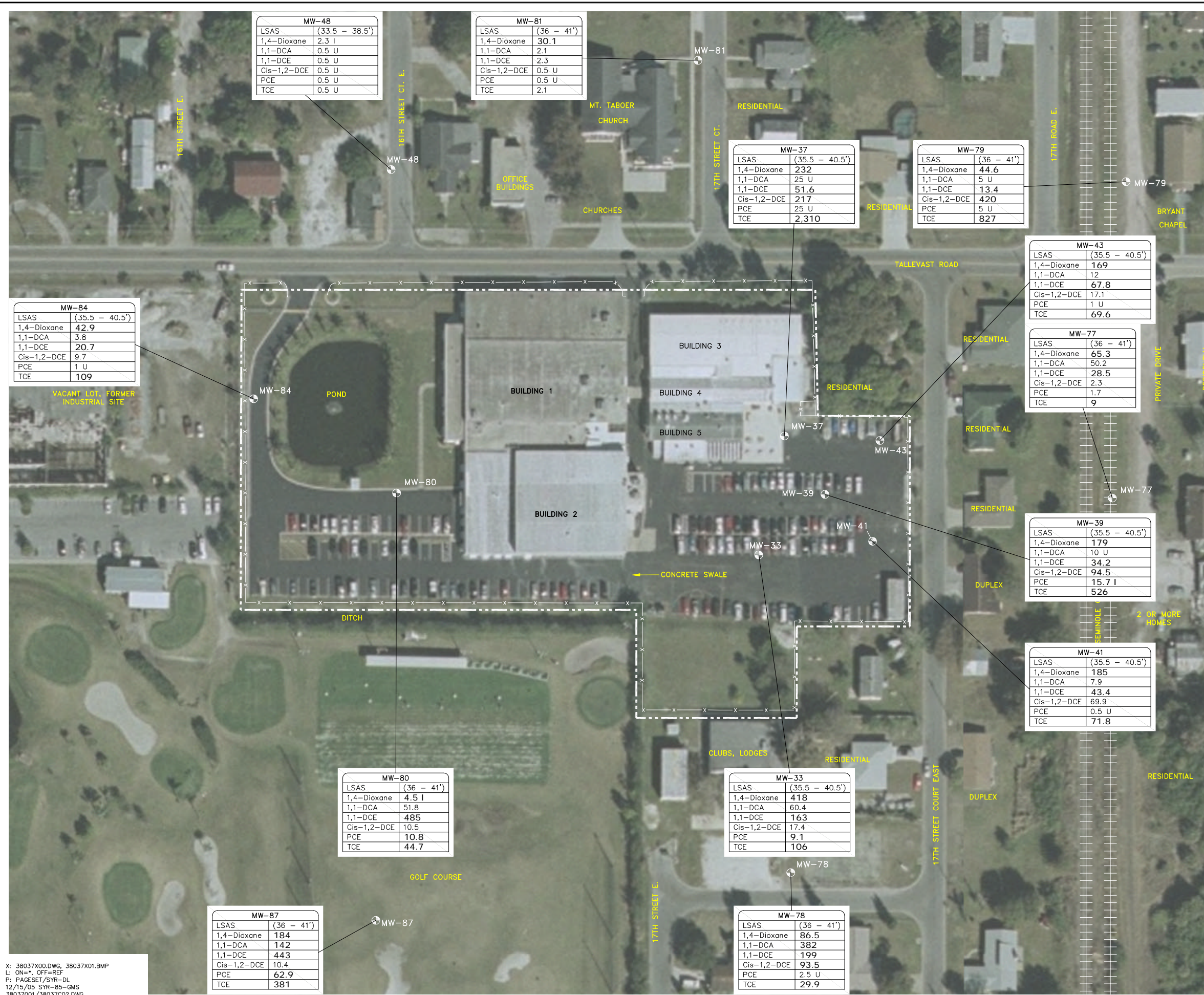


**FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
 INTERIM REMEDIAL ACTION PLAN**

**GROUNDWATER ANALYTICAL RESULTS
 FOR USAS - JUNE/JULY 2005**



X: 38037X00.DWG, 38037X01.BMP
 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 12/15/05 SYR-85-GMS
 38037001/38037001.DWG



MW-48	
(33.5 - 38.5')	
LSAS	2.3 I
1,4-Dioxane	0.5 U
1,1-DCA	0.5 U
1,1-DCE	0.5 U
Cis-1,2-DCE	0.5 U
PCE	0.5 U
TCE	0.5 U

MW-81	
(36 - 41')	
LSAS	30.1
1,4-Dioxane	2.1
1,1-DCA	2.3
1,1-DCE	0.5 U
Cis-1,2-DCE	0.5 U
PCE	0.5 U
TCE	2.1

MW-37	
(35.5 - 40.5')	
LSAS	232
1,4-Dioxane	25 U
1,1-DCA	51.6
1,1-DCE	217
Cis-1,2-DCE	25 U
PCE	2,310
TCE	

MW-79	
(36 - 41')	
LSAS	44.6
1,4-Dioxane	5 U
1,1-DCA	13.4
1,1-DCE	420
Cis-1,2-DCE	5 U
PCE	827
TCE	

MW-43	
(35.5 - 40.5')	
LSAS	169
1,4-Dioxane	12
1,1-DCA	67.8
1,1-DCE	17.1
Cis-1,2-DCE	1 U
PCE	69.6
TCE	

MW-77	
(36 - 41')	
LSAS	65.3
1,4-Dioxane	50.2
1,1-DCA	28.5
1,1-DCE	2.3
Cis-1,2-DCE	1.7
PCE	9
TCE	

MW-39	
(35.5 - 40.5')	
LSAS	179
1,4-Dioxane	10 U
1,1-DCA	34.2
1,1-DCE	94.5
Cis-1,2-DCE	15.7 I
PCE	526
TCE	

MW-41	
(35.5 - 40.5')	
LSAS	185
1,4-Dioxane	7.9
1,1-DCA	43.4
1,1-DCE	69.9
Cis-1,2-DCE	0.5 U
PCE	71.8
TCE	

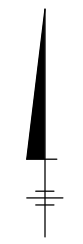
MW-80	
(36 - 41')	
LSAS	4.5 I
1,4-Dioxane	51.8
1,1-DCA	485
1,1-DCE	10.5
Cis-1,2-DCE	10.8
PCE	44.7
TCE	

MW-33	
(35.5 - 40.5')	
LSAS	418
1,4-Dioxane	60.4
1,1-DCA	163
1,1-DCE	17.4
Cis-1,2-DCE	9.1
PCE	106
TCE	

MW-78	
(36 - 41')	
LSAS	86.5
1,4-Dioxane	382
1,1-DCA	199
1,1-DCE	93.5
Cis-1,2-DCE	2.5 U
PCE	29.9
TCE	

MW-87	
(36 - 41')	
LSAS	184
1,4-Dioxane	142
1,1-DCA	443
1,1-DCE	10.4
Cis-1,2-DCE	62.9
PCE	381
TCE	

MW-84	
(35.5 - 40.5')	
LSAS	42.9
1,4-Dioxane	3.8
1,1-DCA	20.7
1,1-DCE	9.7
Cis-1,2-DCE	1 U
PCE	109
TCE	



LEGEND:

- SITE BOUNDARY
- ||||| RAILROAD TRACKS
- x-x- FENCE
- MW-79 LSAS MONITORING WELL

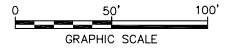
RESULTS COMPARED TO GROUNDWATER TARGET CLEANUP LEVELS (GTCLs):

MW-77		
(36 - 41')		
LSAS	65.3	MONITORING WELL ID
1,4-Dioxane	50.2	MONITORING WELL SCREEN INTERVAL (FEET BELOW GROUND SURFACE)
1,1-DCA	28.5	RESULT < GTCL
1,1-DCE	2.3	RESULT < GTCL
Cis-1,2-DCE	1.7	RESULT < GTCL
PCE	9	RESULT > GTCL (BOLD)
TCE		

I= REPORTED VALUE IS BETWEEN THE LABORATORY DETECTION LIMIT AND THE LABORATORY PRACTICAL QUANTITATION LIMIT
 U= CONCENTRATION WAS BELOW LABORATORY DETECTION LIMIT

NOTES:

1. GTCLs FOR EACH COC ARE LISTED IN SECTION 3.2 OF THE IRAP.
2. ALL CONCENTRATIONS REPORTED IN ug/L.
3. ALL RESULTS ARE PROVIDED IN TABLE 3.9 OF THE SARA II.
4. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
 INTERIM REMEDIAL ACTION PLAN
 GROUNDWATER ANALYTICAL RESULTS
 FOR LSAS - JUNE/JULY 2005



X: 38037X00.DWG, 38037X01.BMP
 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 12/15/05 SYR-85-GMS
 38037001/3803702.DWG

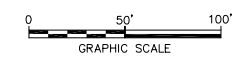


LEGEND:

- SITE BOUNDARY
- RAILROAD TRACKS
- FENCE
- MW-79 MONITORING WELL
- CONCEPTUAL GROUNDWATER EXTRACTION WELL LOCATION IN UPPER AND LOWER SURFICIAL AQUIFER
- LOCATION OF CONCEPTUAL HYDROGEOLOGIC CROSS SECTION OF PROPOSED IRA

NOTE:

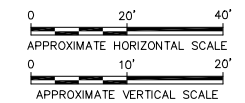
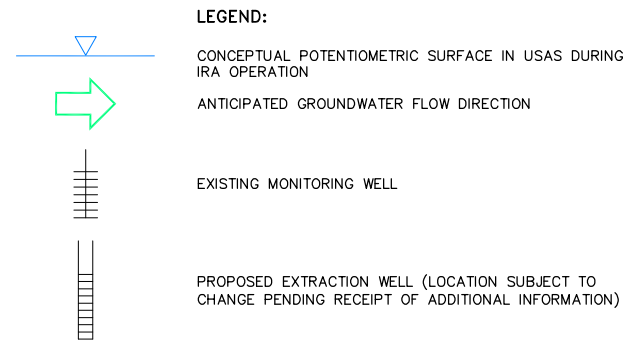
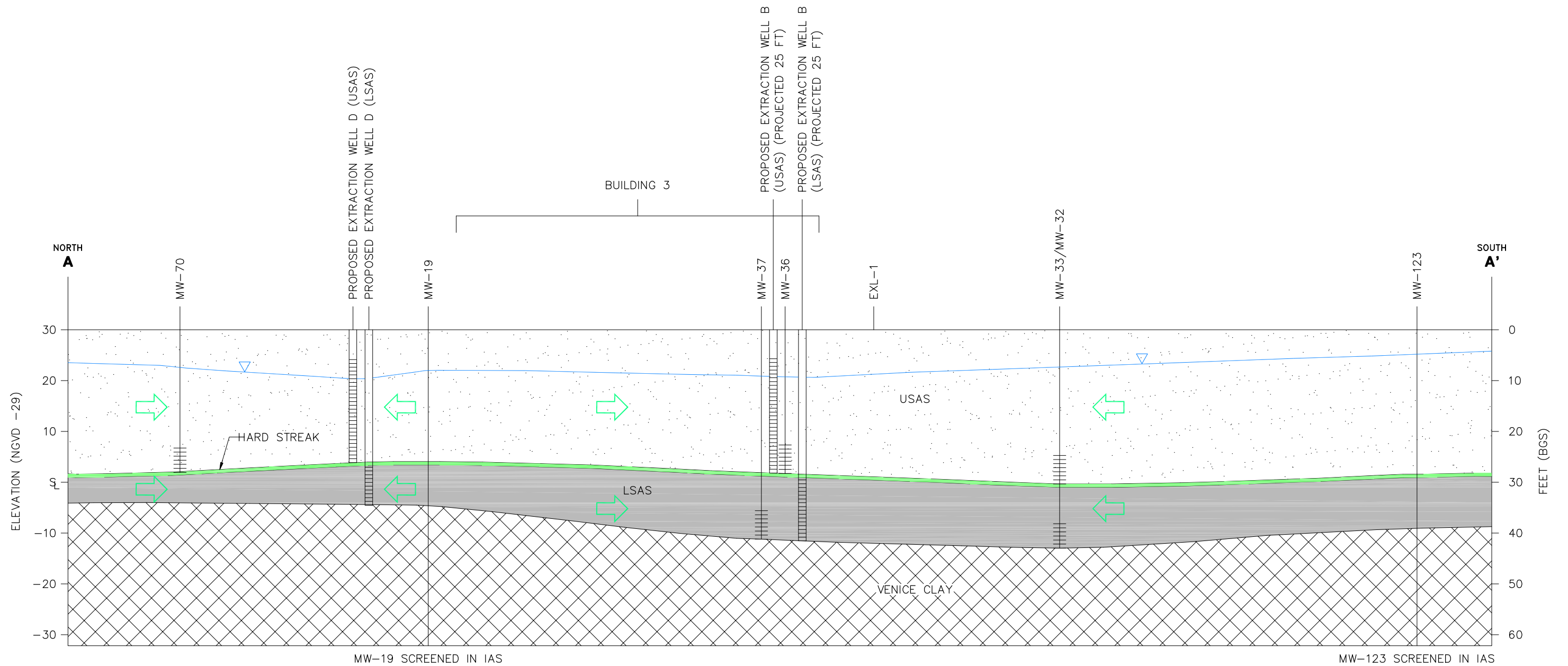
1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



**FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN**

PROPOSED IRA SITE PLAN

X: 38037X00.DWG, 38037X01.BMP
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/13/05 SYR-85-GMS SDL
38037001/38037B03.DWG

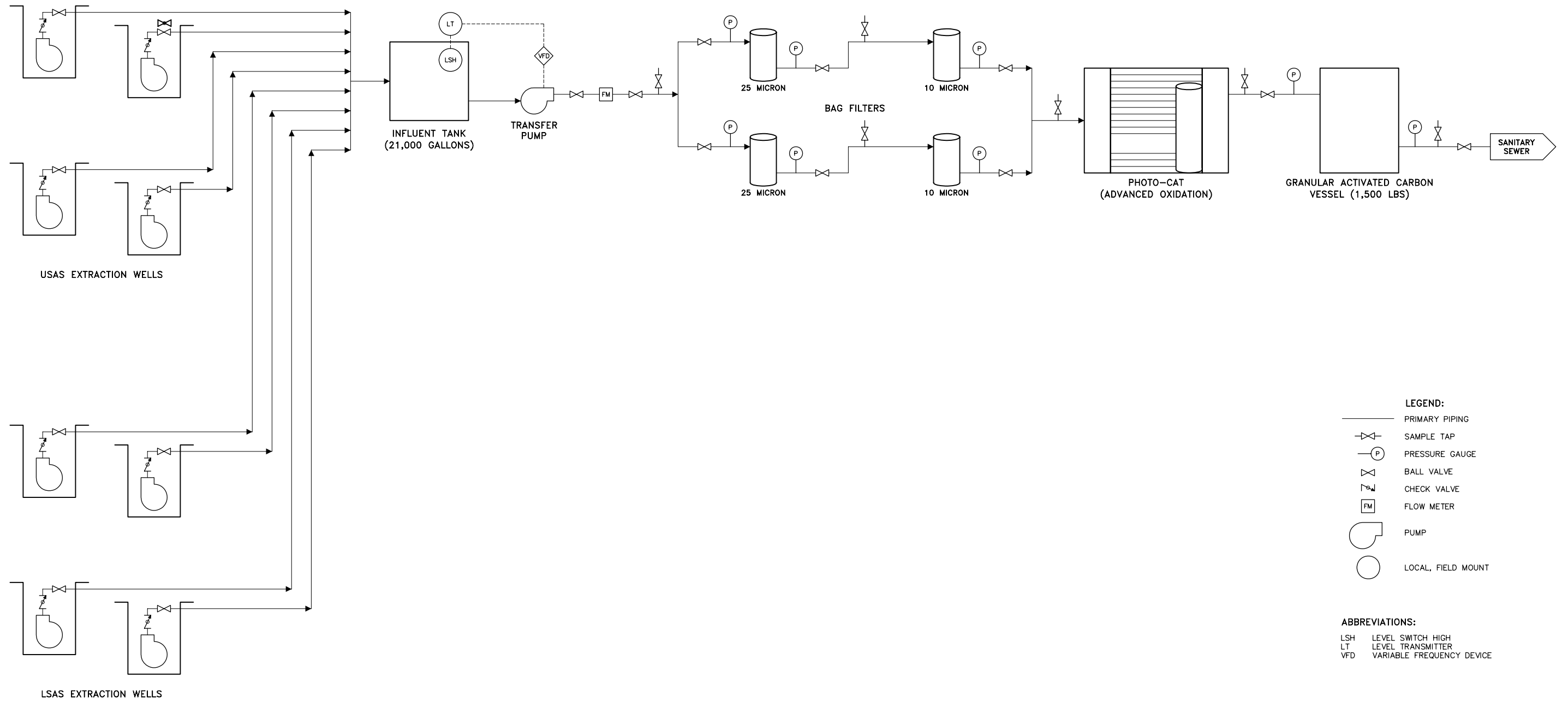


FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
 INTERIM REMEDIAL ACTION PLAN

**CONCEPTUAL HYDROGEOLOGIC
 CROSS SECTION OF PROPOSED IRA**

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

FIGURE
8



- LEGEND:**
- PRIMARY PIPING
 - X— SAMPLE TAP
 - (P)— PRESSURE GAUGE
 - X— BALL VALVE
 - |— CHECK VALVE
 - [FM]— FLOW METER
 - PUMP
 - (O)— LOCAL, FIELD MOUNT

- ABBREVIATIONS:**
- LSH LEVEL SWITCH HIGH
 - LT LEVEL TRANSMITTER
 - VFD VARIABLE FREQUENCY DEVICE

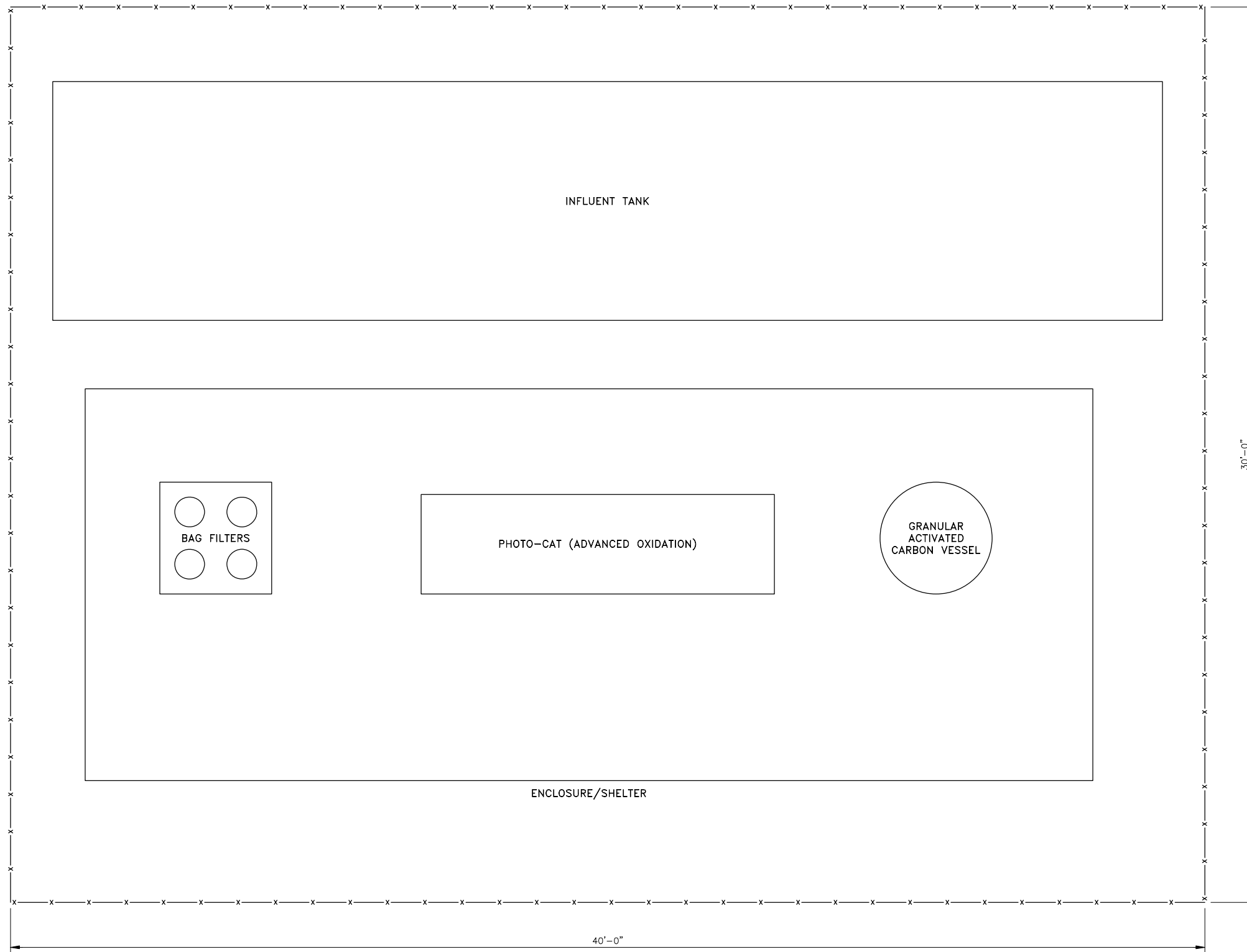
FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN

**PROPOSED IRA PROCESS
FLOW DIAGRAM**

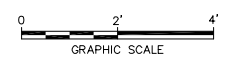


FIGURE
9

X: 38037X00.DWG
L: ON=*, OFF=REF*
P: PAGESET/PLT-DL
12/13/05 SYR-85-DJP SDL
38037001/38037002.DWG



LEGEND:
 —x— CHAIN LINK FENCE



FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
 INTERIM REMEDIAL ACTION PLAN

TREATMENT COMPOUND LAYOUT

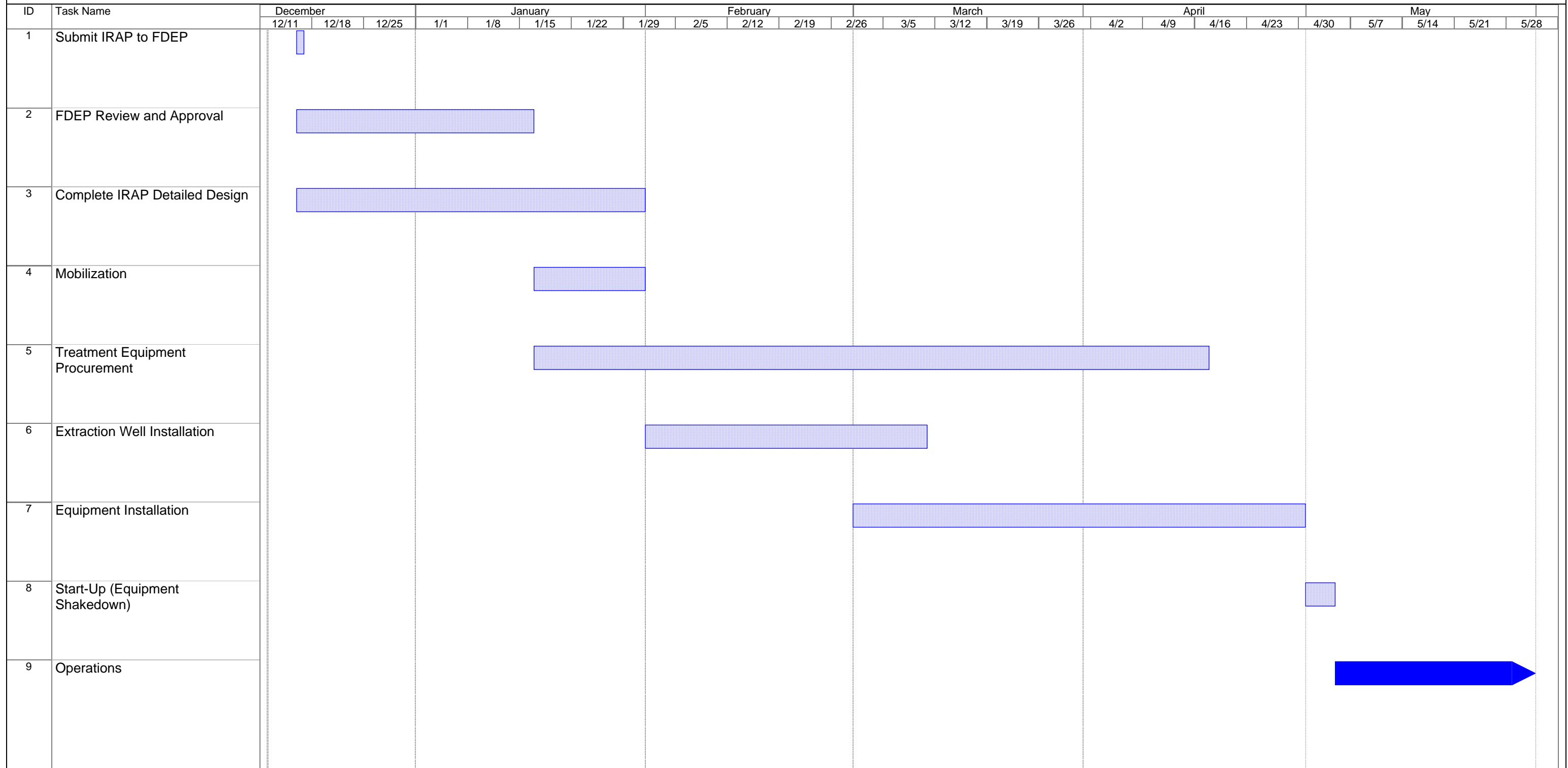
BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

FIGURE
10

X: 38037X00.DWG
 L: ON=*, OFF=REF*
 P: PAGESET/PLT-DL
 12/13/05 SYR-85-TJR DJP SDL
 38037001/38037G01.DWG

**FIGURE 11 - IMPLEMENTATION SCHEDULE
FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA**

INTERIM REMEDIAL ACTION PLAN (IRAP) IMPLEMENTATION



Appendix A

**Remedial Action Plan
Summary Form**



Interim

Remedial Action Plan Summary

DEP Form # 62-780.900(4)
Form Title: Remedial Action Plan
Summary
Effective Date: 4-17-05

Site Name: _____

DEP Site ID No. OGC #04-1328

Location: _____

Current Date: _____

CHECK ALL THAT APPLY:

Date of Last GW Analysis: _____

Media Contaminated: Groundwater Sediment Soil Air

Type(s) of Product(s) Discharged:

Method of Groundwater Disposal:

- Gasoline / Kerosene Analytical Group
- Listed Hazardous Waste
- Other types of contaminants (solvents, etc.)

- Infiltration Gallery Sanitary Sewer
- Surface Discharge/NPDES Injection Well
- Other _____

List: _____

Plume Characteristics:

- Estimated Mass (lbs):
Groundwater TBD* Soil _____
- Area of Plume _____ (ft²)
- Depth of Plume _____ (ft)

Method of Soil Remediation: NA for this IRAP

- Excavation:
Volume to be excavated _____ (yds³)
- Thermal Treatment Land Farming On Site
- Landfill Bioremediation
- Other _____

Groundwater Recovery and Specifications:

- No. of Recovery Wells _____
 Vertical Horizontal
- Design Flow Rate/Well _____ (gpm)
- Total Flow Rate _____ (gpm)
- Hydraulic Conductivity _____ (ft/day)
- Recovery Well Screen Interval _____ (ft)
- Depth to Water _____ (ft)

- Vapor Extraction System (VES):
- No. of Venting Wells _____
 Vertical Horizontal
- VES - Applied Vacuum _____ (wg)
- Design Air Flow Rate _____ (cfm)
- Design Radius of Influence _____ (ft)
- Air Emissions Treatment
 Thermal Oxidizer Catalytic Converter
 Carbon Other _____

Method of Groundwater Remediation:

- Pump-and-Treat:
 - Air Stripper
 Low Profile Packed Tower
 - Diffused Aerator
 - Activated Carbon
 Primary Treatment Polishing
- In Situ Air Sparging - Pressure: _____ (psi)
 - No. of Sparge Points _____
 Vertical Horizontal
 - Design Air Flow Rate/Well _____ (cfm)
 - Total Air Flow Rate _____ (cfm)
- Biosparging:
 - No. of Sparge Points _____
 Vertical Horizontal
 - Design Air Flow Rate/Well _____ (cfm)
- Bioremediation:
 - In Situ Ex Situ
- Other _____

- Soil Bioventing:
 - No. of Venting Wells _____
 Vertical Horizontal
 - Design Air Flow Rate _____ (cfm)
- In Situ Bioremediation
- Other _____

Natural Attenuation:

- Groundwater Soil
- Method of Evaluation:
 - Historical Trends
 - Site-Specific Parameters

Estimated Time of Cleanup: TBD* (days)

- Free Product Present:** Yes No
 - Estimated Volume _____ (gal)
 - Maximum Thickness _____ (in)
 - Method of Recovery _____

- Method of Estimation:
 - Pore Volumes (no. of pore vols. = _____)
 - Exponential Decay (Decay Rate) _____ (day⁻¹)
 - Groundwater Transport Model _____
 - Other _____

* = To be determined as part of the Remedial Action Plan for the entire Site.

Appendix B

Pumping Test and Capture Zone Evaluation

*Pumping Test & Capture
Zone Analyses*

**Former American Beryllium
Company Site
1600 Tallevast Road
Tallevast, Florida**

December 2005

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B-2	Summary of Wells Monitored During LSAS Pumping Test
B-3	Data Used in Distance-Drawdown Evaluation: USAS Pumping Test
B-4	Data Used in Distance-Drawdown Evaluation: LSAS Pumping Test
B-5	Summary of Groundwater Quality Results

Figures

B-1	USAS Pumping Test Layout September 2005
B-2	LSAS Pumping Test Layout September 2005
B-3	Distance-Drawdown Data: USAS Pumping Test
B-4	Distance-Drawdown Data: LSAS Pumping Test
B-5	USAS Estimated Capture Zone
B-6	LSAS Estimated Capture Zone

Attachments

B-1	Pumping Test Data
-----	-------------------

1. Introduction

1.1 Purpose and Objectives

In accordance with the Remedial Action Work Plan (RAWP, TetraTech, Inc. [TetraTech, 2005]), TetraTech conducted one 48-hour and one 24-hour pumping test in the Surficial Aquifer System (SAS) at the Former American Beryllium Company Site (Site) located in Tallahassee, Florida. The 48-hour pumping test was conducted in the Upper Surficial Aquifer System (USAS) which extends from 2 to 5 feet below ground surface (bgs) to a depth of approximately 30 feet bgs. The USAS 6-inch-diameter pumping well was screened from 15 to 30 feet bgs, and installed on-site just east of Building 5. The 24-hour pumping test was conducted in the Lower Surficial Aquifer System (LSAS) which extends approximately between 35 and 40 feet bgs. The 6-inch-diameter, fully penetrating pumping well was screened between 35.5 and 40.5 feet bgs, and installed on-site just south of Building 5.

The purpose and objectives of the pumping test as described in the RAWP were to:

- Obtain information of the sustainable yield of the target aquifer zones;
- Observe the area of influence that can be achieved by pumping;
- Estimate aquifer parameters (hydraulic conductivity and storage coefficients);
- Identify hydraulic connectivity and interference between aquifer zones;
- Measure the concentration of the contaminants of concern (COCs) in the extracted groundwater; and
- Evaluate the effectiveness and efficiency of advanced oxidation technologies for treatment of extracted groundwater.

In addition, the pumping test data from TetraTech provided relevant information to support the development of the Basis of Design for the Interim Remedial Action Plan (IRAP). Specifically, Blasland, Bouck & Lee, Inc. (BBL) has used the pumping test data to:

- Estimate the number, location, and pumping rate of wells that may be required to capture on-site groundwater where highly concentrated COCs are present;
- Perform an evaluation of the distance-drawdown data produced from the tests to estimate the potential shape and size of the capture zone that may result by operating a system of extraction wells at the same per-well rates used during the pumping tests; and
- Measure the concentration of the COCs in the extracted groundwater.

1.2 Hydrogeologic Characteristics

The hydrogeology of the site was also characterized in Section 2 of the IRAP. This portion of Manatee County is relatively flat and generally within 30 feet of mean sea level. A local topographic high point is near the southwest portion of the Site. Groundwater in the SAS is encountered at approximately three to five feet bgs. The SAS is further subdivided into the USAS composed of fine to medium grained sands (approximately 30 feet in thickness), and the LSAS consisting of a thin layer of fossiliferous carbonate and clayey gravel (approximately 5 feet in thickness). The SAS is separated from the Floridan Aquifer by the Venice Clay and carbonate units of the upper Arcadia Formation that form the intermediate aquifer system (IAS), approximately 300 feet in thickness. The Venice Clay forms the upper confining unit of the IAS and is between 30 to 40 feet in thickness. Strong downward hydraulic gradients exist between the USAS and the LSAS, with an approximately 5 to 7 foot head drop across the approximately 1- to 1.4-foot thick, partially cemented layer known as the "hard streak" that separates the two units. Similarly, the vertical component of the hydraulic gradient is downward between the LSAS and the IAS, with an approximately 5 foot head drop across Venice Clay and the clayey confining units in the upper 100 to 200 feet of the IAS.

The Site is adjacent to the northeastern corner of the Sarasota/Bradenton airport. The surrounding area is primarily mixed commercial/residential, with an abandoned industrial facility, a golf course and undeveloped land to the west and south and private residences mixed with undeveloped land in the other directions surrounding the site. The golf course is reportedly the site of a former automotive salvage yard. Multiple residential water supply wells are in close proximity to the Site. Previous surveys conducted by Lockheed Martin indicate over 50 residential water supply wells within a quarter-mile radius of the site. These wells are typically completed into the IAS. The presence of these wells is significant in that they provide a direct hydraulic connection between discrete water bearing units.

Site-specific water level measurements obtained in May 2005 indicate that, in plan view, groundwater flow mirrors the topography of the area, and may also be influenced by irrigation on the adjacent golf course. The regional hydraulic gradient direction in the USAS is primarily toward the north, and that there are localized radial groundwater flow patterns away from the Site toward the northwest, north, and northeast. In the LSAS, a potentiometric mound is observed at the golf course, with a generally northward hydraulic gradient at the Site. Site-specific flow in the IAS is predominantly to the west, consistent with regional conditions; however, there also appears to be some radial impact to flow in this system.

2. Pumping Test Procedures

2.1 Pumping Test Layout

The layout for the USAS pumping test consisted of one pumping well and eleven monitoring wells ranging in radial distance of approximately 18 feet to 422 feet from the pumping well (see Table B-1 and Figure B-1). The USAS pumping test monitoring wells consisted of USAS, LSAS, and IAS wells as follows:

- Seven USAS monitoring wells screened in the bottom 5 feet of the aquifer between approximately 23 feet and 28 feet bgs;
- Two LSAS monitoring wells screened between approximately 35 feet and 40 feet bgs; and
- Two IAS monitoring wells (one IAS monitoring well screened between 100 feet and 110 feet in the Upper Acadian Formation Gravels, and one IAS monitoring well screened between 140 feet and 150 feet in the Upper Acadian Formation Salt and Pepper Sands).

The layout for the LSAS pumping test consisted of one pumping well and eleven monitoring wells ranging in radial distance of approximately 12 feet to 422 feet from the pumping well (see Table B-2 and Figure B-2). The LSAS pumping test monitoring wells consisted of USAS, LSAS, and IAS wells as follows:

- Four USAS monitoring wells screened in the bottom 5 feet of the aquifer between approximately 23 feet and 28 feet bgs;
- Five LSAS monitoring wells screened between approximately 35 feet and 40 feet bgs; and
- Two IAS monitoring wells (one IAS monitoring well screened between 100 feet and 110 feet in the Upper Acadian Formation Gravels, and one IAS monitoring well screened between 140 feet and 150 feet in the Upper Acadian Formation Salt and Pepper Sands).

The purpose of these layouts was to allow for the collection of time- and distance-drawdown water level measurements during performance of 48-hour and 24-hour pumping tests in the USAS and LSAS, respectively.

2.2 Pumping and Observation Well Installation

To accomplish the objectives of the pumping tests, two 6-inch-diameter pumping wells and two additional monitoring wells were installed at the locations shown on Figures B-1 and B-2.

The USAS and LSAS pumping wells (EXU-1 and EXL-1, respectively) were constructed of 6-inch-diameter PVC well materials and were screened from approximately 15 to 30 feet bgs for EXU-1 and 35.5 feet to 40.5 feet bgs for EXL-1. The intake portion of the pumping wells had 0.020-inch width slots.

Two monitoring wells were installed using as follows:

-
- One IAS monitoring well (MW-127) was installed approximately 18 feet from EXU-1 and 39 feet from EXL-1 in the Upper Acadian Formation Gravel Sands and was screened between 100 feet and 110 feet bgs; and
 - One IAS monitoring well (MW-128) was installed approximately 34 feet from EXU-1 and 12 feet from EXL-1 in the Upper Acadian Formation Salt and Pepper Sands and was screened between 140 feet and 150 feet bgs.

2.3 Surface Water and Barometric Pressure Monitoring Stations

One surface water monitoring station was established in the small pond located on-site west of Buildings 1 and 2. Water levels in the pond were monitored throughout the duration of the pumping tests. Tidal data was obtained from the NOAA/NO/CO-OPS Station #8726384 in Port Manatee, Florida, approximately 20 miles north of the Site. Hourly barometric pressure data was obtained from a weather station in Sarasota, Florida. Precipitation data was obtained both on-site during the test and from the NOAA weather station at the Sarasota/Bradenton International Airport.

2.4 Time Drawdown Data Collection

The USAS pumping test was performed by extracting groundwater from pumping well EXU-1 at a nearly constant rate of 3 gallons per minute (gpm) (variable during this first 30 minutes of the test) and measuring water levels at the monitoring wells and in the on-site pond. Water levels were measured using data-logging pressure transducers installed in the pumping well and four of the USAS monitoring wells and manually using hand-held water level meters at all monitoring wells. The data-logging pressure transducers were programmed to record water level measurements at 5-second (0.08-minute) increments throughout the pumping test.

The 48-hour USAS pumping test was conducted between September 21, 2005 at 6:50 am and September 23, 2005 at 7:02 am, when the pump was turned off. The data-logger and manual gauged water level measurements recorded water-level recovery data for up to 12 hours. After sufficient water-level recovery data were collected, the data loggers were stopped and data were downloaded from the transducers. The data is summarized in Table B-3. All recovered groundwater was containerized, treated, and discharged to the publicly owned treatment works (POTW).

The LSAS pumping test was performed by extracting groundwater from pumping well EXL-1 at a nearly constant rate of 5 gallons per minute (gpm) (variable during this first 50 minutes of the test) and measuring water levels at the monitoring wells and in the on-site pond. Water levels were measured using data-logging pressure transducers installed in the pumping well, three LSAS monitoring well and one background USAS monitoring well (MW-72) and manually using hand-held water level meters at all monitoring wells. The data-logging pressure transducers were programmed to record water level measurements at 5-second (0.08-minute) increments throughout the pumping test.

The 24-hour LSAS pumping test was conducted between September 23, 2005 at 8:05 pm and September 24, 2005 at 8:05 pm, when the pump was turned off. The data-logger and manual gauged water level measurements recorded water-level recovery data for up to 34 hours. After sufficient water-level recovery data were collected, the data loggers were stopped and data were downloaded from the transducers. The data is summarized in Table B-4. All recovered groundwater was containerized, treated, and discharged to the POTW.

2.5 Groundwater Quality Sampling

On-site testing of extracted groundwater was completed during both the USAS and LSAS pumping tests. All extracted groundwater during the pumping tests was collected into a 6,000 gallon tank. Water was pumped from this collection tank to a Purifics ES Inc., on-site Photo-Cat system. Prior to treatment of groundwater within the Photo-Cat system, groundwater was filtered using a 10 um cartridge filter and influent samples were analyzed for key organic concentration, 1,4-dioxane, and other VOC concentrations.

Extracted groundwater during the USAS test was collected for analysis prior to entering the Photo-Cat treatment system. Influent samples into the Photo-Cat system were analyzed on September 21, 2005 at 7:35 am (45 minutes after the start of pumping) and 1:15 pm (6 hours and 25 minutes after the start of pumping); on September 22, 2005 at 12:15 pm (approximately 29.5 hours after the start of pumping) and 5:00 pm (approximately 34 hours after the start of pumping); on September 23, 2005 at 10:30 am (approximately 3.5 hours after the cessation of pumping) and 2:00 pm (approximately 7 hours after the cessation of pumping). Since water was held in the collection tank prior to sampling, the time that each sample was extracted from the aquifer is unknown. Results from the on-site water quality analysis of USAS extracted groundwater are presented in Table B-5.

Prior to extracting groundwater from the LSAS, all USAS groundwater remaining in the collection tank was pumped out. Only one influent sample was analyzed for water quality parameters on September 24, 2005 at 10:00 am, approximately 14 hours after the start of pumping during the LSAS test. Results from the on-site water quality analysis of LSAS extracted groundwater are presented in Table B-5.

3. Preliminary Estimate of Capture Zone

3.1 Introduction

The capture zone analysis presented below is based on the design parameters described in Section 3 (Basis of Design) of the IRAP Report. This analysis utilizes a distance-drawdown evaluation based on the per-well pumping rates demonstrated during the USAS and LSAS pumping tests to predict the drawdown and capture zone that may potentially be achieved by four proposed pumping wells in the USAS and two proposed pumping wells in the LSAS.

3.2 Observed Pumping Rate and Drawdown

The USAS pumping test was completed between September 21 and 23, 2005. Following the first 30 minutes of pumping, during which pumping-rate adjustments were made, the pumping rate was held constant at 3 gpm. Pumping rates were measured by recording elapsed time and flow meter readings as the test progressed. The pumping rate was checked every 2 to 10 minutes during the first 30 minutes and every 10 to 60 minutes for the remainder of the test. Figures summarizing time-drawdown and pumping rate data from the USAS pumping test are included in the Attachment B-1.

Manually gauged and level-logger water level measurements were converted to drawdown values which were used to create a distance-drawdown graph for the USAS pumping test (Figure B-3). The distance-drawdown data used to create Figure B-3 are listed in Table B-3. Figure B-3 illustrates the resulting drawdown after approximately 1.94 days of pumping (just prior to the cessation of pumping) as observed using manual measurements for the monitoring wells screened in the USAS and level-logger data for the pumping well (EXU-1). Theoretically, when drawdown data are plotted versus to log of distance (from observation well to pumping well), a straight line can be fit through the distance-drawdown data to predict the effect of pumping at any distance from the pumped well. The slope of the straight line can be used to estimate values of transmissivity and storativity for the aquifer (Driscoll, 1986).

The LSAS pumping test was completed between September 23 and 24, 2005. Following the first 50 minutes of pumping, during which pumping-rate adjustments were made, a constant pumping rate of 5 gpm was maintained. The pumping rate was checked every 5 minutes during the first 75 minutes and every 10 to 60 minutes for the remainder of the test. Figures summarizing time-drawdown and pumping rate data from the LSAS pumping test are included in the Attachment B-1.

Similar to the USAS pumping test, manually gauged and level-logger water level measurements were converted to drawdown and used to create a distance-drawdown graph for the LSAS pumping test (Figure B-4). The distance-drawdown data used to create Figure B-4 is listed in Table B-4. Figure B-4 illustrates the resulting drawdown after approximately 0.96 days of pumping (just prior to the cessation of pumping) as observed using manual measurements for the monitoring wells screened in the LSAS and level-logger data for the pumping well (EXL-1). To be conservative, it was assumed that the drawdown immediately outside of the pumping well was approximately half of the measured in-well drawdown.

3.3 Capture Zone Estimation

3.3.1 USAS Capture Zone

The distance-drawdown relationship for the USAS was used to estimate values of transmissivity and storativity as mentioned above. These values were then used, in conjunction with the pumping rate applied during the test, to estimate the drawdown distribution for a longer period of pumping. The non-equilibrium equation developed by Theis (Theis, 1935) was used to predict the effect of pumping from each of four conceptual extraction wells after 90 days of pumping. The drawdown created by one extraction well after 90 days as predicted by the Theis solution is also shown on Figure B-3. Since the September 2005 USAS pumping test data indicate that drawdown observed at the monitoring wells was less than 20% of the initial saturated thickness of the aquifer, a correction to the Theis solution was not required to account for the unconfined nature of the aquifer.

A straight-line fit to the Theis solution on the semilog plot was used to predict the drawdown that would be expected at each USAS monitoring well in the existing on- and off-site monitoring network. By superimposing the predicted drawdown from each of the four conceptual extraction wells, the resulting drawdown at each of the network monitoring wells was calculated. Where May 2005 water table elevation data was available, the predicted drawdown was subtracted from the static water table elevation at each monitoring well resulting in an estimate of the predicted water table elevation after 90 days of pumping from four conceptual extraction wells pumping at a rate of 3 gpm each.

The resulting predicted groundwater elevation across the USAS was used to estimate the capture zone that would be created from the four conceptual extraction wells. For the USAS, these extraction wells were designated as USAS wells A, B, C, and D. The approximate location of the extraction wells relative to USAS network monitoring wells and a preliminary estimate of the capture zone created are presented in Figure B-5. Results of the capture zone analysis suggest the potential for capture of on-site groundwater east of the pond (where COC concentrations are shown to be highest) as well as possibly a limited amount of groundwater in the USAS located north, east, and south of the site.

3.3.2 LSAS Capture Zone

The distance-drawdown relationship obtained from the LSAS pumping test indicates that the effects of pumping extended well beyond the furthest LSAS monitoring well (MW-41) during the 24-hour test. A straight line on the semilog plot of distance-drawdown data (Figure B-4) was fit through the monitoring well data and extended back to where the drawdown predicted immediately adjacent to the pumping well was equal to half of the observed drawdown in the pumping well. This created a straight line that predicts a drawdown of approximately 6.75 feet just outside the well bore and a drawdown of approximately 4.25 feet at a radial distance of 100 feet from the pumping well.

The equation of this curve was then used to predict the drawdown that would be expected at each LSAS monitoring well in the existing on- and off-site monitoring network after 0.96 days of pumping from one conceptual well at 5 gpm. For this analysis, only two conceptual extraction wells (designated as LSAS wells A and B) were used to estimate the resulting capture zone. By superimposing the predicted drawdown from each of the two conceptual extraction wells, the resulting drawdown at each of the network monitoring wells was calculated. Where May 2005 water table elevation data was available, the predicted drawdown was subtracted from the static water table elevation at each monitoring well resulting in an estimate of the predicted water table elevation after 0.96 days of pumping from two conceptual extraction wells pumping at a rate of 5 gpm each.

The resulting predicted groundwater elevation across the LSAS was used to estimate the capture zone that would be created from the two conceptual extraction wells. The approximate location of the extraction wells relative to LSAS network monitoring wells and a preliminary estimate of the capture zone created are presented in Figure B-6. Results of the capture zone analysis suggest the potential for capture of nearly all onsite groundwater as well as possibly a limited amount of groundwater in the LSAS located north, east, and south of the site. The most appropriate onsite location for additional extraction wells in the LSAS (conceptual wells C and D) will be selected, if necessary, after several months of monitoring the performance of proposed extraction wells A and B.

3.4 Quality of Extracted Groundwater

On-site analytical results for samples of extracted groundwater collected during the pumping tests are summarized in Table B-5. Purifics reported that four samples were sent to an off-site laboratory for confirmation of the results. Laboratory results were found to agree reasonably well with on-site results (Purifics, 2005). On-site analytical testing revealed the following regarding the quality of extracted groundwater during the pumping test:

- Alkalinity is 3 times greater in the LSAS (220 parts per million [ppm]) than in the USAS (60 – 80 ppm);
- The concentration of chlorides in the LSAS (100 – 120 ppm) is approximately 1.5 times greater than in the USAS (60 – 80 ppm);
- 1,1-Dichloroethene concentration were similar for the USAS and LSAS reaching a maximum of 190 micrograms per liter ($\mu\text{g/L}$) in the USAS and 160 $\mu\text{g/L}$ in the LSAS;
- *cis*-1,2-dichloroethene concentration were over 4 times greater in the USAS (reaching 280 $\mu\text{g/L}$) than in the LSAS (60 $\mu\text{g/L}$);
- Trichloroethene concentrations in extracted groundwater increased from 540 $\mu\text{g/L}$ to 11,000 $\mu\text{g/L}$ during the USAS pumping test while in the LSAS was reported at a concentration of 920 $\mu\text{g/L}$;
- Tetrachloroethene in both the USAS and LSAS was below 10 $\mu\text{g/L}$ where detected. Several USAS samples were below detection (< 200 $\mu\text{g/L}$); and
- 1,4-Dioxane concentrations in the USAS extracted groundwater remained between 200 and 300 $\mu\text{g/L}$ for the duration of the test. Concentrations of 1,4-dioxane were over 3 times greater in the LSAS (990 $\mu\text{g/L}$).

4. Conclusions

The 48-hour USAS pumping test and 24-hour LSAS pumping test performed at the Site in September 2005 accomplished the objectives outlined in Section 1.1. Additionally, the USAS pumping test data were used to estimate aquifer parameters such as transmissivity and storativity for the USAS. The pumping test results were used to provide hydrogeologic and groundwater quality data to support design analyses presented in Section 3 of the IRAP. In summary, the pumping test results indicate the following:

- The distance-drawdown data suggest that the effects of pumping at distances beyond approximately 120 feet from the pumping well are negligible after 2 days of pumping from one well at 3 gpm within the USAS;
- The distance-drawdown data suggest that the effects of pumping at approximately 120 feet from the pumping well result in over 4 feet of drawdown after nearly 1 day of pumping from one well at 5 gpm within the LSAS;
- The transmissivity value for the USAS was estimated from distance-drawdown data to be approximately 106 ft²/day;
- The storativity value for the USAS was estimated from distance-drawdown data to be approximately 0.0295 (dimensionless);
- Four extraction wells in the USAS (wells A, B, C, and D), pumping at a rate of at least 3 gpm each, may be capable of capturing on-site groundwater with highly concentrated COCs in the USAS;
- Two extraction wells (wells A and B) in the LSAS, pumping at a rate of at least 5 gpm each, may be capable of capturing on-site groundwater with highly concentrated COCs in the LSAS;
- The preliminary estimate of the USAS capture zone suggests that groundwater may be contained on-site east of the pond and to some extent off-site to the north, east and south, after 90 days of pumping at four wells (approximately 3 gpm each) - groundwater elevation monitoring during operation of the first four wells will be used to verify the USAS capture zone and determine the need for system adjustments, if any;
- The preliminary estimate of the LSAS capture zone suggest that groundwater can be contained on-site and to some extent off-site to the north, east and south after a shorter period of pumping at two wells (approximately 5 gpm each) - groundwater elevation monitoring during operation of the first two wells will be used to verify the LSAS capture zone and determine the need for system adjustments, if any;
- Alkalinity and chlorides concentration were reported several times greater in the LSAS than the USAS;
- Trichloroethene was reported as the highest concentration COC in the USAS (11,000 µg/L) and second highest concentration COC in the LSAS (920 µg/L);
- 1,4-Dioxane was reported as the highest concentration COC in the LSAS (990 µg/L) and the second highest concentration COC in the USAS (300 µg/L); and
- Concentrations of most COCs analyzed during the 48-hour USAS pumping test increased as pumping progressed and reached nearly steady concentrations during the second day of pumping.

5. References

Driscoll, F.G. 1986. *Groundwater and Wells*. Johnson Screens, St. Paul, Minnesota, pp. 236-238.

Punifics, 2005. *Test Report, Photo-Cat Treatment of Groundwater at the Former ABC Site – Sarasota*, Submitted to Tetra Tech November 4, 2005.

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Theis, C. V. 1935. *The relation between the lowering of the piezometric surface and the rate and duration of discharge of a well using groundwater storage*. *Trans. Amer. Geophys. Union*, 2, pp. 519-524.

Tables

TABLE B-1
SUMMARY OF WELLS MONITORED DURING USAS PUMPING TEST

INTERIM REMEDIATION ACTION PLAN
FORMER AMERICAN BERYLLIUM PHOSPHATE SITE
TALLEVAST, FLORIDA

Pumping or Monitoring Well	Groundwater Zone	Distance to EXU-1 (ft)	Screened Interval (ft bgs)	Water Level Gauging Method
EXU-1	USAS	0	15 - 30	level logger
MW-36	USAS	18	23 - 28	manual; level logger
MW-127	IAS	19	100 - 110	manual
MW-37	LSAS	22	35.5 - 40.5	manual
MW-128	IAS	34	140 - 150	manual
MW-38	USAS	55	23 - 28	manual; level logger
MW-32	USAS	115	24.5 - 29.5	manual; level logger
MW-33	LSAS	117	35.5 - 40.5	manual
MW-71	USAS	195	24 - 29	manual
MW-76	USAS	208	23 - 28	manual
MW-70	USAS	270	23 - 29	manual
MW-72	USAS	422	23.5 - 28.5	level logger

TABLE B-2
SUMMARY OF WELLS MONITORED DURING LSAS PUMPING TEST

INTERIM REMEDIATION ACTION PLAN
FORMER AMERICAN BERYLLIUM PHOSPHATE SITE
TALLEVAST, FLORIDA

Pumping or Monitoring Well	Groundwater Zone	Distance to EXL-1 (ft)	Screened Interval (ft bgs)	Water Level Gauging Method
EXL-1	LSAS	0	35.5 - 40.5	level logger
MW-128	IAS	13	140 - 150	manual
MW-36	USAS	34	23 - 28	manual
MW-127	IAS	39	100 - 110	manual
MW-37	LSAS	47	35.5 - 40.5	manual; level logger
MW-39	LSAS	54	23 - 28	manual; level logger
MW-32	USAS	76	24.5 - 29.5	manual
MW-33	LSAS	77	35.5 - 40.5	manual; level logger
MW-42	USAS	109	23 - 28	manual
MW-43	LSAS	115	35.5 - 40.5	manual
MW-41	LSAS	118	35.5 - 40.5	manual
MW-72	USAS	422	23.5 - 28.5	level logger

TABLE B-3
DATA USED IN DISTANCE-DRAWDOWN EVALUATION
USAS PUMPING TEST

INTERIM REMEDIATION ACTION PLAN
FORMER AMERICAN BERYLLIUM PHOSPHATE SITE
TALLEHAST, FLORIDA

Pumping or Monitoring Well	Groundwater Zone	Distance to EXL 1 (ft)	Elapsed Time ¹ (min)	Elapsed Time (days)	Observed Drawdown (ft)	Source of Data
EXU-1	USAS	0	2790	1.94	20.1 ²	Leve Hogger
MU-35	USAS	18	2784	1.93	1.81	Manually Gaged
MU-127	IAS	19	N/A	N/A	N/A	N/A
MU-37	LSAS	22	N/A	N/A	N/A	N/A
MU-128	IAS	34	N/A	N/A	N/A	N/A
MU-38	USAS	55	2791	1.94	0.82	Manually Gaged
MU-32	USAS	115	2789	1.94	0.08	Manually Gaged
MU-33	LSAS	117	N/A	N/A	N/A	N/A
MU-71	USAS	195	2795	1.94	0.01	Manually Gaged
MU-76	USAS	208	2793	1.94	0 ³	Manually Gaged
MU-70	USAS	270	2798	1.94	0.01	Manually Gaged
MU-72	USAS	422	2790	1.94	0.1	Leve Hogger

Notes:

N/A: Distance-drawdown data not used. Well is not screened in the USAS.

¹ Water levels were manually gaged approximately 100 minutes prior to the cessation of pumping.

² Cessation of pumping occurred after 2895 minutes. Drawdown observed in the pumping well was also 20.1 feet after 2895 minutes.

³ No gage observed drawdown. Drawdown value set to zero.

TABLE B-4
 DATA USED IN DISTANCE-DRAWDOWN EVALUATION
 LSAS PUMPING TEST

INTERIM REMEDIATION ACTION PLAN
 FORMER AMERICAN BERYLLIUM PHOSPHATE SITE
 TALLEVA ST, FLORIDA

Pumping or Monitoring Well	Groundwater Zone	Distance to EXL 1 (ft)	Elapsed Time ¹ (min)	Elapsed Time (days)	Observed Drawdown (ft)	Source of Data
EXL-1	LSAS	0	1378	0.96	13.5	Leve Hogger
MON-128	IAS	13	N/A	N/A	N/A	N/A
MON-36	USAS	34	N/A	N/A	N/A	N/A
MON-127	IAS	39	N/A	N/A	N/A	N/A
MON-37	LSAS	47	1387	0.96	4.39	Manually Gauged
MON-39	LSAS	54	1357	0.94	3.08	Manually Gauged
MON-32	USAS	76	N/A	N/A	N/A	N/A
MON-33	LSAS	77	1379	0.96	4.32	Manually Gauged
MON-42	USAS	109	N/A	N/A	N/A	N/A
MON-43	LSAS	115	1386	0.96	4.25	Manually Gauged
MON-41	LSAS	118	1384	0.96	4.24	Manually Gauged
MON-72	USAS	422	N/A	N/A	N/A	N/A

Note:

N/A: Distance-drawdown data not used. Well is not screened in the LSAS.

¹ Water levels were manually gauged approximately 60 minutes prior to the cessation of pumping.

TABLE B-6
SUMMARY OF GROUNDWATER QUALITY RESULTS
INTERIM REMEDIATION ACTION PLAN
FORMER AMERICAN BERYLLIUM PHOSPHATE SITE
TALLEVA ST, FLORIDA

Parameter	Units	USA'S						LSA'S
		9/21/2005 7:35 AM	9/21/2005 1:15 PM	9/22/2005 12:15 PM	9/22/2005 5:00 PM	9/23/2005 10:30 AM	9/23/05 2:00 PM	9/24/05 10:00 AM
Alkalinity ¹	ppm	60 - 80						220
Iron ¹	ppm	7 - 8						2
Chlorides ¹	ppm	60 - 80						100 - 120
Vinyl Chloride	ug/L	< 1.0	1.2	< 100	< 100	110	< 200	2.1
1,1-Dibloroethylene	ug/L	12.8	25.1	190	120	< 100	< 200	160
c-1,2-dibloroethylene	ug/L	35.6	95.1	< 100	280	270	270	60
Trichloroethylene	ug/L	540	2,800	7,500	10,000	10,000	11,000	920
Tetrachloroethylene	ug/L	3.7	4.8	< 100	< 100	< 100	< 200	1
1,4-Dioxane	ug/L	300	300	200	250	250	250	990

Notes:

ppm - parts per million

ug/L - micrograms per liter

¹ - Inorganic concentrations reported as a range over duration of pumping test.

Figures

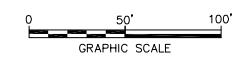


X: 38037X00.DWG, 38037X01.BMP
 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 12/9/05 SYR-85-GMS
 38037001/38037B04.DWG

- LEGEND:**
- SITE BOUNDARY
 - ++++ RAILROAD TRACKS
 - x-x- FENCE
 - EXU-1 (circle with dot) PUMPING WELL INSTALLED BY TETRA TECH
 - MW-37 (circle with dot) MONITORING WELL INSTALLED BY TETRA TECH

NOTE:

1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
 INTERIM REMEDIAL ACTION PLAN

**USAS PUMPING TEST LAYOUT
 SEPTEMBER 2005**

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

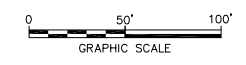
FIGURE
B-1



- LEGEND:**
- SITE BOUNDARY
 - ++++ RAILROAD TRACKS
 - x-x- FENCE
 - EXL-1 (circle with dot) PUMPING WELL INSTALLED BY TETRA TECH
 - MW-37 (circle with dot) MONITORING WELL INSTALLED BY TETRA TECH

NOTE:

1. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN

**LSAS PUMPING TEST LAYOUT
SEPTEMBER 2005**




FIGURE
B-2

X: 38037X00.DWG, 38037X01.BMP
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/9/05 SYR-85-GMS
38037001/38037B05.DWG

FIGURE B-3
 DISTANCE-DRAWDOWN DATA: USAS PUMPING TEST

INTERIM REMEDIAL ACTION PLAN
 FORMER AMERICAN BERYLLIUM COMPANY
 TALLEYVA ST, FLORIDA

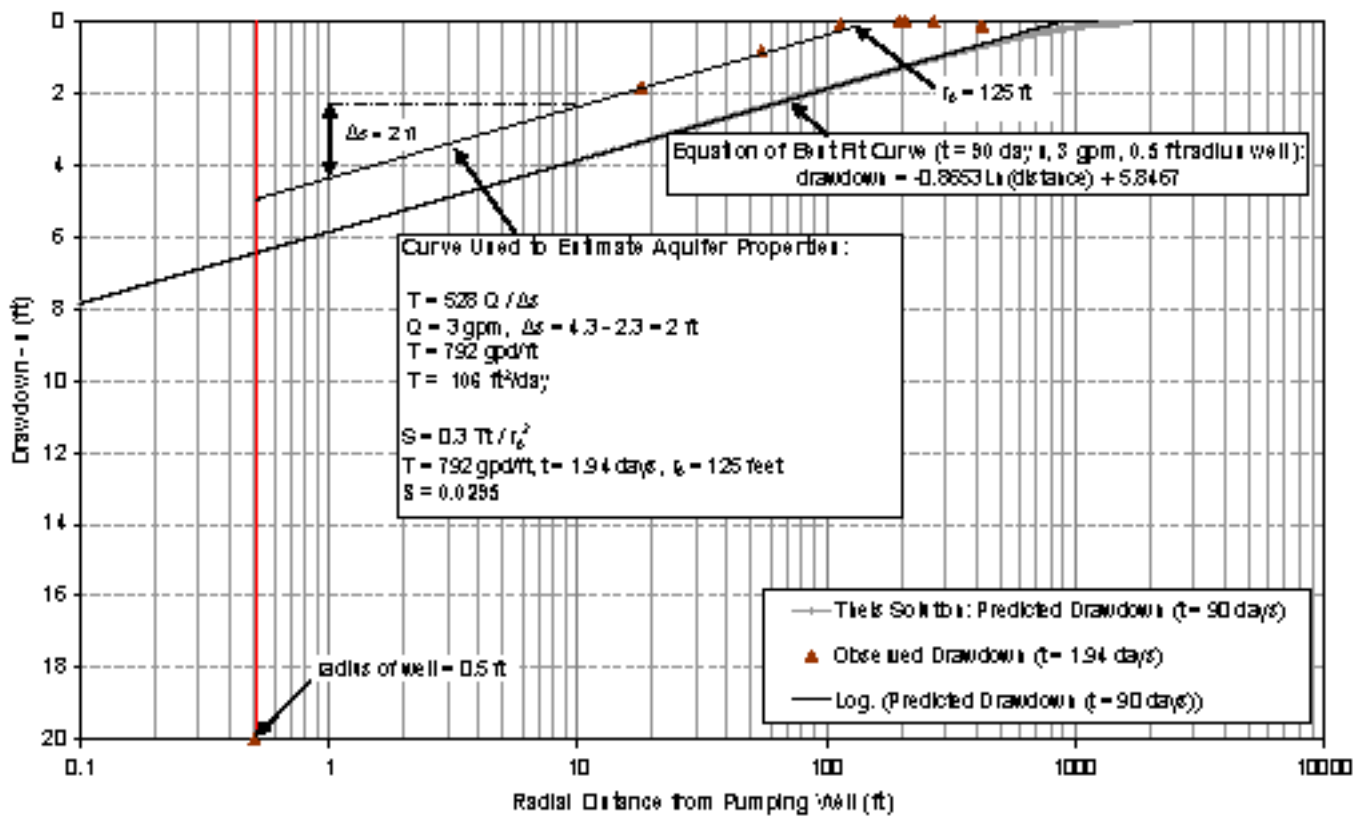
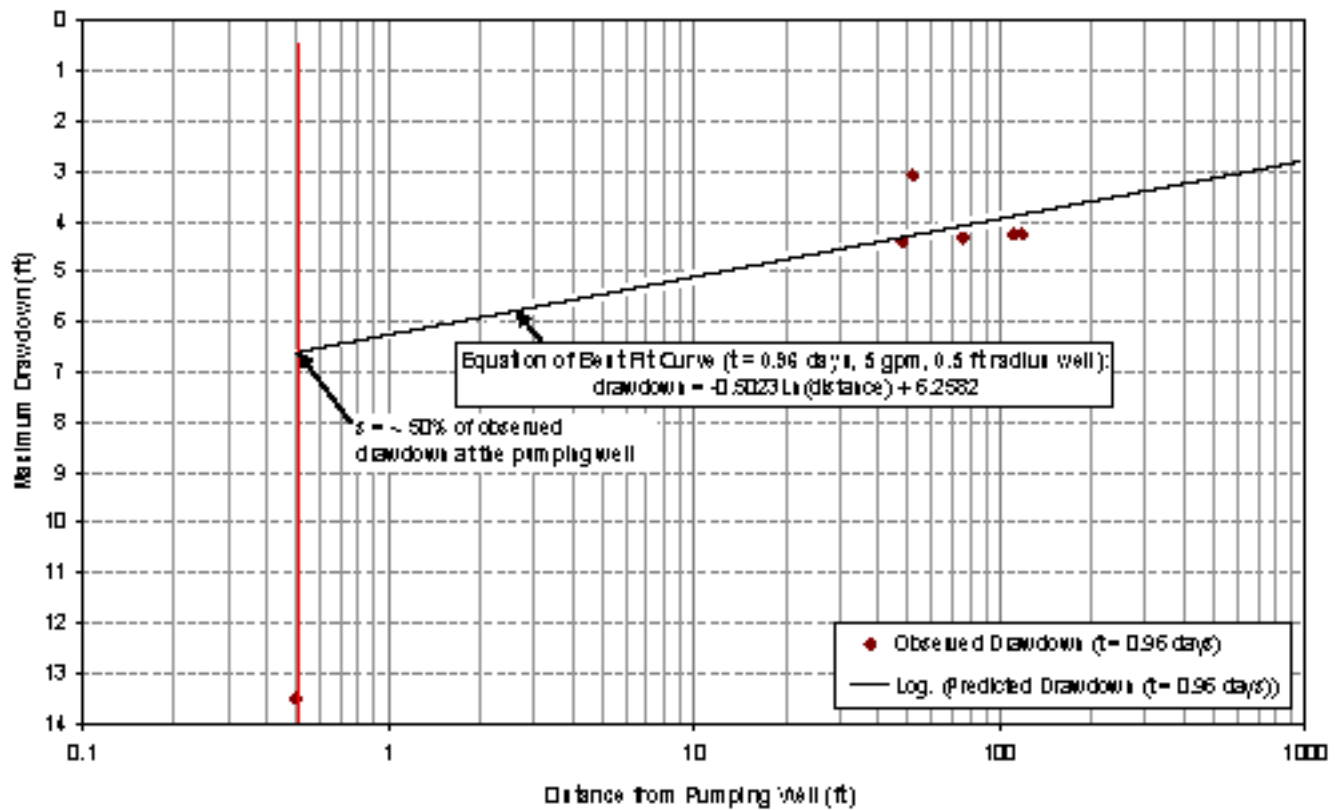


FIGURE B-4
 DISTANCE-DRAWDOWN DATA: LSA'S PUMPING TEST

INTERIM REMEDIAL ACTION PLAN
 FORMER AMERICAN BERYLLIUM COMPANY
 TALLEHAST, FLORIDA

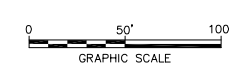




LEGEND:

- SITE BOUNDARY
- ++++ RAILROAD TRACKS
- x-x- FENCE
- MW-79 MONITORING WELL
- ⊙ B CONCEPTUAL GROUNDWATER EXTRACTION WELL LOCATION IN UPPER SURFICIAL AQUIFER
- - - - PRELIMINARY ESTIMATE OF CAPTURE ZONE (PUMPING RATE ASSUMED TO BE 3gpm PER EXTRACTION WELL; TOTAL Q=12gpm)

- NOTE:**
1. CAPTURE ZONE SHOWN HERE IS A PRELIMINARY ESTIMATE BASED ON THE EXTRAPOLATION OF THE USAS PUMPING TEST DATA OUT TO 90 DAYS.
 2. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



**FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN**

USAS ESTIMATED CAPTURE ZONE




FIGURE
B-5

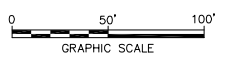
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 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 12/13/05 SYR-85-GMS
 38037001/38037B06.DWG



LEGEND:

- SITE BOUNDARY
- ++++ RAILROAD TRACKS
- x-x- FENCE
- MW-79 MONITORING WELL
- ⊙ B CONCEPTUAL GROUNDWATER EXTRACTION WELL LOCATION IN LOWER SURFICIAL AQUIFER
- - - - PRELIMINARY ESTIMATE OF CAPTURE ZONE (PUMPING RATE ASSUMED TO BE 5gpm PER EXTRACTION WELL; TOTAL Q=10gpm)

- NOTE:**
1. ACTUAL CAPTURE ZONE IS ANTICIPATED TO BE LARGER THAN SHOWN HERE SINCE THE INTERIM RAP WILL INCLUDE PUMPING FROM 4 WELLS (LOCATIONS OF C AND D TO BE DETERMINED UPON RECEIPT OF ADDITIONAL INFORMATION).
 2. BASE MAP INFORMATION OBTAINED FROM A TETRA TECH, INC. FIGURE 2-8 ENTITLED "TCE IN SURFICIAL AQUIFER SYSTEM BASED ON SCREEN POINT SAMPLING AT THE BASE OF THE SURFICIAL AQUIFER" DATED 10/5/04, AT A SCALE OF 1"=280'.



**FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA
INTERIM REMEDIAL ACTION PLAN**

LSAS ESTIMATED CAPTURE ZONE

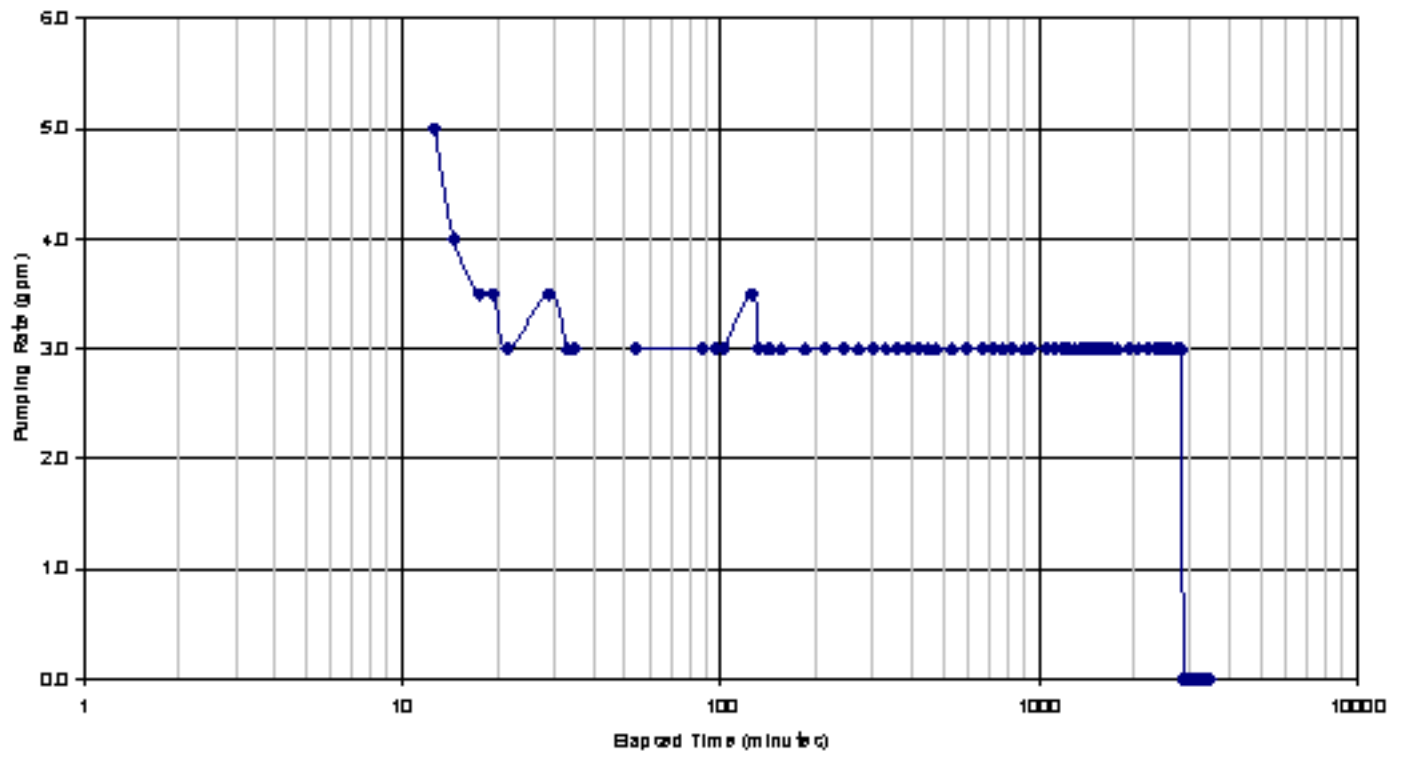
FIGURE
B-6

X: 38037X00.DWG, 38037X01.BMP
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/13/05 SYR-85-GMS
38037001/38037B07.DWG

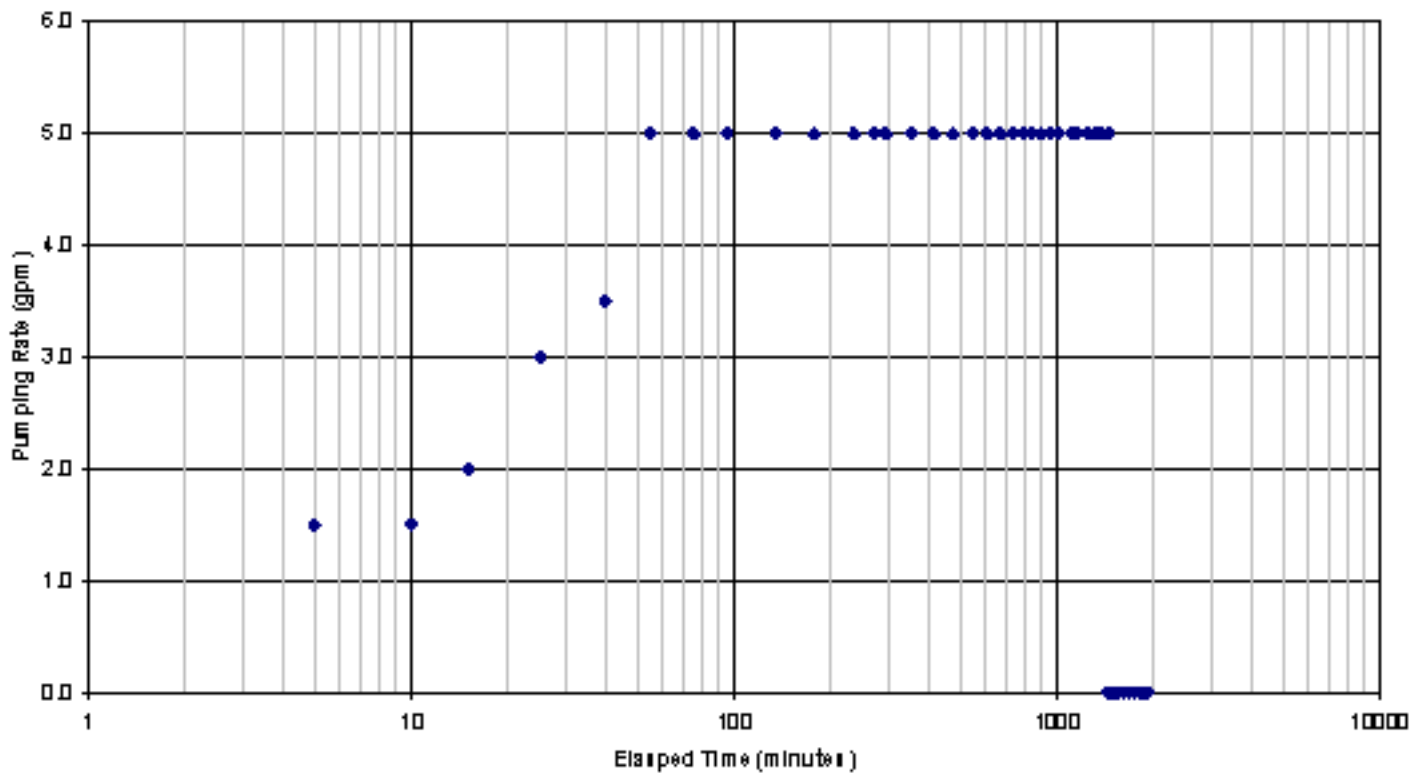
Attachment

Pumping Test Data

USAS PUMPING TEST: PUMPING RATE
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVA ST, FLORIDA

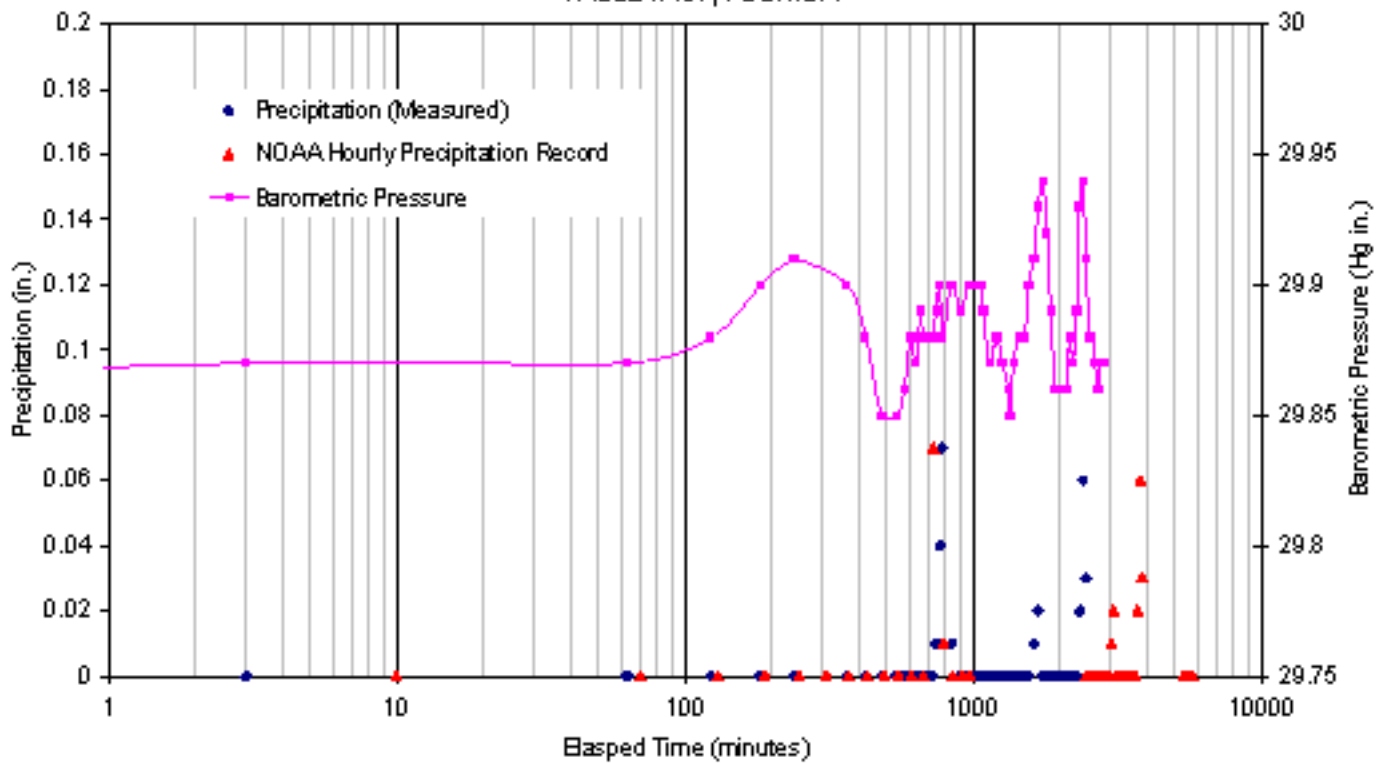


LSAS PUMPING TEST: PUMPING RATE
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVAST, FLORIDA



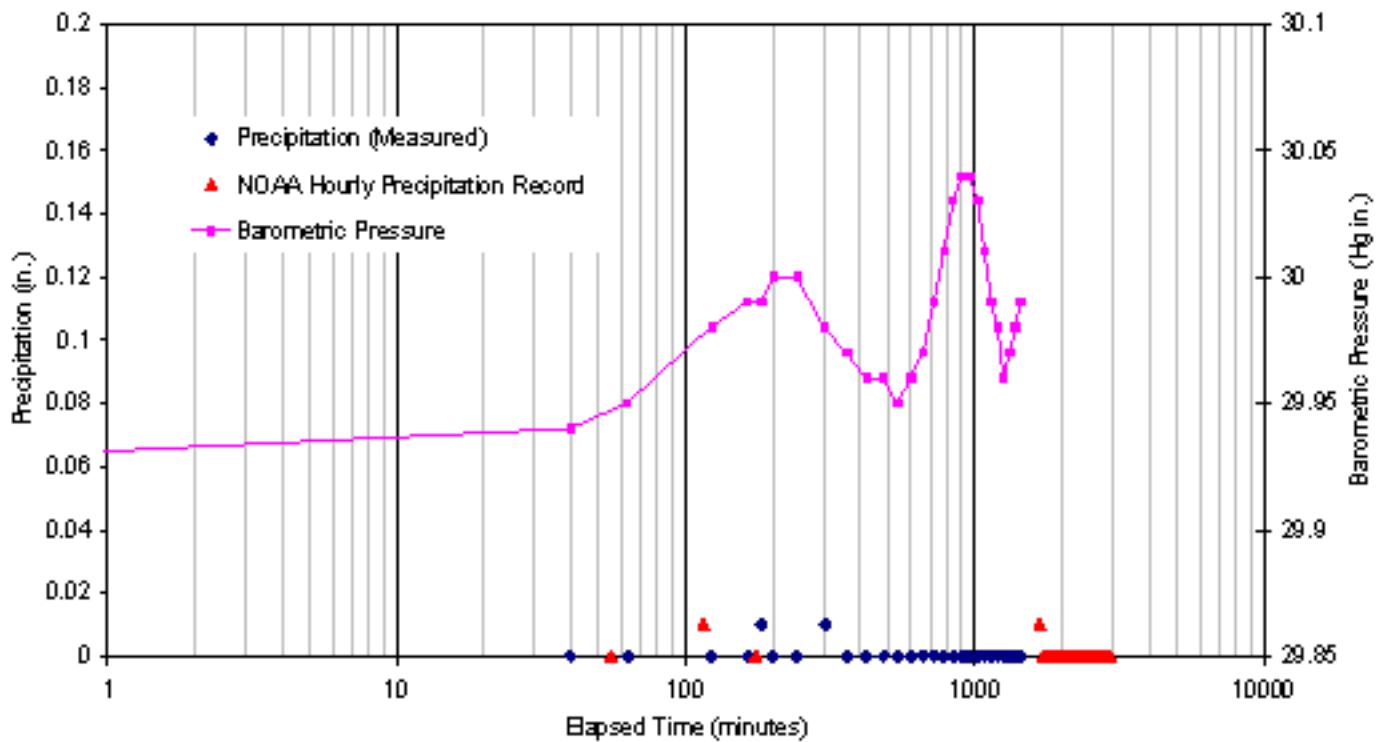
USAS PUMPING TEST
BAROMETRIC PRESSURE AND PRECIPITATION

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYVAST, FLORIDA



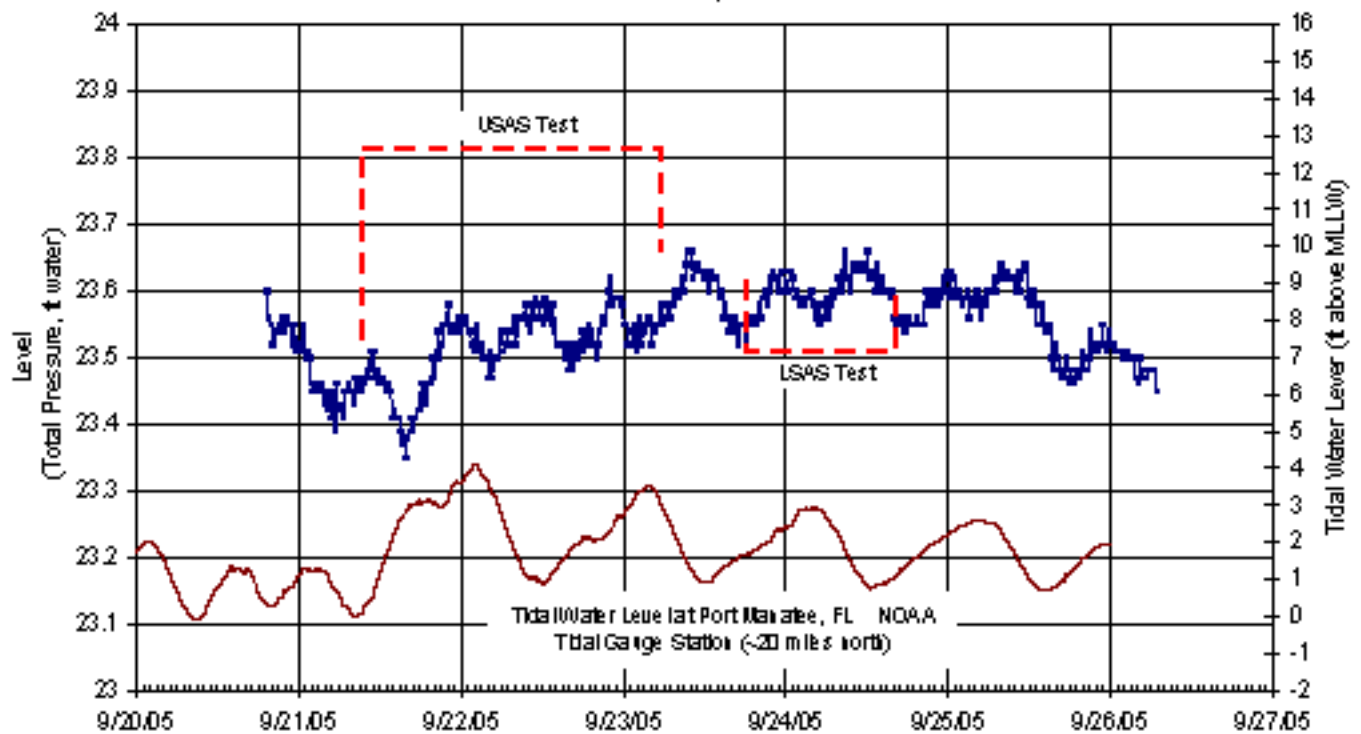
LSA S PUMPING TEST
BAROMETRIC PRESSURE AND PRECIPITATION

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVA ST, FLORIDA



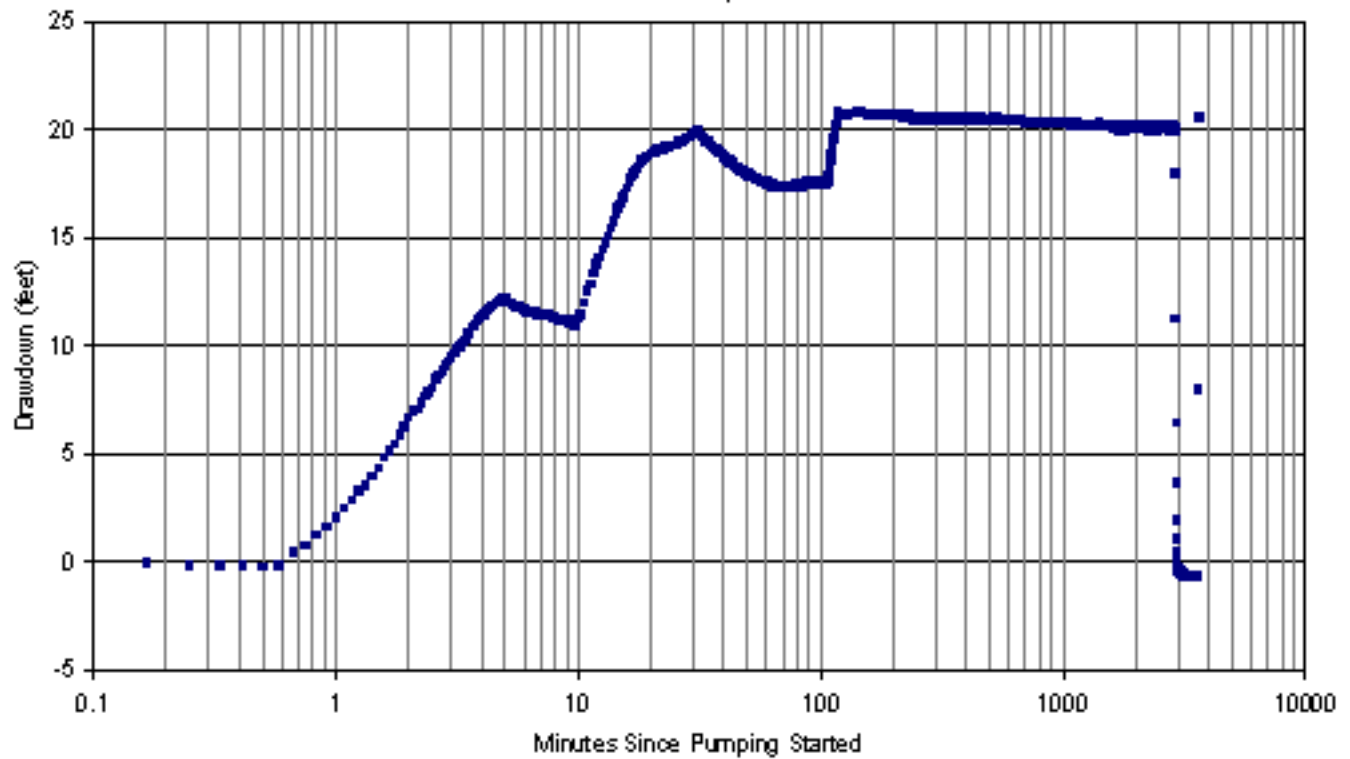
USAS AND LSAS PUMPING TESTS
USAS MW-72 (BACKGROUND WELL): LEVEL LOGGER DATA

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA

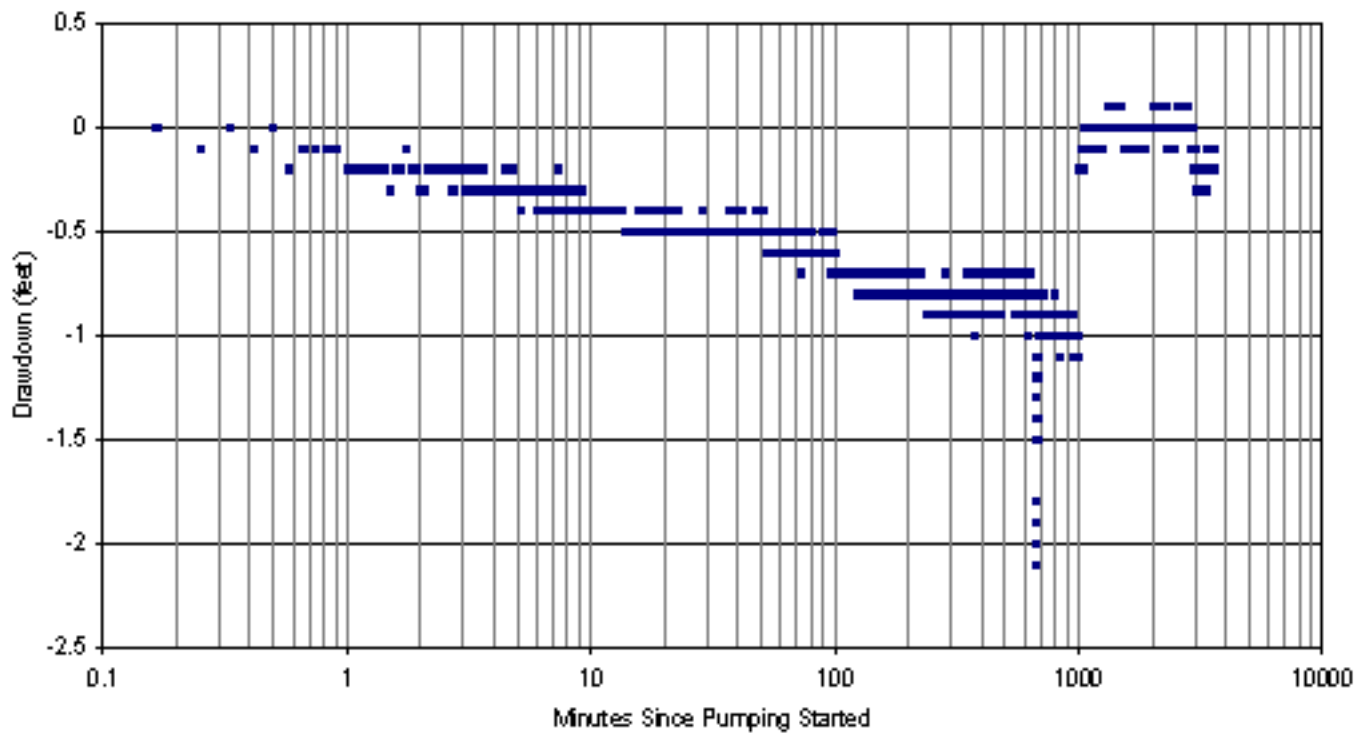


USAS PUMPING TEST
PUMPING WELL (EXU-1): LEVEL LOGGER DATA

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYVAST, FLORIDA

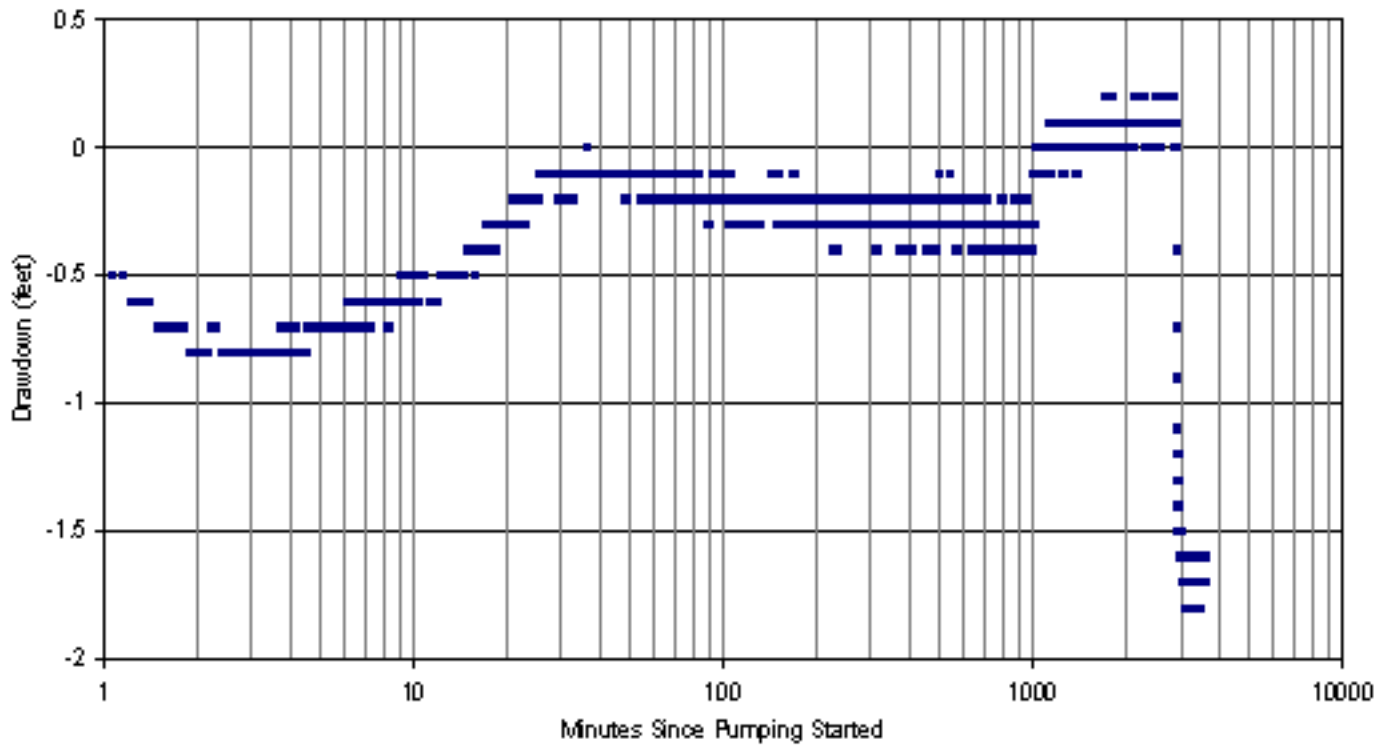


USA S PUMPING TEST
USA S MW-32: LEVEL LOGGER DATA
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA

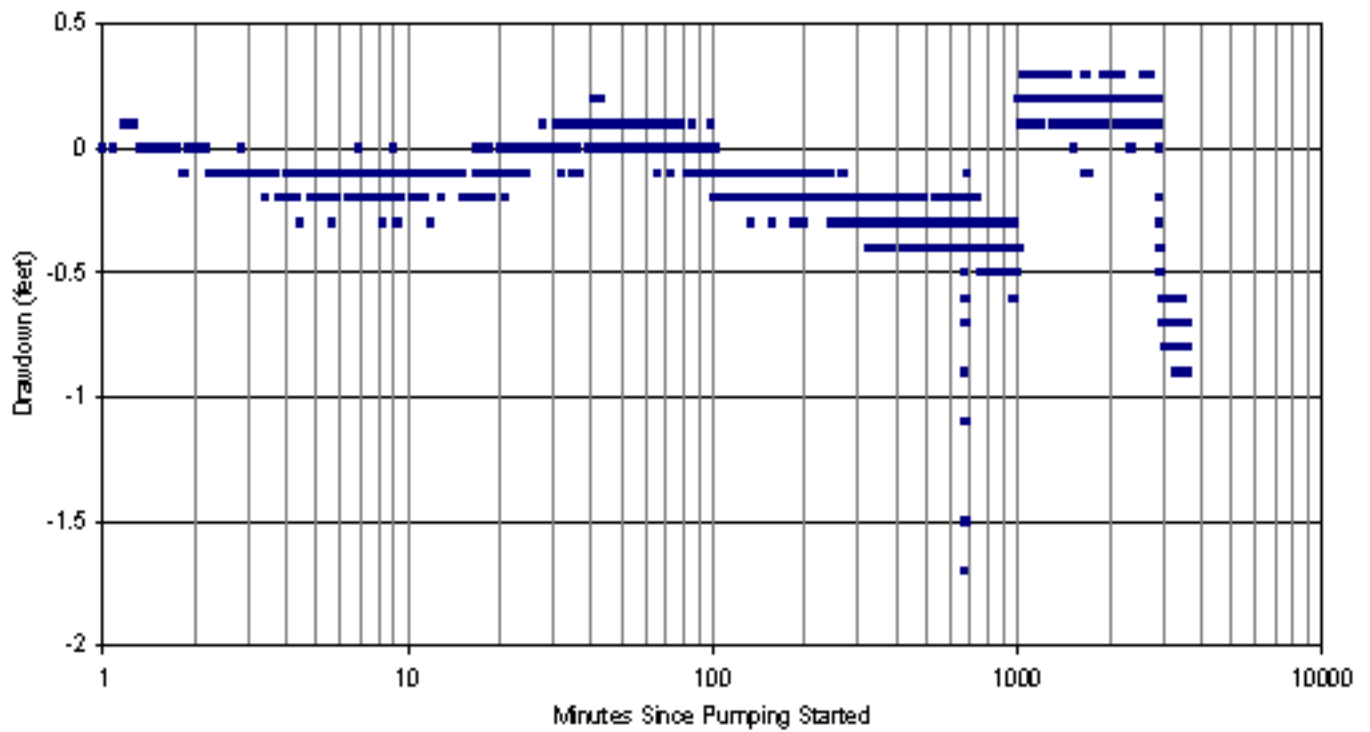


USAS PUMPING TEST
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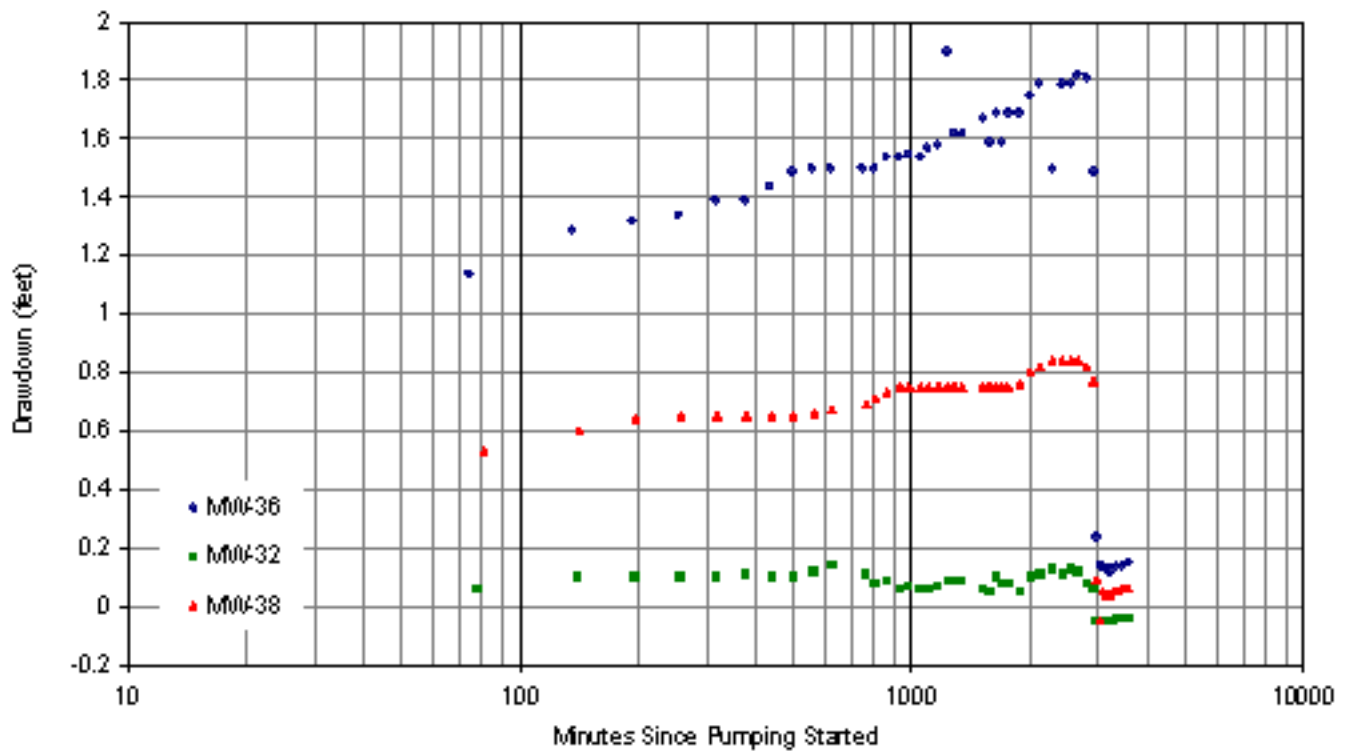
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA



USA S PUMPING TEST
USA S MW-38: LEVEL LOGGER DATA
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA

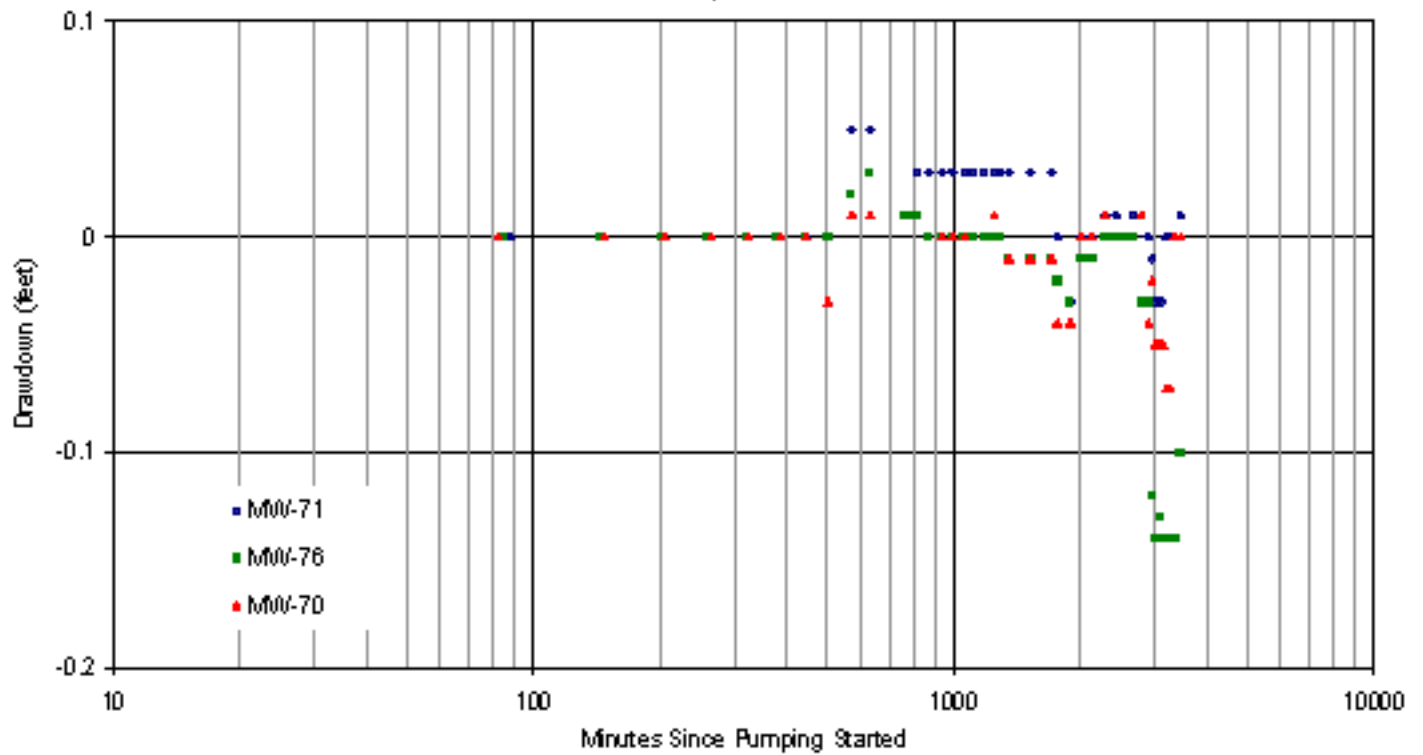


USAS PUMPING TEST
USAS WELLS (CLOSE): MANUALLY GAUGED LEVELS
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVA ST, FLORIDA



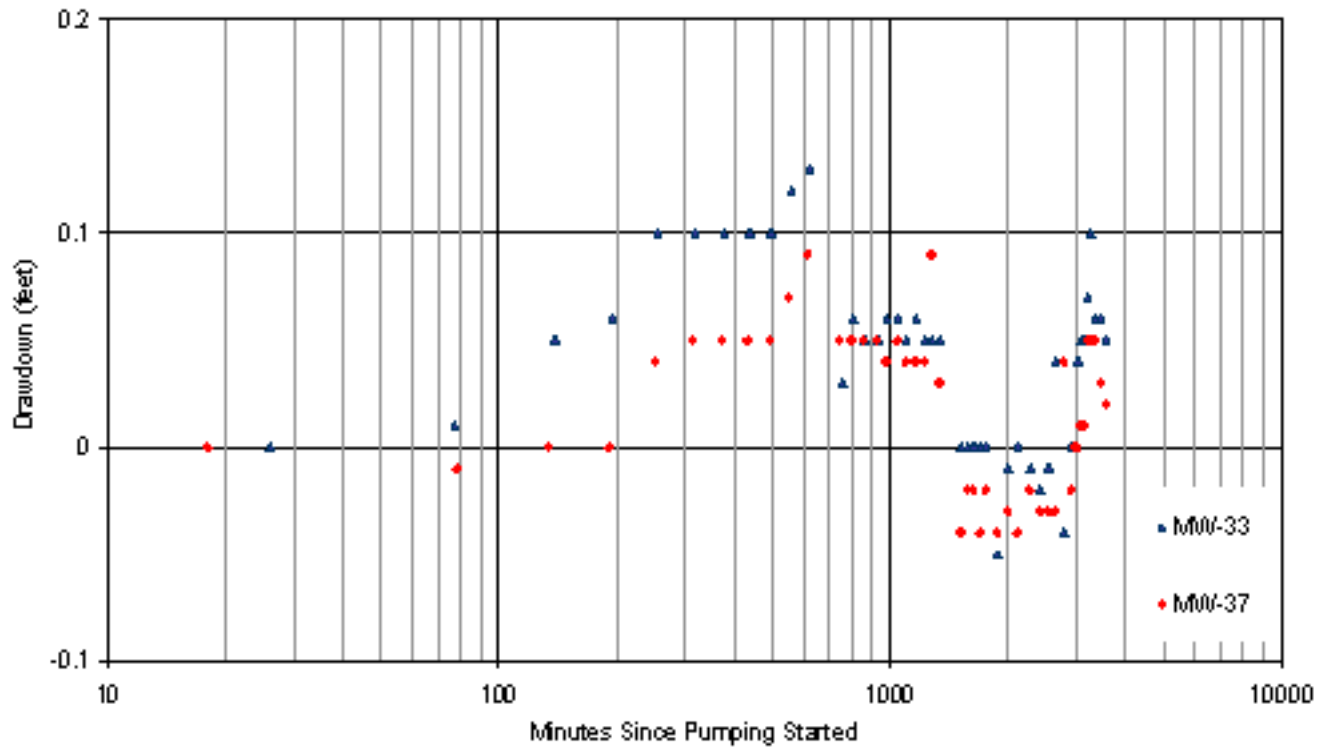
USAS PUMPING TEST
USAS WELLS (DISTANT): MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYVAST, FLORIDA



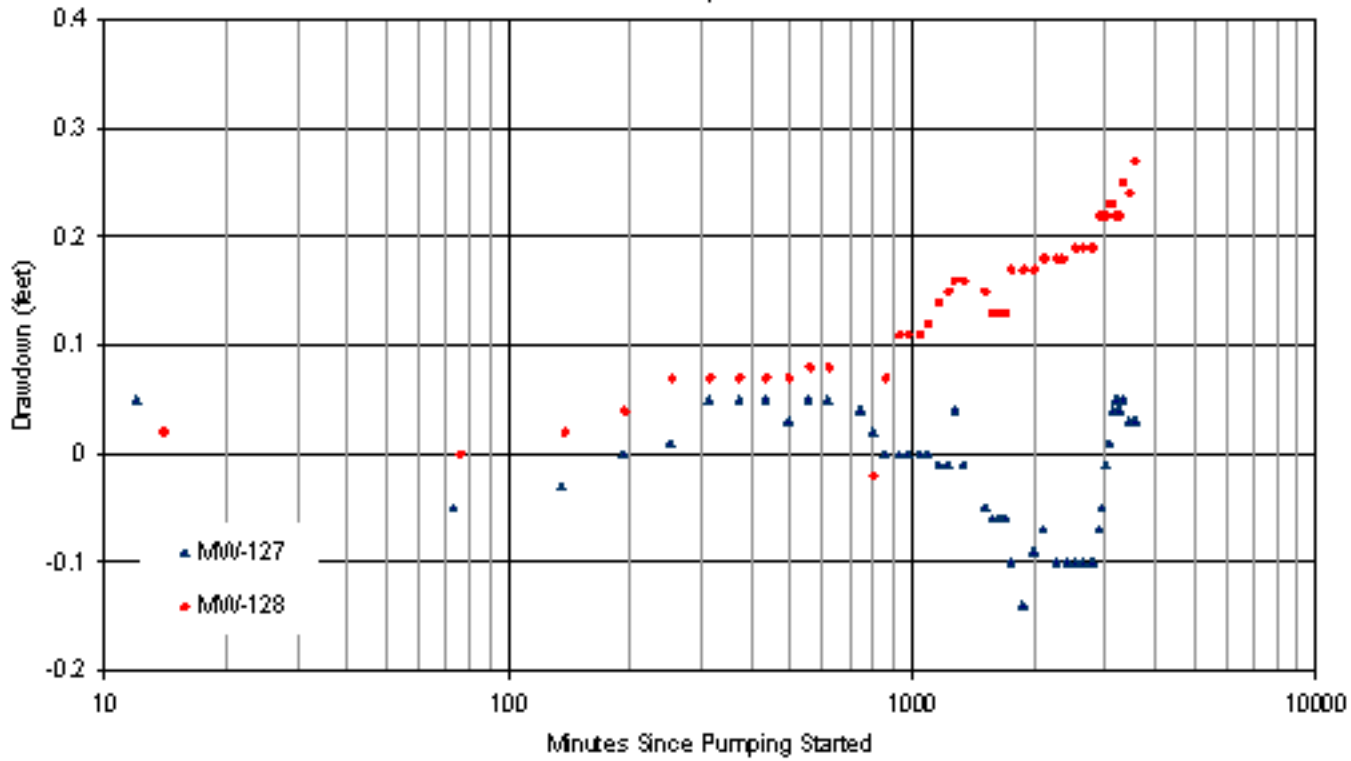
USAS PUMPING TEST
LSAS WELLS: MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYVAST, FLORIDA



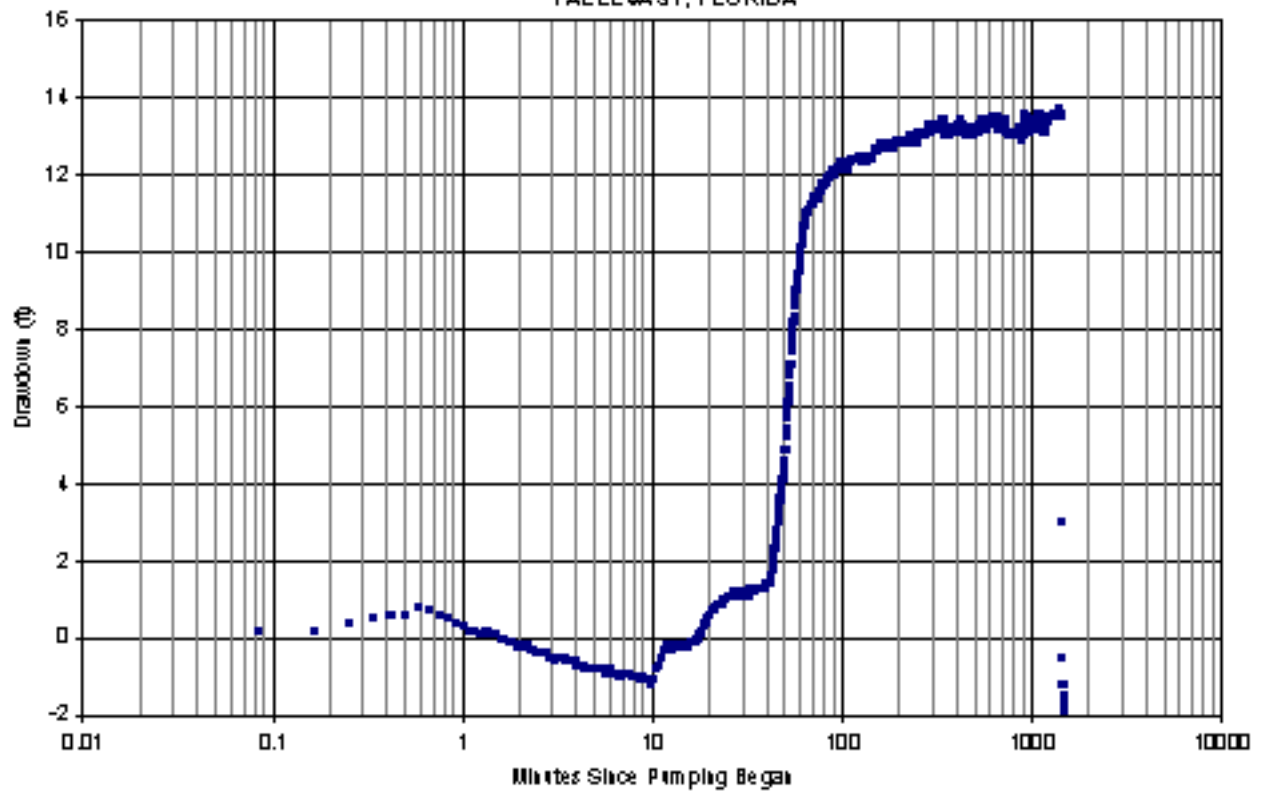
USAS PUMPING TEST
IAS WELLS: MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYAST, FLORIDA

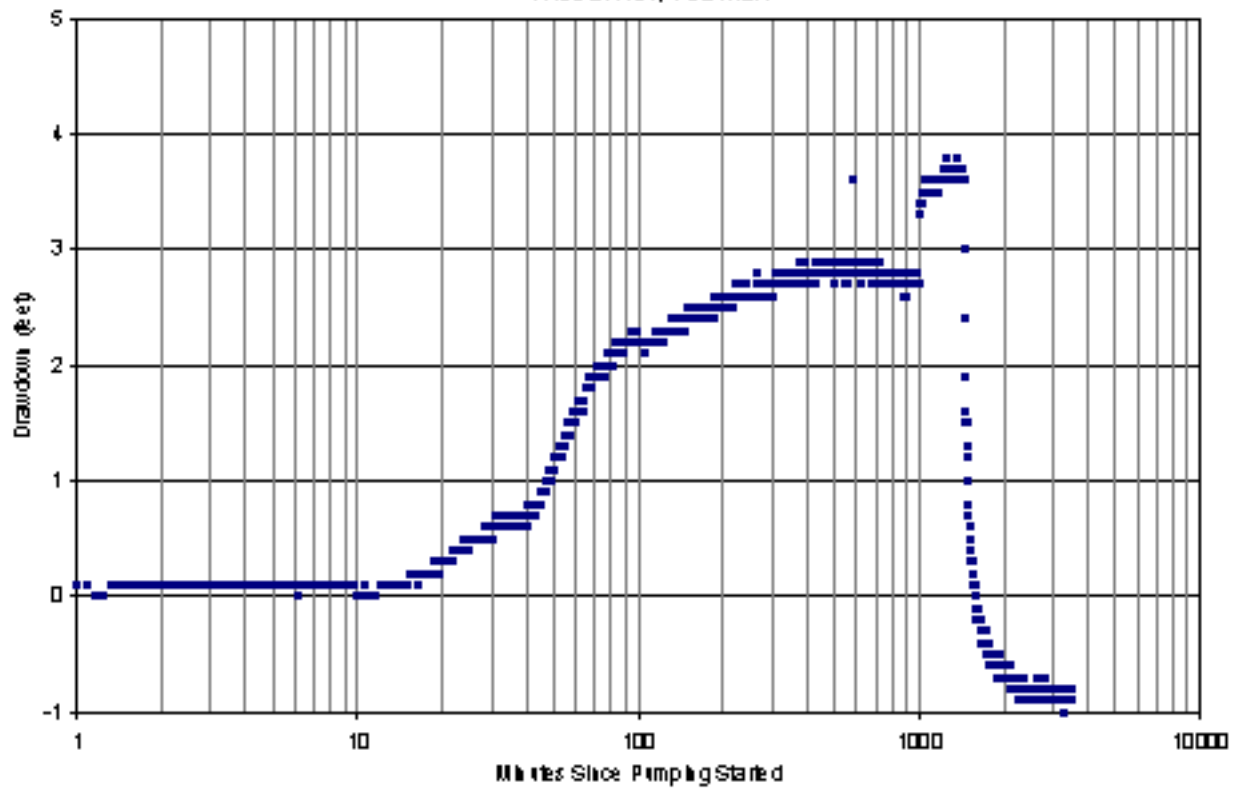


LSAS PUMPING TEST
PUMPING WELL (EXL-1): LEVEL LOGGER DATA

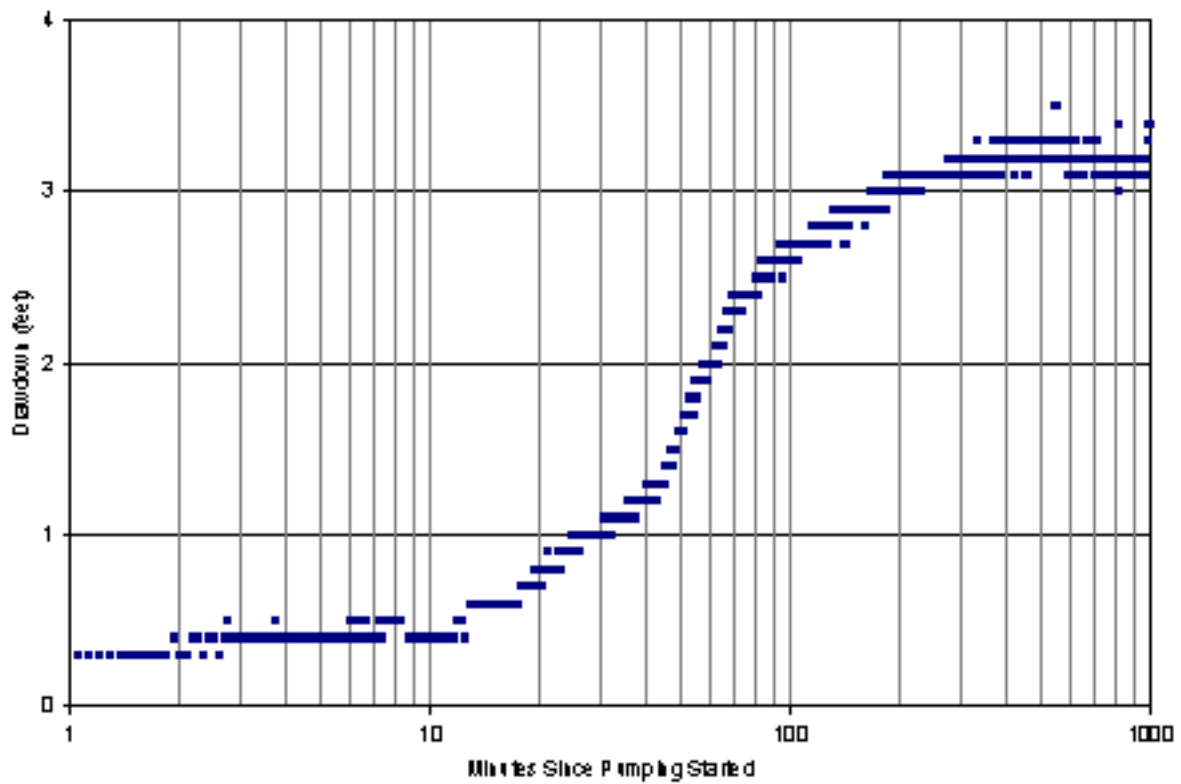
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA



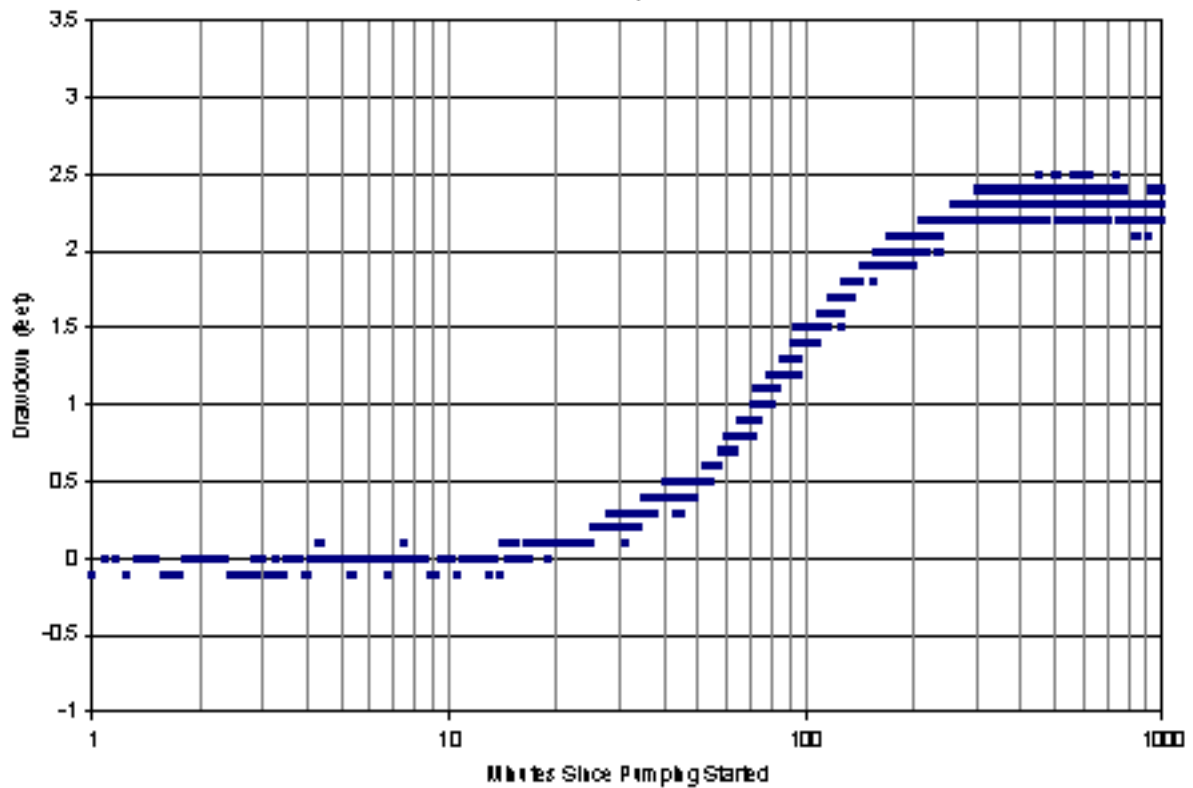
LSAS PUMPING TEST
LSAS MVA-33: LEVEL LOGG ER DATA
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA



LSAS PUMPING TEST
LSAS M/A-37: LEVEL LOGGER DATA
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA

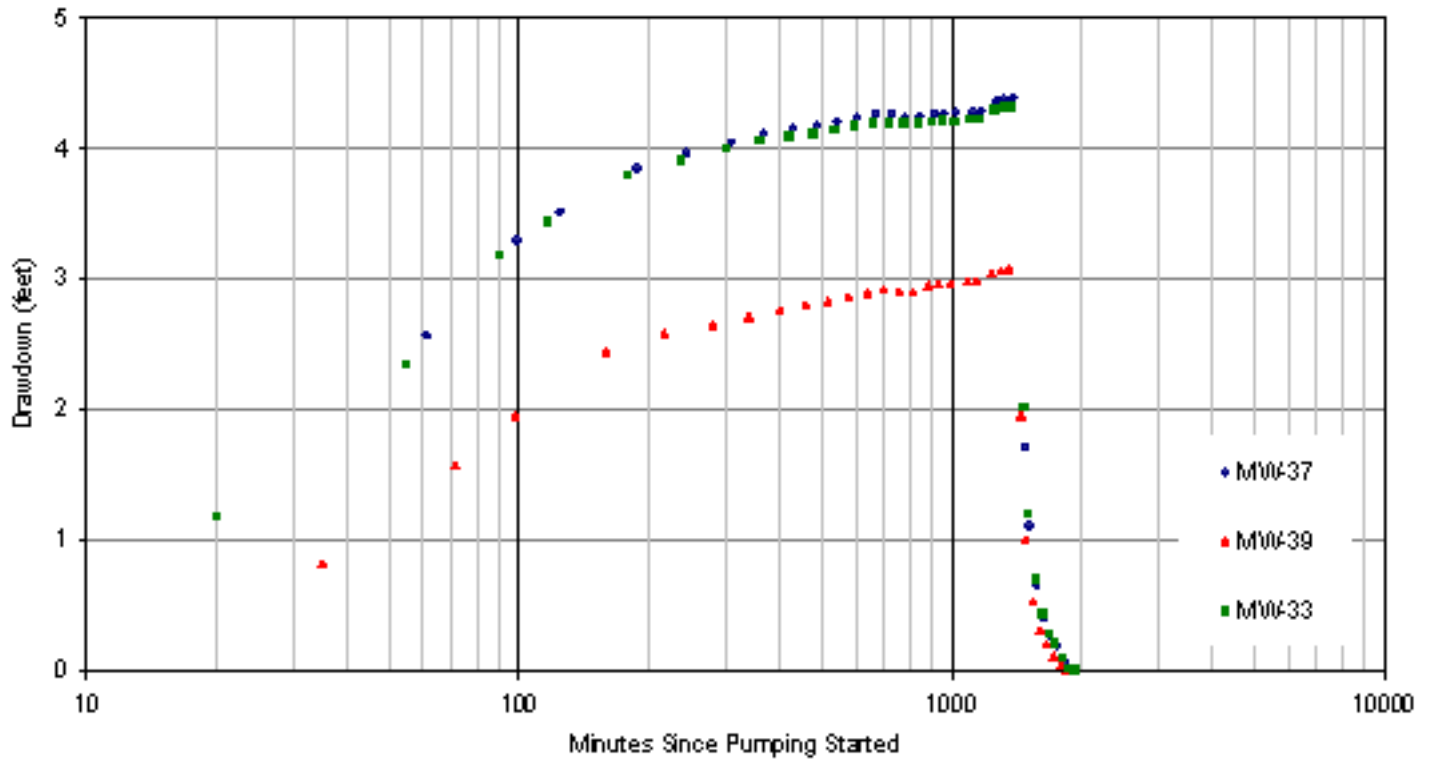


LSAS PUMPING TEST
LSAS MASS: LEVEL LOGGER DATA
INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEHAST, FLORIDA



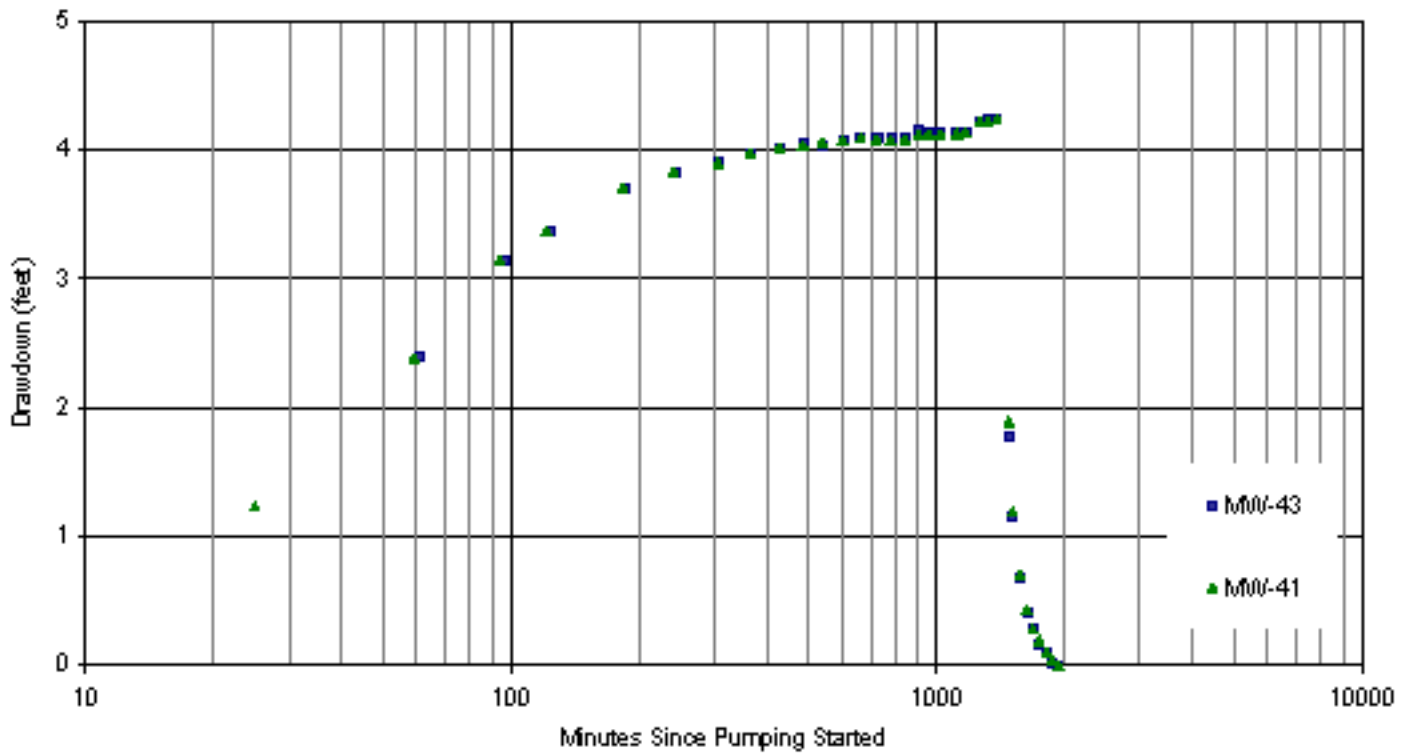
LSAS PUMPING TEST
LSAS WELLS (CLOSE): MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEYVAST, FLORIDA



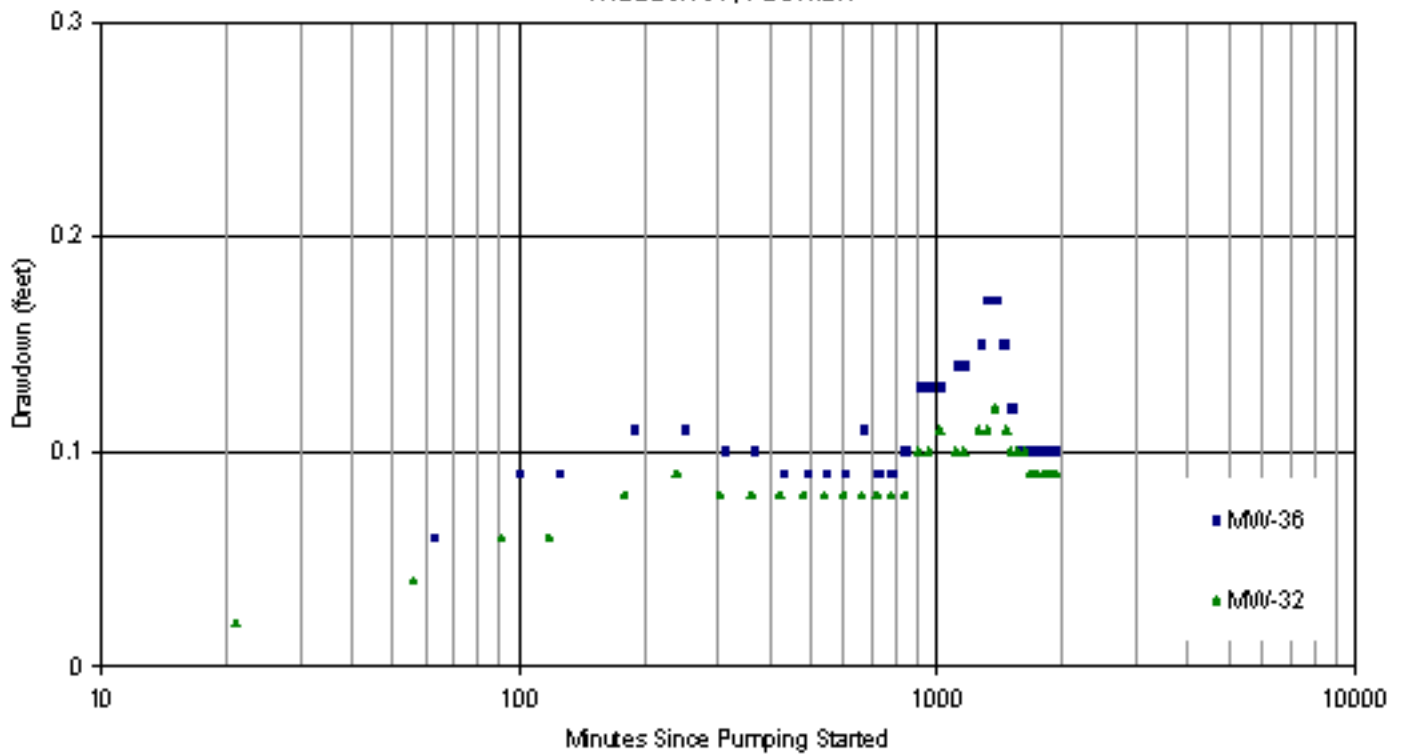
LSAS PUMPING TEST
LSAS WELLS (DISTANT): MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVA ST, FLORIDA



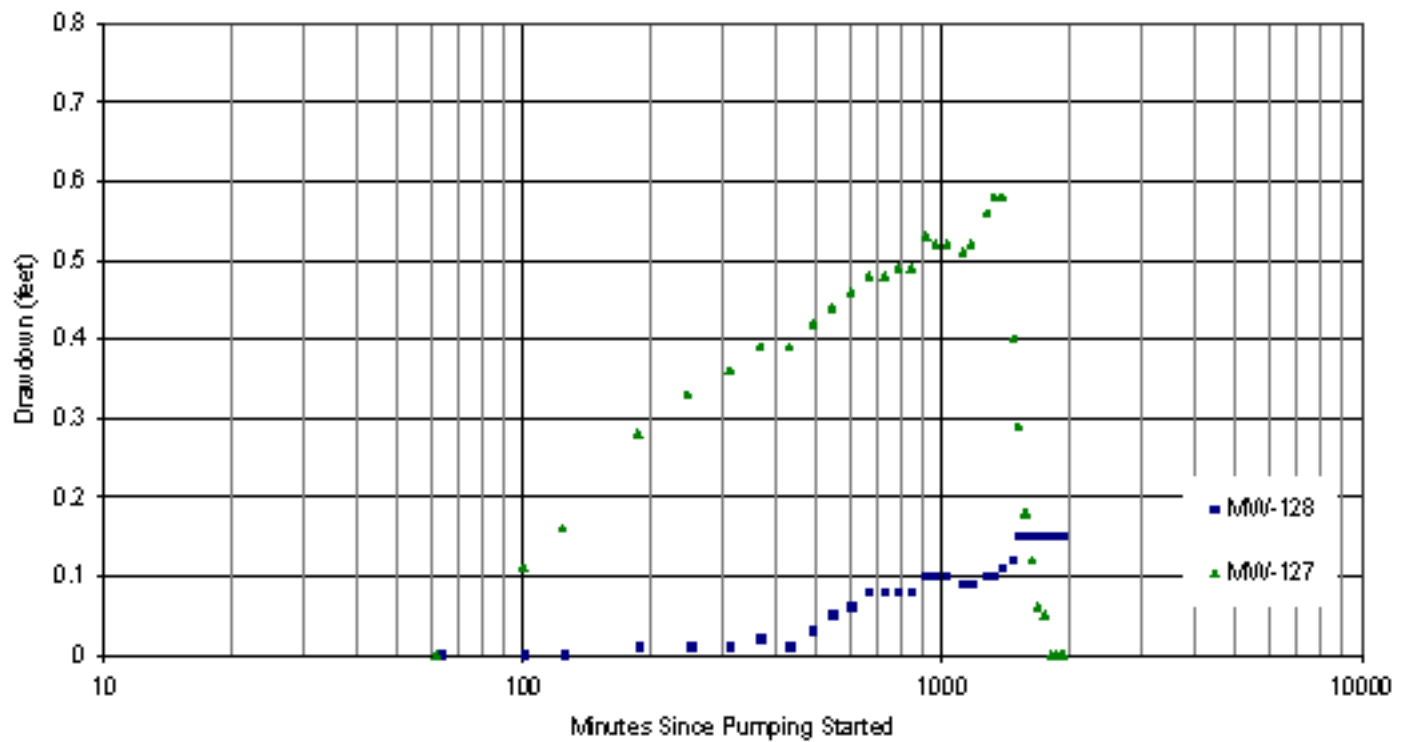
LSAS PUMPING TEST
USAS WELLS: MANUALLY GAUGED LEVELS

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TALLEVA ST, FLORIDA



LSA'S PUMPING TEST
W S WELLS: MANUALLY GAUGED LEVELS

INTERIM REMEDIAL ACTION PLAN
FORMER AMERICAN BERYLLIUM COMPANY
TALLEVAST, FLORIDA



Appendix C

Pilot Test Data



KB LABS, INC.
6821 Southwest Archer Road
Gainesville, Florida 32608
Telephone (352) 367-0073
Fax (352) 367-0074
Email: info@kbmobilelabs.com

October 10, 2005

Paul Calligan
TINUS
5421 Beaumont Center Blvd, Suite 660
Tampa, FL 33634

**RE: Former American Beryllium, Tallavast, FL - Final Data Report
KB Labs Project # 05-227**

Dear Mr. Calligan:

Enclosed is the final report of the on-site analysis performed by KB Labs, Inc. at the above referenced site. Samples were collected and analyzed from September 21 to 24, 2005. Included are a brief project narrative, data report narrative, tables listing quality control results, final analytical results, and sample chain-of-custody form. This information will also be sent electronically.

KB Labs' mobile laboratories have been inspected by the FDOH Bureau of Laboratories and are NELAP Certified as of April 1, 2003. Our personnel, methodology, proficiency testing, and quality assurance requirements comply with the guidelines of Chapter 62-160 of the Florida Administrative Code and with the consensus standards adopted at the National Environmental Laboratory Accreditation Conference (NELAC). Data for the site referenced above were determined in accordance with published procedures under Test Methods for Evaluating Solid Waste (EPA SW-846, Update III Revised May 1997). Unless otherwise indicated on the quality control narrative accompanying the data report, the quality assurance and quality control procedures performed in conjunction with analysis of groundwater samples demonstrated that the reported data met our requirements for accuracy and precision under NELAC Standards.

If you have any questions, please do not hesitate to call me or Kelly Bergdoll, President of KB Labs, at (352) 367-0073.

Sincerely,

KB Labs, Inc.

Todd Romero
Director of Operations

"KB Labs is a small, woman-owned business enterprise."



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PROJECT NARRATIVE

Project Scope

From September 21 to 24, 2005, a total of 23 samples (23 water) were analyzed for TtNUS at Former American Beryllium, Tallahassee, FL. The samples were analyzed for vinyl chloride, 1,1-dichloroethene, cis- and trans-1, 2-dichloroethene, trichloroethene, tetrachloroethene, benzene, toluene, ethylbenzene, xylenes, and 1,4-dioxane.

NELAP Certification

KB Mobile Labs Unit KB1: FDOH NELAP Certification Number E82815

Analytical Procedure

All samples were analyzed using SW846 Method 5030/8260 for waters. Ten (10) milliliters (mL) of water or air (air samples) were purged with helium and the volatile organic compounds (VOCs) were collected on a solid-phase adsorption trap. The adsorption trap was heated and back-purged with helium. The components were then separated by capillary column gas chromatography and measured with a mass spectrometer (GC/MS) operated in the electron impact full-scan mode. The individual VOCs in the samples were measured against corresponding VOC standards.

Analytical Results

Laboratory results were provided to the client on an as-completed or next-day basis. Final results of the on-site analyses are provided in a hardcopy report. The data produced and reported in the field has been reviewed and approved for this final report by the Director of Operations for KB Labs.

Quality Control (QC) Data

Surrogate Recoveries – Table 1 lists the daily analytical sequence and percent recovery results for surrogate compounds, which were added to all analyses. Four (4) surrogate compounds were added to each analysis in order to continually monitor general method performance.

VOC Spike Recoveries – Table 2 lists the percent recovery results for matrix spike and laboratory control samples. A known amount of each target compound was added to selected field samples and to laboratory reagent water in order to monitor the performance of each of the target compounds in the actual matrix and in laboratory reagent water.

"KB Labs is a small, women-owned business enterprise."



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Method Blanks – Daily analysis of laboratory reagent water samples was performed in order to monitor the cleanliness of the analytical system.

DATA REPORT NARRATIVE

1. All sample data has been reviewed and, if required, updated in the Final Data Report for rounding and significant figures.
2. The trichloroethene result for sample **EXU-1-No.Tank -1700** was updated from 17000 ug/L to 12000 ug/L.
3. The 1,4-Dioxane results were masked for samples collected from 9/21/05 to 9/23/05 that contained high concentrations of trichloroethene. Results were estimated by comparing compound area counts with the initial calibration curve. Data was flagged with FDEP Data Qualifier "J".

KB LABS, INC.

Table 1: Analytical Run Sequence/Surrogate Percent Recoveries

Client: TINUS	Driller/Sampler: Purifico	Analyst: Enoch
Site: Former American Beryllium	KB Labs Project Manager: Kelly Bergdoll	KB Labs Project No: 05-227
On-site Dates: 09/21/05-09/24/05	Client Project Manager: Paul Calligan	Matrix: Water

Sample ID	Date of Analysis	Surrogate % Recovery				Surrogate Control Limits			
		S1*	S2*	S3*	S4*	S1*	S2*	S3*	S4*
BLANK WATER DIOX	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 2	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 10	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 20	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 40	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 100	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 200	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER DIOX	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER	09/21/05	102	97	100	98	Pass	Pass	Pass	Pass
DIOX 40	09/21/05	NA	NA	NA	NA	> UCL	> UCL	> UCL	> UCL
VSTD 20	09/21/05	110	93	102	101	Pass	Pass	Pass	Pass
RSTD 20	09/21/05	121	104	98	97	Pass	Pass	Pass	Pass
EXU-1-INF-735	09/21/05	116	104	98	104	Pass	Pass	Pass	Pass
EXU-1-INF-735 DIOX	09/21/05	NA	NA	NA	NA	> UCL	> UCL	> UCL	> UCL
EXU-1-INF-735 1:10	09/21/05	119	105	94	106	Pass	Pass	Pass	Pass
EXU-1-INF-1315	09/21/05	131	110	93	109	Pass	Pass	Pass	Pass
BLANK WATER DIOX	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1435	09/21/05	132	110	95	108	Pass	Pass	Pass	Pass
EXU-1-INF-1315 1:100	09/21/05	126	105	94	102	Pass	Pass	Pass	Pass
EXU-1-EFF-1435 DIOX	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1635 DIOX	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1635	09/21/05	118	105	107	100	Pass	Pass	Pass	Pass
VSTD 10	09/21/05	127	107	98	106	Pass	Pass	Pass	Pass
DIOX 20	09/21/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER	09/22/05	103	100	103	109	Pass	Pass	Pass	Pass
VSTD 20	09/22/05	105	104	93	98	Pass	Pass	Pass	Pass
RSTD 20	09/22/05	112	102	103	100	Pass	Pass	Pass	Pass
BLANK WATER DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 40	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1015 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1215 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1215 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1215	09/22/05	114	102	101	100	Pass	Pass	Pass	Pass
EXU-1-INF-1215 1:100	09/22/05	112	105	97	104	Pass	Pass	Pass	Pass
EXU-1-No Tank-1700 1:1000	09/22/05	98	85	98	99	Pass	< LCL	Pass	Pass
EXU-1-INF-1702 1:100	09/22/05	114	102	95	109	Pass	Pass	Pass	Pass
EXU-1-EFF-1704	09/22/05	119	106	98	107	Pass	Pass	Pass	Pass
EXU-1-EFF-1704MS	09/22/05	125	108	83	104	Pass	Pass	< LCL	Pass

***Surrogate Compounds:**

- S1 = 1,2-Dichloroethane-D4 (73% - 143%)
- S2 = 1,2-Difluorobenzene (78% - 127%)
- S3 = Toluene-D8 (84% - 117%)
- S4 = 4-Bromofluorobenzene (73% - 127%)

KB LABS, INC.

Table 1: Analytical Run Sequence/Surrogate Percent Recoveries

Client: TUNUS	Driller/Sampler: Purifics	Analyst: Enoch
Site: Former American Beryllium	KB Labs Project Manager: Kelly Bergdoll	KB Labs Project No: 05-227
On-site Dates: 09/21/05-09/24/05	Client Project Manager: Paul Culligan	Matrix: Water

Sample ID	Date of Analysis	Surrogate % Recovery				Surrogate Control Limits			
		S1*	S2*	S3*	S4*	S1*	S2*	S3*	S4*
EXU-1-EFF-1704MSD	09/22/05	91	107	99	97	Pass	Pass	Pass	Pass
EXU-1-NO TANK-1700 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-INF-1702 1:100 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1704 DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1704MS DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1704MSD DIOX	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-NO TANK-1700 1:200	09/22/05	123	105	99	104	Pass	Pass	Pass	Pass
VSTD 10	09/22/05	125	105	95	109	Pass	Pass	Pass	Pass
DIOX 20	09/22/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER	09/23/05	105	100	104	129	Pass	Pass	Pass	> UCL
VSTD 20	09/23/05	109	86	97	105	Pass	Pass	Pass	Pass
RSTD 20	09/23/05	113	101	102	101	Pass	Pass	Pass	Pass
BLANK WATER DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 40	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-NO TANK 0650 1:100	09/23/05	91	97	94	105	Pass	Pass	Pass	Pass
EXU-1-EFF 1030	09/23/05	121	104	96	107	Pass	Pass	Pass	Pass
EXU-1-INF-1030 1:100	09/23/05	118	100	97	101	Pass	Pass	Pass	Pass
EXU-1-NO TANK 0650 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1030 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-INF-1030 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-NO TANK 0650 1:200	09/23/05	112	108	92	106	Pass	Pass	Pass	Pass
EXU-1-NO TANK 0650 1:10 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-INF-1400 1:200	09/23/05	122	100	94	104	Pass	Pass	Pass	Pass
EXU-1-EFF-1402	09/23/05	122	104	90	106	Pass	Pass	Pass	Pass
EXU-1-EFF-1402 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-INF-1400 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1540 DIOX	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
EXU-1-EFF-1540	09/23/05	126	108	91	105	Pass	Pass	Pass	Pass
VSTD 10	09/23/05	125	104	93	102	Pass	Pass	Pass	Pass
DIOX 20	09/23/05	NA	NA	NA	NA	NA	NA	NA	NA
BLANK WATER	09/24/05	105	98	103	107	Pass	Pass	Pass	Pass
VSTD 20	09/24/05	109	104	98	100	Pass	Pass	Pass	Pass
BLANK WATER DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
DIOX 40	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-No Tank-0700 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1 TANK-0700 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-NO TANK 0700	09/24/05	124	111	91	103	Pass	Pass	Pass	Pass

Surrogate Compounds:

S1 = 1,2-Difluorobenzene (63% - 146%)

S2 = 1,2-Difluorobenzene (79% - 120%)

S3 = Toluene-D8 (84% - 117%)

S4 = 4-Bromofluorobenzene (73% - 127%)

KB LABS, INC.

Table 1: Analytical Run Sequence/Surrogate Percent Recoveries

Client: TINUS	Driller/Sampler: Purifics	Analyst: Enoch
Site: Former American Beryllium	KB Labs Project Manager: Kelly Bergdoll	KB Labs Project No: 05-227
On-site Dates: 09/21/05-09/24/05	Client Project Manager: Paul Calligan	Matrix: Water

Sample ID	Date of Analysis	Surrogate % Recovery				Surrogate Control Limits			
		S1*	S2*	S3*	S4*	S1*	S2*	S3*	S4*
EXL-1-TANK-0700 1:100	09/24/05	123	106	90	100	Pass	Pass	Pass	Pass
Exl-1-No Tank-0700 1:50 Diox	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-INF-1000	09/24/05	124	109	94	104	Pass	Pass	Pass	Pass
EXL-1-INF-1000 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-EFF-1000 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-NO TANK-0700 1:10	09/24/05	128	109	92	104	Pass	Pass	Pass	Pass
EXL-1-TANK-0700 1:20 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
WXL-1-EFF 1125 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-EFF 1125	09/24/05	128	106	91	105	Pass	Pass	Pass	Pass
EXL-1-EFF-1000	09/24/05	127	106	92	102	Pass	Pass	Pass	Pass
EXL-1-EFF-1000 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-EFF-1400 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
EXL-1-EFF-1400	09/24/05	134	109	90	105	Pass	Pass	Pass	Pass
EXL-1-EFF-1400	09/24/05	134	109	90	105	Pass	Pass	Pass	Pass
EXL-1-INF-1000 1:20 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
LXL-1-INF-1000 1:20	09/24/05	140	106	88	104	Pass	Pass	Pass	Pass
EXL-1-EFF-1600	09/24/05	137	109	95	109	Pass	Pass	Pass	Pass
EXL-1-EFF-1600 DIOX	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
RSTD 20	09/24/05	139	110	94	101	Pass	Pass	Pass	Pass
VSTD 10	09/24/05	137	110	97	100	Pass	Pass	Pass	Pass
DIOX 20	09/24/05	NA	NA	NA	NA	NA	NA	NA	NA
Comments:	Although some surrogates may be out of the control percent recovery range, other supporting QC, such as matrix spikes, matrix spike duplicates, method blanks, and laboratory control samples, are performed by KB Labs to further validate reported data. 14-Dioxane samples are calculated off internal standard and no surrogates are added.								

*Surrogate Compounds:

S1 = 1,2-Dichloroethane-D4 (83% - 146%)

S2 = 1,2-Dibromobenzene (79% - 120%)

S3 = Toluene-D8 (94% - 117%)

S4 = 4-Bromofluorobenzene (79% - 127%)

KB LABS, INC.

Table 2: VOC Spike Compound Percent Recoveries

Client: TiNUS	Driller/Sampler: Purifica	Analyst: Enoch
Site: Former American Beryllium	KB Labs Project Manager: Kelly Bergdoll	KB Labs Project No.: 05-227
Onsite Dates: 09/21/05-09/24/05	Client Project Manager: Paul Calligan	Matrix: Water

Matrix Spike/Matrix Spike Duplicate (MS/MSD):

Samples:	EXU-1-EFF-1704MS EXU-1-EFF-1704MSD	Date of Analysis: 9/22/2005							
Matrix Spike Compounds	Control Limits			Percent Recoveries			Control Limit Checks		
	Lower	Upper	RPD	MS	MSD	RPD	MS	MSD	RPD
Vinyl Chloride	20	187	20	112	93	19	Pass	Pass	Pass
1,1-Dichloroethene	52	144	20	134	67	67	Pass	Pass	> RPD
Trans-1,2-Dichloroethene	41	157	20	113	73	43	Pass	Pass	> RPD
Cis-1,2-Dichloroethene	59	143	20	115	108	5	Pass	Pass	Pass
Benzene	51	149	20	112	108	3	Pass	Pass	Pass
Trichloroethene	50	147	20	118	103	14	Pass	Pass	Pass
Toluene	60	136	20	83	104	23	Pass	Pass	> RPD
Tetrachloroethene	56	138	20	92	105	13	Pass	Pass	Pass
Ethylbenzene	60	143	20	102	90	13	Pass	Pass	Pass
m,p-Xylene	58	142	20	99	92	7	Pass	Pass	Pass
o-Xylene	57	145	20	101	98	3	Pass	Pass	Pass

Note: Control Limits are based on a semi-annual historical evaluation of mobile unit and method guidelines.

Samples:	EXU-1-EFF-1704MS EXU-1-EFF-1704MSD	Date of Analysis: 9/22/2005							
Matrix Spike Compounds	Control Limits			Percent Recoveries			Control Limit Checks		
	Lower	Upper	RPD	MS	MSD	RPD	MS	MSD	RPD
1,4-Dioxane	70	130	20	91	103	12	Pass	Pass	Pass

Note: Control Limits are based on a semi-annual historical evaluation of mobile unit and method guidelines.

Laboratory Control Spikes (LCS):

Samples:	LCS 1 LCS 2 LCS 3	Date of Analysis:	9/21/2005 9/22/2005 9/23/2005					
Spike Compounds	Control Limits		Percent Recoveries			Control Limit Checks		
	Lower	Upper	LCS#1	LCS#2	LCS#3	LCS#1	LCS#2	LCS#3
Vinyl Chloride	15	to 194	109	110	104	Pass	Pass	Pass
1,1-Dichloroethene	41	to 151	132	130	78	Pass	Pass	Pass
Trans-1,2-Dichloroethene	38	to 159	115	111	108	Pass	Pass	Pass
Cis-1,2-Dichloroethene	59	to 138	113	114	104	Pass	Pass	Pass
Benzene	55	to 141	105	106	104	Pass	Pass	Pass
Trichloroethene	57	to 137	104	106	104	Pass	Pass	Pass
Toluene	59	to 138	98	105	102	Pass	Pass	Pass
Tetrachloroethene	57	to 137	99	101	101	Pass	Pass	Pass
Ethylbenzene	60	to 138	91	97	95	Pass	Pass	Pass
m,p-Xylene	57	to 141	95	26	99	Pass	< LCL	Pass
o-Xylene	58	to 141	98	111	97	Pass	Pass	Pass

Note: Control Limits are based on a semi-annual historical evaluation of mobile unit and method guidelines.

KB LABS, INC.

Table 2: VOC Spike Compound Percent Recoveries


Client: TINUS	Driller/Sampler: Purifics	Analyst: Enoch
Site: Former American Beryllium	KB Labs Project Manager: Kelly Bergdoll	KB Labs Project No.: 05-227
Onsite Dates: 09/21/05-09/24/05	Client Project Manager: Paul Calligan	Matrix: Water

Samples: LCS 4		Date of Analysis: 9/24/2005						
Spike Compounds	Control Limits		Percent Recoveries			Control Limit Checks		
	Lower	Upper	LCS# 4			LCS# 4		
Vinyl Chloride	15	tc 194	88			Pass		
1,1-Dichloroethane	41	tc 161	61			Pass		
Trans-1,2-Dichloroethene	36	tc 159	95			Pass		
Cis-1,2-Dichloroethene	59	tc 138	109			Pass		
Benzene	55	tc 141	108			Pass		
Trichloroethene	57	tc 137	127			Pass		
Toluene	59	tc 138	90			Pass		
Tetrachloroethene	57	tc 137	66			Pass		
Ethylbenzene	66	tc 138	60			Pass		
m,p-Xylene	57	tc 141	89			Pass		
o-Xylene	59	tc 144	88			Pass		

Note: Control Limits are based on a semi-annual historical evaluation of mobile unit and method guidelines.

KB LABS, INC.
Final Data Report
Former American Beryllium
Tallevast, FL
September 21-24, 2005


Prepared for: TtNUS

	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID
	EXU-1-INF-0735	EXU-1-INF-1315	EXU-1-EFF-1435	EXU-1-EFF-1635	EXU-1-EFF-1815	EXU-1-INF-1215	EXU-1-EFF-1215	EXU-1-No Tank-1730	EXU-1-INF-1702	EXU-1-EFF-1704	EXU-1-No Tank-1933
Date of Analysis	9/21/2005	9/21/2005	9/21/2005	9/21/2005	9/22/2005	9/22/2005	9/22/2005	9/22/2005	9/23/2005	9/23/2005	9/23/2005
Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water
Dilution Factor	1, 10	1, 100	1	1	1	100	1	200	100	1	100, 200
Vinyl chloride	< 1.0	1.2	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
1,1-Dichloroethene	12.8	26.1	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	120	< 1.0	140
trans-1,2-Dichloroethene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
cis-1,2-Dichloroethene	36.6	66.1	< 1.0	< 1.0	< 1.0	199	< 1.0	310	280	< 1.0	230
Benzene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
Trichloroethene	540	2000	1.3	< 1.0	< 1.0	7500	< 1.0	12000	10000	< 1.0	15000
Toluene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
Tetradecafluoroethane	3.7	4.8	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
Ethylbenzene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
m,p-Xylene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
o-Xylene	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 200	< 100	< 1.0	< 100
1,4-Dioxane	300 J	300 J	< 3.2	< 3.2	< 3.2	200 J	< 3.2	360 J	250 J	< 3.2	260 J

Units for water are µg/L and for soil are mg/kg.
 LCLP Data Quality (P) Values are indicated.

KB LABS, INC.
Final Data Report
Former American Beryllium
Tallevast, FL
September 21-24, 2005


Prepared for: TtNUS

	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID
	EXU-1-EFF-1030	EXU-1-INF-1030	EXU-1-INF-1400	EXU-1-EFF-1402	EXU-1-EFF-1500	EXU-1-Inf (amb) 0700	EXU-1-Tang0700	EXU-1-INF-1030	EXU-1-EFF-1000	EXU-1-CTF-1125	EXU-1-FFF-1400
Date of Analysis:	9/23/2005	9/23/2005	9/23/2005	9/23/2005	9/23/2005	9/24/2005	9/24/2005	9/24/2005	9/24/2005	9/24/2005	9/24/2005
Matrix:	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water
Dilution Factor:	1	100	200	1	1	1,10, 50	100	1, 20	1	1	1
Vinyl chloride	< 1.0	< 100	< 200	< 1.0	< 1.0	2.0	< 100	2.4	< 1.0	< 1.0	< 1.0
1,1-Dichloroethene	< 1.0	110	< 200	< 1.0	< 1.0	320	< 100	160	< 1.0	< 1.0	< 1.0
trans-1,2-Dichloroethene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
cis-1,2-Dichloroethene	< 1.0	270	270	< 1.0	< 1.0	48.1	210	66.0	< 1.0	< 1.0	< 1.0
Benzene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
Trichloroethene	< 1.0	10000	11000	12.5	31.8	650	7300	920	6.8	1.4	22.8
Toluene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
Tetrahaloethene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	1.0	< 1.0	< 1.0	< 1.0
Ethylbenzene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
m,p-Xylene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
o-Xylene	< 1.0	< 100	< 200	< 1.0	< 1.0	< 1.0	< 100	< 1.0	< 1.0	< 1.0	< 1.0
1,4-Dioxane	< 5.2	250 J	250 J	5.1	45.5	1400	600	900	< 3.2	9.0	21.5

Units for all are µg/L and for solids are mg/kg.
 NDFF Den. (amb) - J: values are estimated.

KB LABS, INC.
Final Data Report
Former American Beryllium
Tallevast, FL
September 21-24, 2005

Prepared for: TtNUS

	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID
	SLL-1-BFF-1602										
Date of Analysis:	09/21/2005										
Matrix:	Water										
Dilution Factor:	1										
Vinyl chloride	< 1.0										
1,1-Dichloroethene	< 1.0										
trans-1,2-Dichloroethene	< 1.0										
cis-1,2-Dichloroethene	< 1.0										
Benzene	< 1.0										
Trichloroethene	< 1.0										
Toluene	< 1.0										
Tetrachloroethene	< 1.0										
Ethylbenzene	< 1.0										
m,p-Xylene	< 1.0										
o-Xylene	< 1.0										
1,1-Dioxane	< 3.2										

Units for organics are µg/L and for metals are mg/kg.
 PDEP Diox: Qualifier 1: Values are estimated.



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CHAIN-OF-CUSTODY RECORD

MOBILE UNIT #
KB-2

CLIENT NAME TYNUS		PROJECT NAME & AICM-88 05-227 AMERICAN BERYLLIUM						STATE FL	SAMPLE MATRIX	NUMBER OF CONTAINERS	PRESERVATION 0 Cool 1 NO 2 Un-preserved
SAMPLERS PURIFICS		CONTACT PERSON STEVE RASH						BATCH # (Lab Use Only)			
SAMP # FIELD ID NUMBER	DATE SAMPLED	TIME SAMPLED	D.W.	G.W.	DATE RECD	TIME RECD	SAMPLE LOCATION (IN)			COMMENT	
EXU-1-INF-735	09/21/05	0735			09/21/05	1057		W	2		
EXU-1-INF-1315						1318			2		
EXU-1-EFF-1435						1440					
EXU-1-EFF-1449						1449					
EXU-1-EFF-1635						1637					
Professional Collector Fulfilled by (Signature)		Date/Time	Fulfilled by (Signature)				Date/Time	Remarks and Observations			
Fulfilled by (Signature) <i>Steve Rash</i>		Date/Time 9-24/05	Fulfilled by (Signature) <i>Steve Rash</i>				Date/Time 09/21/05				

Matrix Types: S Soil SW Surface Water GW Ground Water SG Soil Gas



5821 SW Archer Road
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CHAIN-OF-CUSTODY RECORD

MOBILE UNIT #

KB-2

2

CLIENT NAME TETRA TECH		PROJECT NAME & ADDRESS 05-227 FORMER AMERICAN BERYLLIUM FL					SAMPLE MATRIX	NUMBER OF CONTAINERS	SOCKET NUMBER CALIBRATED AND NO. OF CONTAINERS	PRESERVATION C Cooled H ICS OR Other (see Remarks)
CONTACT PERSON STEVE RASH		BATCH # (Lab Use Only)								
SAMPLE FIELD ID NUMBER		DATE SAMPLED	TIME SAMPLED	COMP. QTY	DATE RECD	TIME RECD	STATION LOCATION / No.	VOLATILES		
SAMPLERS PURIFICS		COMMENT								
EXU-1-EFF-1015		092205	1015		092205	1012		W	2	
EXU-1-INF-1215						1222				
EXU-1-EFF-1215						1222				
EXU-1-NO TANK-1700						1703				
EXU-1-INF-1702						1709				
EXU-1-EFF-1704						1712				
Prepared/Collected by (Signature)		Date/Time	Received by (Signature)				Date/Time	Remarks and Observations		
Steve Rash		092205	Cash				092205			

Matrix Types: S Soil, SW Surface Water, GW Ground Water, SG Soil Gas



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CHAIN-OF-CUSTODY RECORD

MOBILE UNIT #
KB-2

CLIENT NAME		PROJECT NAME & ADDRESS						SAMPLE MATRIX	NUMBER OF CONTAINERS	PRESERVATION								
Tetra Tech		05-227 FORMER AMERICAN BERILIER FL																
CONTACT PERSON		BATCH # (Lab Use Only)						VOLATILES	COMMENTS									
PUREFICS		STEVE RASH																
SAMPLE FIELD ID NUMBER	DATE SAMPLED	TIME SAMPLED	COMP.	CRAB	DATE REC'D	TIME REC'D	STAT/CM/LOCATION/ID#											
EXU-1-NO TANK-0650	09/23/05				09/23/05	10:27		W	2									
EXU-1-EFF-1030						10:29												
EXU-1-EFF-1030						10:34												
EXU-1-EFF-1400						14:03												
EXU-1-EFF-1402						14:08												
EXU-1-EFF-1540						15:46												
<table border="1"> <tr> <td>Prepared by (Signature)</td> <td>Date / Time</td> <td>Received by (Signature)</td> <td>Date / Time</td> <td rowspan="2">Remarks and Observations</td> </tr> <tr> <td>Steve Rash</td> <td>9/21/05</td> <td>Erach</td> <td>09/23/05</td> </tr> </table>										Prepared by (Signature)	Date / Time	Received by (Signature)	Date / Time	Remarks and Observations	Steve Rash	9/21/05	Erach	09/23/05
Prepared by (Signature)	Date / Time	Received by (Signature)	Date / Time	Remarks and Observations														
Steve Rash	9/21/05	Erach	09/23/05															

Matrix Types: S Soil, SW Surface Water, GW Ground Water, GG Soil Gas



5021 NW Archer Road
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CHAIN-OF-CUSTODY RECORD

MOBILE UNIT #
KB-2

4

CLIENT NAME TETRA TECH		PROJECT NAME & ADDRESS 05-227 FORMER AMERICAN BERTLIM						SAMPLE MATRIX	NUMBER OF CONTAINERS	RECOVERY EFFICIENCY CALIBRATED LID DATE: 01/10/13	PRESERVATION	
SAMPLES PURPOSES		CONTACT PERSON BATCH # (Lab Use Only)									C (YES)	SE (YES)
SAMPLE FIELD NUMBER	DATE SAMPLED	TIME SAMPLED	DATE REC'D	TIME REC'D	SECTION LOCATION / NO.					COMMENT		
EXL-1-1107/1112-0700	092405		092405	0728			1A	2	✓			
EXL-1-1113-0700				0728								
EXL-1-1114-1000				0958								
EXL-1-EFF-1000				0958								
EXL-1-EFF-1125				1120								
EXL-1-EFF-1400				1410								
EXL-1-EFF-1600				1554								
Prepared/Container Relinquished by: (Signature)		Date/Time	Received by: (Signature)				Date/Time	Remarks and Observations				
Steven Beck		092405	Ernest				092405					

Matrix Types: S Soil SW Surface Water GW Ground Water SG Soil Gas

TEST REPORT – REV. 1

PHOTO-CAT TREATMENT OF GROUNDWATER

AT THE FORMER ABC SITE - SARASOTA

PREPARED FOR

Lockheed Martin Corporation
6801 Rockledge Drive
Bethesda, MD 20817

Attn: Dr. Tina Armstrong

December 12, 2005

Submitted by:

Tony Powell, P.Eng.
Purifics ES Inc.
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Web Site: www.purifics.com

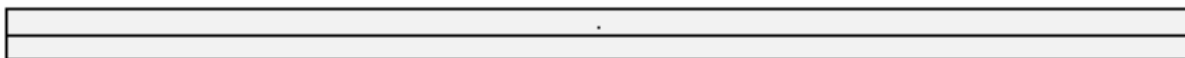


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1 PHOTO-CAT IN-HOUSE TEST PROGRAM OBJECTIVES

The purpose of the on-site test program was to quantify rates of Photo-Cat destruction of 1,4-dioxane and chlorinated solvents in 2 separate groundwater aquifers, and to verify destruction of all targeted contaminants below detectable limits.

2 TEST DESCRIPTION

Two separate pumping tests were performed by the client in which groundwater from 2 aquifers were pumped continuously for 48 hours (upper aquifer) and 24 hours (lower aquifer) respectively. In each pumping test, the groundwater was collected in a 6,000 gallon tank (ie. Collection Tank). Purifics pumped the groundwater from the collection tank using a variable speed driven centrifugal pump into its mobile Photo-Cat system. All treated water was discharged into a 20,000 gallon holding tank.

The groundwater was pumped at various flow rates, ranging from 10 – 19 Lpm (2.6 – 5.0gpm). The groundwater was filtered upstream of the Photo-Cat system using a 10um cartridge filter. The pH was then lowered to remove alkalinity (which is a scavenger of the hydroxyl radical) and to maintain iron in solution. A diaphragm metering pump controlled by the PLC was used to provide precise pH control. A variable frequency drive was used to maintain a constant flow rate. The frequency is adjusted by the PLC as the pressure drop increased across the cartridge filter.

All tests were performed with 1 modular photocatalytic rack. The nominal power of the rack was 2.4 kW. Ambient air was added to the reactor by a compressor and flow meter, at a rate of nominally 100mL/min in all tests, to provide stoichiometric oxygen requirements.

The 2 main parameters that were adjusted throughout the test program were operating pH and system flow rate. Samples were taken throughout the test program and analysed for 1,4-dioxane and other VOCs utilizing an on-site mobile laboratory.

3 RESULTS

All Photo-Cat testing was performed over a 4 day period during business hours. Over the 4 days, 21,266L (5,618 gallons) of groundwater was treated. The groundwater tests were performed on two sources, upper and lower aquifer groundwater.

3.1 Upper Aquifer Testing

Table 1 lists the key inorganic concentrations analyzed by Purifics on-site using field test kits.

Table 1: Key Inorganic Concentrations – Upper Aquifer

Parameter	Concentration
Alkalinity	60 – 80 ppm
Iron	7 – 8 ppm
Chlorides	60 – 80 ppm

Alkalinity, which is a measure of the bicarbonate ion, is important as it is a scavenger of the hydroxyl radical. Sulfuric acid is added to the groundwater to remove the bicarbonate ion. Although the pH buffer at which the bicarbonate ion evolves to CO₂ is nominally 4.6, the pH setpoint at which the Photo-Cat system is operated is typically a function of the iron concentration. The greater the iron concentration, the lower the pH setpoint will be to ensure that the iron remains soluble. The optimal operating pH for the upper aquifer groundwater was 3.0.

Tables 2 – 4 show the Photo-Cat performance data for the tests on the upper aquifer groundwater.

Table 2: Day 1 Testing – Upper Aquifer:

Date Time Sample Description	Wednesday, Sept. 21, 05			
	07:35 Influent	13:15 Influent	14:35 Effluent	16:35 Effluent
Flow Rate (Lpm)	---	---	12	12
pH	---	---	3.8	3.4
Parameter (ug/L)				
Vinyl Chloride	< 1.0	1.2	< 1.0	< 1.0
1,1-Dichloroethylene	12.8	25.1	< 1.0	< 1.0
c-1,2-dichloroethylene	36.6	95.1	< 1.0	< 1.0
Trichloroethylene	540	2800	1.3	< 1.0
Tetrachloroethylene	3.7	4.8	< 1.0	< 1.0
1,4 Dioxane	300	300	< 3.2	< 3.2

The primary purpose of day 1 was to determine the required operating pH to keep iron in solution, and to quantify preliminary treatment rates. As shown in the two tests above, the only parameter altered was operating pH.



Operating at a pH of 3.4 did provide destruction of all targeted parameters below detection limits. There was a slight brown colour on the TiO₂ catalyst at pH 3.4 operation, thus the pH was reduced to 3.0 for all tests on Day 2.

Table 3: Day 2 Testing – Upper Aquifer:

Date Time Sample Description	Thursday, Sept. 22/05				
	10:15 Effluent	12:15 Influent	12:15 Effluent	17:00 Influent	17:00 Effluent
Flow Rate (Lpm)	12	---	12	---	12
pH	3	---	3	---	3
Parameter (ug/L)					
Vinyl Chloride	< 1.0	< 100	< 1.0	< 100	< 1.0
1,1-Dichloroethylene	< 1.0	190	< 1.0	120	< 1.0
c-1,2-dichloroethylene	< 1.0	< 100	< 1.0	280	< 1.0
Trichloroethylene	< 1.0	7500	< 1.0	10,000	< 1.0
Tetrachloroethylene	< 1.0	< 100	< 1.0	< 100	< 1.0
1,4-Dioxane	< 3.2	200	< 3.2	250	< 3.2

It was found in Day 2 that operating at a pH of 3 kept all iron completely dissolved, consequently, pH 3 was maintained for all subsequent tests with the upper aquifer groundwater.

As shown in Tables 2 and 3, the influent TCE concentrations increased dramatically (540ppb up to 10,000ppb). Consequently, the test conditions were unchanged for all effluent samples taken on this day in order to quantify the TCE removal rates versus increasing TCE concentration. All effluent samples were below detectable limits.

Table 4: Day 3 Testing – Upper Aquifer:

Date Time Sample Description	Friday, Sept. 23/05				
	10:30 Influent	10:30 Effluent	14:00 Influent	14:00 Effluent	15:40 Effluent
Flow Rate (Lpm)	---	12	---	16	19
pH	---	3	---	3	3
Parameter (ug/L)					
Vinyl Chloride	110	< 1.0	< 200	< 1.0	< 1.0
1,1-Dichloroethylene	< 100	< 1.0	< 200	< 1.0	< 1.0
c-1,2-dichloroethylene	270	< 1.0	270	< 1.0	< 1.0
Trichloroethylene	10000	< 1.0	11000	12.5	31.9
Tetrachloroethylene	< 100	< 1.0	< 200	< 1.0	< 1.0
1,4-Dioxane	250	< 3.2	250	5.1	43.5

These data show that the influent TCE concentration of the tank had leveled off at nominally 10,000 – 11,000ppb. At these test conditions, all targeted parameters were destroyed below detection limits. In order to get an actual rate of contaminant destruction, it is required that the Photo-Cat system operate in a mode such that breakthrough of targeted parameters is maintained. Consequently, the Photo-Cat system was operated at increased flow rates of 16 and 19 Lpm to accomplish this. Accordingly, low detections of

both TCE and 1,4-dioxane were obtained at increased flow rate operating conditions, and rates of contaminant removal were calculated.

3.2 Lower Aquifer Testing

After Day3, all of the upper aquifer groundwater remaining in the collection tank was pumped out, and the 24 hour pump test for the lower aquifer water was started and ran all night. All Photo-Cat operations on Day4 were on the lower aquifer water.

Table 5 shows the key inorganic concentrations as measured by field test kits. The Photo-Cat performance data obtained on Day 4 for the lower aquifer is shown in Table 6.

Table 5: Key Inorganic Concentrations – Lower Aquifer

Parameter	Concentration
Alkalinity	220 ppm
Iron	2 ppm
Chlorides	100 – 120 ppm

Comparing tables 1 and 5 show that the inorganic concentrations of the 2 aquifers differ significantly. The iron is significantly lower but the chlorides and alkalinity are greater.

Table 6: Day 4 Testing – Lower Aquifer:

Date Time Sample Description	Saturday, Sept. 24/05				
	10:00 Influent	10:00 Effluent	11:25 Effluent	14:00 Effluent	16:00 Effluent
Flow Rate (Lpm)	---	12	12	16	10
pH	---	3	3.5	3.5	3.5
Parameter (ug/L)					
Vinyl Chloride	2.1	< 1.0	< 1.0	< 1.0	< 1.0
1,1-Dichloroethylene	160	< 1.0	< 1.0	< 1.0	< 1.0
c-1,2-dichloroethylene	60	< 1.0	< 1.0	< 1.0	< 1.0
Trichloroethylene	920	6.8	1.4	22.9	< 1.0
Tetrachloroethylene	1	< 1.0	< 1.0	< 1.0	< 1.0
1,4-Dioxane	990	< 3.2	9	21.5	< 3.2

The concentrations of the 1,4-dioxane in the lower aquifer were greater than the upper aquifer, however, the TCE concentrations were lower.

3.3 DATA VALIDATION

Four samples were sent to an off-site contract laboratory for confirmation. The data from the off-site lab compares reasonably well with on-site mobile lab.



4 CONCLUSIONS

It is difficult to compare the results of varying tests when the parameters are different, thus a first order rate constant is used. The rate constant normalizes all key operating parameters to provide an 'apples to apples' comparison. As with normal rate constants, as the rate constant increases the treatment efficiency increases. The rates of contaminant destruction follow first order kinetics as shown in Equation 1.

$$k = 1/t * \ln (C_0/C) \quad 1/$$

Where:
 C_0 = Initial concentration
 C = Final concentration
 t = Time
 k = First order rate constant

The time (t) in Equation 1 is directly proportional to the Photo-Cat power (kW) divided by the flow rate (L/min). Substituting the kW/Lpm ratio for 't' in Equation 1 above gives units of 'L/min / kW' for the rate constant 'k' as shown in Equation 2.

$$k = \text{Flow Rate} / \text{Power} * \ln (C_0/C) \quad 2/$$

Once the rate constant has been obtained, it is used to calculate full-scale treatment requirements by substituting the rate constant, the design flow rate, and the design influent and effluent concentrations into equation 2 and then solve for the power (kW).

Based on the data obtained from on-site testing, the following are the demonstrated rate constants for TCE and 1,4-dioxane.

Table 7: Demonstrated Photo-Cat Rate Constants

Water Source	k - TCE (Lpm/kW)	k - 1,4-Dioxane
Upper Aquifer	45.2	25.9
Lower Aquifer	28.4	23.9
Average	36.8	24.9

The reason why the TCE rates of destruction reduced in the treatment of the lower aquifer water was due to the increase in chloride concentration, which is a scavenger of the hydroxyl radical. The increase in chlorides had a lower impact on 1,4-dioxane destruction.

Applied Project Number P-1638

HiPOx™ Technology Lab Testing:

**Former American Beryllium Site
1600 Tallevast Road
Tallevast, FL**

Prepared for

**Tetra Tech NUS
5421 Beaumont Center Drive
Suite 660
Tampa, FL 33634**

Report Authors: Peter Herlihy and Reid H. Bowman

Report Date: November 4, 2005

Applied



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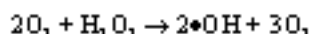
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1.0 Background Information

1.1 HiPOx Technology

The HiPOx™ process developed by Applied Process Technology, Inc. (Applied) is an Advanced Oxidation Process (AOP) that uses ozone (O₃) and hydrogen peroxide (H₂O₂) to destroy organic compounds. Ozone dissociates as well as reacts with hydrogen peroxide to produce an intermediate, hydroxyl radical (•OH). Hydroxyl radicals are the second most powerful oxidizing agent found in nature. These hydroxyl radicals react very rapidly to oxidize organic contaminants to non-hazardous compounds, carbon dioxide, and water.¹ The oxidation of the organic contaminants does not increase the temperature or pressure of the treated water because of the low ppm or sub-ppm concentration of contaminants.

Advanced oxidation chemistry using ozone and hydrogen peroxide to create hydroxyl radicals is well known. The overall balanced reaction for ozone and hydrogen peroxide to yield hydroxyl radical is:



1.2 Objective of Evaluation

The objective of this laboratory trial was to determine the efficiency of the HiPOx technology utilizing ozone and hydrogen peroxide to reduce the concentration of 1,4-dioxane to < 3 ppb and to reduce the concentration of trichloroethylene (TCE) to <5.

1.3 Process Water Information

The tests were conducted on water supplied by Tetra Tech. Two samples of water were received on September 9, 2005: EXU-1Lab and EXL-1Lab. All samples, once received, were logged in and stored in a refrigerator until they were tested.

2.0 Test Equipment and Procedures

2.1 Test Equipment Description

The HiPOx reactor is constructed of PVC. All ozone piping is constructed of either 316 Stainless Steel or Teflon. The hydrogen peroxide piping is constructed of either 316 Stainless Steel or polyethylene. The ozone generator utilized was an AStEX Model 8200. The ozone is injected under pressure into the water to be treated. Mixing of the ozone into the water is accomplished with an in-line static mixer. The vent from the system is passed through an ozone destruct unit manufactured by Pacific Ozone.

2.2 Test Procedures

Test Conditions

All water samples received were tested for pH, alkalinity and turbidity. The HiPOx tests conducted on both samples, EXU-1Lab and EXL-1Lab, occurred on October 7, 2005.

The test procedures for EXU-1Lab and EXL-1Lab were identical. Sample designations reflect sample and treatment levels: as an example, SP-5-1638-EXU represents water sample EXU-1Lab treated with 5 ppm of ozone. The test procedure was as follows: A sample (2.0 liters) was treated with hydrogen peroxide (1.00 mls, 0.5% by wt, 2.5 ppm). This mixture was then treated with ozone (151 mls, 5.0% by wt in oxygen, 5.0 ppm). A sample (SP-5-1638) was taken for 1,4-dioxane and VOC analysis. A total of 6 runs were

¹ W. Glaze and J. Kang, *J. Amer. Water Works Assoc.*, **80**, 51, (1988).

conducted. The amounts of ozone and hydrogen peroxide applied during each run is summarized in Table 1.

Table 1. Summary of Experimental Conditions for Samples EXU-1Lab and EXL-1Lab

Experimental Conditions								
Sample Log #	Run #	Ozone Dose (ppm)	Ozone Conc. (wt%)	Volume of Ozone Added (mls)	H2 O2 Conc. (wt%)	H2 O2 (ppm)	Volume H2 O2 (mls)	Reactor Volume (L)
SP-10-1638-EXU	2	10.0	4.97	181	0.50	4.9	2.00	2
SP-15-1638-EXU	3	14.9	4.97	271	0.50	7.4	3.00	2
SP-8-1638-EXL	4	8.0	4.90	145	0.50	4.0	1.60	2
SP-16-1638-EXL	5	16.0	4.99	289	0.50	7.9	3.20	2
SP-24-1638-EXL	6	24.0	4.99	434	0.50	11.9	4.80	2

Analytical Testing

All samples from the HiPOx test conducted on October 7, 2005 were sent for analysis to Accutest, 4405 Vineland, Suite 15-C, Orlando, Florida 32811, Telephone: (407) 425-6700.

The turbidity meter was an Orbeco-Hellige Model 965-10 Serial# 2222.

3.0 Discussion

1,4-Dioxane and VOC Treatment

The results for the EXU-1Lab samples are shown in Table 2. The results for the EXL-1Lab are presented in Table 3.

Table 2. Summary of Results and Conditions for EXU-1Lab

Lab Analytical Run Sheet 1-1638-EXU																				
Conditions								Results (ppb)												
Run #	O ₃		H ₂ O ₂		Alk. pH	Turbidity (NTU)	Residual		Sample ID	1,4-Dioxane	TCE	PCE	Methyl Ethyl Ketone	Benzene	Acetone	1,1-DCE	1,2-DCE	1,1-DCA	Bromodichloromethane	Chloroform
	Dose (ppm)	Dose (ppm)	Mole Ratio	Alk. (ppm)			H ₂ O ₂ (ppm)	Residual O ₃ (ppm)												
0	0	0	0	-	-	-	-	-	EXU-1Lab	21	132	156	<25	114	10	62	65	201	17	113
1	5.0	2.5	0.70	6.42	1.40	19	2	1.6	SP-5-1638-EXU	<19	37.9	1.4	9.1	60.3	21.5	<0.5	1	22.6	0.93	6.4
2	10.0	4.9	0.70	6.45	1.40	27.5	2	1.5	SP-10-1638-EXU	<19	7.7	0.82	2.9	22.8	26.4	<0.5	<0.5	22.8	0.92	6.6
3	14.9	7.4	0.70	6.46	1.30	29.9	5	1.6	SP-15-1638-EXU	<19	<0.5	<0.5	2.6	31.1	34.7	<0.5	<0.5	19.5	0.95	6.3

Table 3. Summary of Results and Conditions for EXU-1Lab

Lab Analytical Run Sheet 1-16-2008 EXU																						
Run #	O ₃ Dose (ppm)	H ₂ O ₂ Dose (ppm)	pH	Alk. (ppm)	Turbidity (NTU)	Rec ideal H ₂ O ₂ (ppm)	Rec ideal O ₃ (ppm)	Sample ID	1,4-Dioxane	TCE	PCE	Methyl Ethyl Ketone	1,2-Dichloroethane	Tris-n113	Azoxene	1,2-dimethyl-DOE	1,2-dichloro-DOE	1,1-DOE	1,1-DOA	Triethylamine	Benzenedichloromethane	Chloroform
0	0	0	-	-	-	-	-	EXU-1LAB	166	250	0.93	<25	4.9	0.02	0.8	16.3	92.7	123	1.8	3.4	9.3	
4	20	4.0	6.02	130	675	2	2.1	SP-3-1632-EXU	9.9	1.12	<0.5	<0.5	NR	<0.6	<0.5	<0.5	<0.5	<0.5	6.2	<0.5	<0.5	<0.5
5	16.0	7.9	6.07	130	802	3	1.1	SP-16-1632-EXU	<1.9	<0.5	<0.5	<0.5	NR	<0.6	20.4	<0.5	<0.5	<0.5	6.2	<0.5	0.59	1.7
6	24.0	11.9	6.71	160	877	2	0.5	SP-24-1632-EXU	<1.9	<0.5	<0.5	<0.5	NR	<0.6	13.5	<0.5	<0.5	<0.5	3.6	<0.5	<0.5	1.5

EXU

The influent concentrations of 1,4-dioxane and TCE in sample EXU-1Lab were < 3 ppb and 138 ppb, respectively. The data in Table 2 can be used to develop empirical models by plotting the TCE concentration as a function of applied ozone. This plot is then used to create a destruction curve for TCE (see Figure 1). The TCE empirical model can be used to estimate the amount of ozone required to treat TCE from an influent concentration of 138 to an effluent concentration of 3 ppb. This is shown Table 4. In addition, other potential influent TCE concentrations are shown along with the amount of ozone required to reduce each TCE concentration to an effluent of 3 ppb. Effluent concentrations of all the other chlorinated ethylenes (PCE and DCEs) were less than 0.5 ppb, and the effluent 1,4-dioxane was less than 1.9 ppb in HiPOxtreated samples.

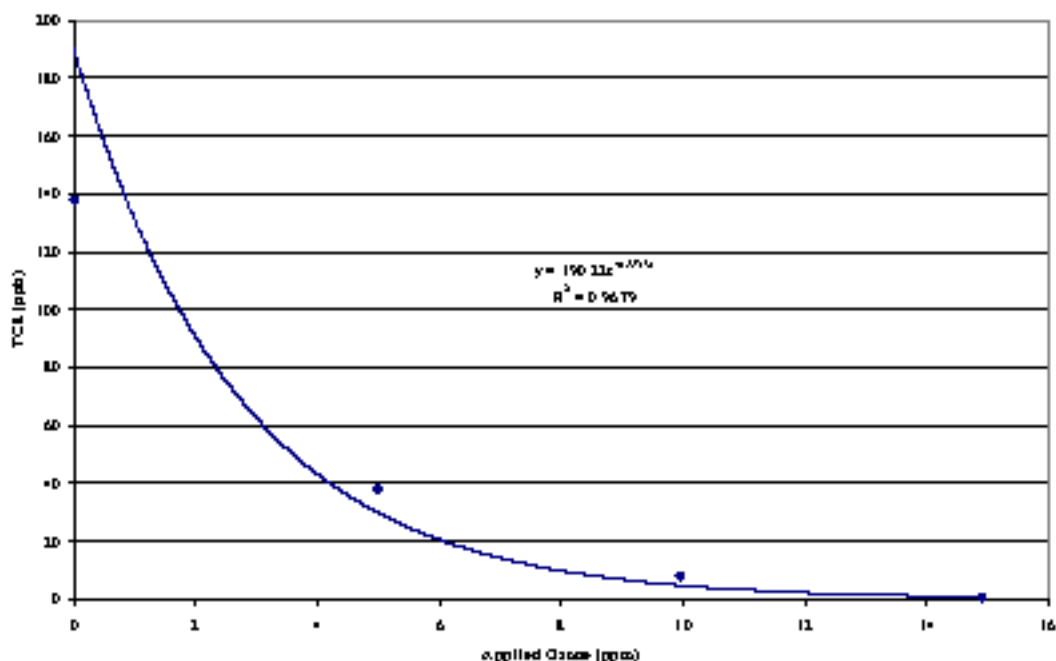


Figure 1. TCE Destruction Curve for EXU-1Lab

Table 4. EXU- TCE Modeling of Ozone Demand at Various TCE Influent Concentrations

Applied O3 (ppm)	TCE Influent (ppb)	TCE Effluent (ppb)
10.3	138	3.0
9.4	100	3.0
11.3	200	3.0
17.5	2000	3.0

EXL

The influent concentrations of 1,4-dioxane and TCE in sample EXL-1Lab were 166 and 2,700 ppb, respectively. The data in Table 3 can be used to develop empirical models for both TCE and 1,4-Dioxane by plotting their concentrations as a function of applied ozone. These plots are then used to create destruction curves for TCE and 1,4-dioxane (see Figures 2 and 3). These empirical models can be used to estimate the ozone required to treat various influent concentrations of the contaminants, TCE and 1,4-dioxane, to the required discharge concentrations. This is shown Table 5. In EXL-1Lab there are two compounds of concern, TCE and 1,4-dioxane. The concentrations of each of these contaminants will determine which contaminant controls the ozone dose required. For example, when the 1,4-dioxane concentration is high, >500 ppb, the amount of ozone required is determined by the 1,4-dioxane concentration (assuming a constant TCE concentration). However, at lower 1,4-dioxane concentrations, <300 ppb, the amount of ozone required is determined by the influent TCE concentration.

Effluent concentrations of all the other chlorinated ethylenes (PCE, DCEs, vinyl chloride) were less than 0.5 ppb after H₂O₂ treatment.

Table 5. EXL- TCE and 1,4-Dioxane Modeling of Ozone Demand at Various Influent Concentrations

Entry	Applied O3 (ppm)	TCE		1,4-Dioxane	
		Influent (ppb)	Effluent TCE (ppb)	Influent (ppb)	Effluent (ppb)
1	15.2	2700	2.05	500	3.20
2	13.6	2700	4.23	300	3.20
3	14.3	2700	3.00	300	2.51

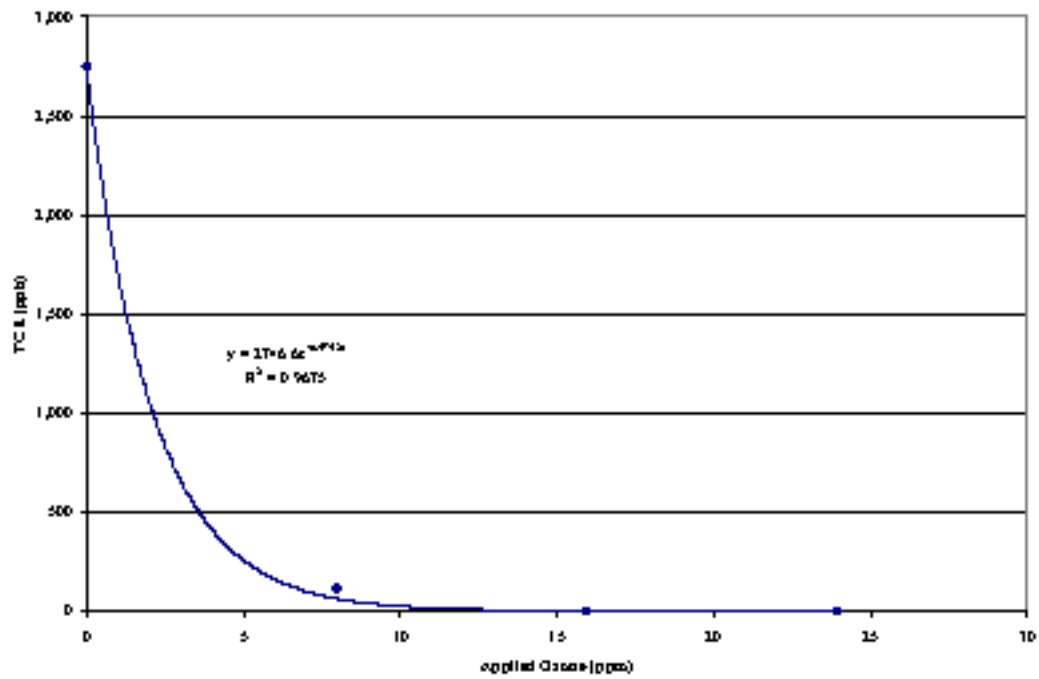


Figure 2. TCE Destruction Curve for EXL-1Lab

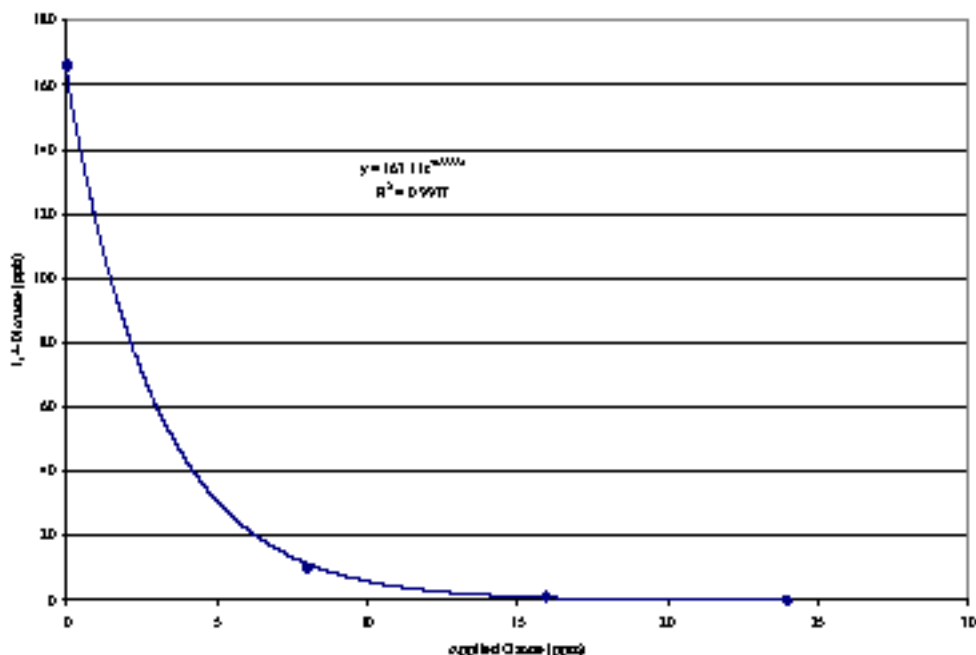


Figure 3. 1,4-Dioxane Destruction curve for EXL-1 Lab

4.0 Conclusion

HiPOx technology, which uses ozone and hydrogen peroxide, is a very effective process for destroying 1,4-dioxane, TCE and other chlorinated ethylenes in groundwater at the Tallevast site. This was accomplished in both water samples provided EXU-1 lab and EXL-1 lab.

An empirical predictive model was developed to estimate applied ozone requirements. The model was used to estimate the ozone dose required to reduce concentrations of 1,4-dioxane and TCE to less than 3.2 and 3 ppb, respectively. This model could be used to estimate the ozone dose required for varying influent concentrations of 1,4-dioxane and TCE.

In order to treat water from the Tallevast site with an influent concentrations of 500 ppb 1,4-dioxane and 2,000 ppb TCE to effluent concentrations of <3.2 ppb and <3 ppb, respectively, an ozone dose of 15.2 would be required based on the empirical model developed for EXL-1 lab.

**Appendix:
Analytical Reports**

Note: Key data has been extracted from the full raw water analytical report for inclusion in this appendix. The complete report is available upon request.



09/20/05

Technical Report for

Tetra Tech NUS

Former American Beryllium, Sarasota, FL

NI075

Accutest Job Number: F34701

Sampling Date: 09/07/05

Report to:

Total number of pages in report: 91



Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Conference and/or state specific certification programs as applicable.

Harry Behzadi
Harry Behzadi, Ph.D.
Laboratory Director

Certifications: IL (DOH E68510), DC (373), NJ (SI 002), MA (61964), IA (166), LA (40053), RS (04-0129), NC, AK
This report shall not be reproduced, except in its entirety, without the written approval of Accutest Laboratories.

Report of Analysis

Client Sample ID:	EX11-11A/B	Date Sampled:	09/07/05
Lsh Sample ID:	F14701-1	Date Received:	09/09/05
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	DT	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	C0315287.D	1	05/13/05	KW	n/a	n/a	VC1431
Run #2	H015241.D	2	05/15/05	KW	n/a	n/a	VD1405

	Purge Volume
Run #1	5.0 ml
Run #2	5.0 ml

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone *	10.0 U	25	5.0	ug/l	1
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-4	Bromodichloromethane	1.0 U	1.0	0.50	ug/l	
75-25-2	Bromoform	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-09-5	Chloroethane	1.0 U	2.0	1.0	ug/l	
57-86-5	Chloroform	11.3 U	1.0	0.50	ug/l	
75-15-0	Carbon tetrachloride	1.0 U	2.0	1.0	ug/l	1
56-33-5	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	20.1 U	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	5.8 U	1.0	0.50	ug/l	
95-12-8	1,2-Dibromo-1,1-dichloroethane	1.0 U	2.0	1.0	ug/l	
156-93-4	1,2-Dibromoethane	0.50 U	1.0	0.50	ug/l	
133-06-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-5	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
354-23-4	1,2-Dichlorotribromoethane	9.5 U	2.0	0.70	ug/l	
124-48-1	Dibromochloromethane	0.40 U	1.0	0.40	ug/l	
75-71-8	Dichlorodifluoromethane	0.50 U	1.0	0.50	ug/l	
156-59-2	cis-1,2-Dichloroethylene	6.0 U	1.0	0.50	ug/l	
1056-101-8	cis-1,3-Dichloropentane	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
95-50-7	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
105-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-60-5	trans-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10561-02-6	trans-1,3-Dichloropropene	0.50 U	1.0	0.30	ug/l	
100-11-1	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-17-1	Hexane 115	114 U	2.0	1.2	ug/l	
591-73-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
78-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
105-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
79-20-9	Methyl Acetate	5.0 U	10	5.0	ug/l	

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

1 = Result >= MDL, but < RL. J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	EXJ-11,LAB	Date Sampled:	09/07/05
Lab Sample ID:	134701-1	Date Received:	09/09/05
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8250B		
Project:	Conasa American Bayfilling, Sarasota, FL		

VOA TCT 4,2 List

CAS No.	Compound	Result	RT	MDL	Units	Q
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	
74-83-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
158-87-2	Methylcyclohexane	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-93-3	Methyl ethyl ketone	2.5 U	3.0	2.5	ug/l	
1634-04-4	Methyl Tert Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-5	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
79-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-09-5	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
123-82-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloroethylene	15.6	1.0	0.50	ug/l	
108-85-2	Toluene	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	1.38	2.0	1.0	ug/l	
75-69-1	Triclorofluoroethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
1868-53-7	Dibromofluoromethane	111%	99%	86-115%
17060-07-0	1,2-Difluorobenzene-D4	113%	93%	73-126%
2037-24-5	Fluorene-D8	95%	108%	66-113%
460-00-4	4-Bromofluorobenzene	103%	114%	57-119%

- (a) Associated BS recovery outside control limits
- (b) Results from Run# 2

U = Not detected MDL = Method Detection Limit
 RT = Reporting Limit
 L = Indicates value exceeds calibration range

J = Result > = MDL but < RT. J = Reporting value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	EX-1-LAB	Date Sampled:	09/07/05
Lab Sample ID:	FB4701-1	Date Received:	09/09/05
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270C SW846 8510C		
Project:	Former American Beryllium, Sarasota, FL		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	FB11475.D		09/13/05	NJ	09/12/05	OP14586	SI6631
Run #2							

	Initial Volume	Final Volume
Run #1	1000 ml	1.0 ml
Run #2		

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,1-Dioxane	2.1	5.0	2.0	ug/l	1
CAS No.	Strongest Recoveries	Run# 1	Run# 2	Limit		
367-12-7	2-Chlorophenol	77%		19-90%		
4165-62-2	Phenol-15	17%		13-68%		
113-79-6	2,4,6-Trinitrophenol	87%		36-137%		
1155-63-0	Nitrobenzene-15	82%		49-115%		
321-60-8	2-Fluorophenol	79%		45-118%		
1718-51-0	1-phenyl ethyl	83%		45-135%		

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

[-] = Result > = MDL, but < RL [] = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID: E3L-JLA9	Date Sampled: 09/07/05
Lab Sample ID: F54701-2	Date Received: 09/09/05
Matrix: AQ - Ground Water	Percent Solids: n/a
Methods: SW846 8260B	
Project: Former American Beryllium, Sarasota, FL	

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	B033710.D	50	09/15/05	KW	n/a	n/a	VB1432

Run #1	Purge Volume
Run #2	5.0 ml

VOA TCL 4.3 List

CAS No.	Compound	Result	RI	MDL	Units	Q
67-64-1	Acetone ^b	6.8	35	5.0	ug/l	1
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-4	Bromodichloromethane	3.4	1.0	0.50	ug/l	
75-25-2	Bromoform	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-08-3	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-66-3	Chloroform	9.3	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
56-23-5	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	12.3	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	92.7 ^b	50	25	ug/l	
96-12-8	1,2-Dichloro-3-cyclopropane	1.0 U	2.0	1.0	ug/l	
136-93-4	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
129-05-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-3	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
35-23-7	1,2-Dichlorotrifluoroethane	48.9	2.0	0.70	ug/l	
12-48-1	Dibromochloromethane	0.82	1.0	0.40	ug/l	1
75-71-8	Dichlorodifluoromethane	0.50 U	1.0	0.50	ug/l	
156-59-2	cis-1,2-Dichloroethylene	100 ^b	50	25	ug/l	
10361-01-5	cis-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
95-50-1	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
106-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
155-60-5	trans-1,2-Dichloroethylene	0.78	1.0	0.50	ug/l	1
10561-32-6	trans-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
105-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-13-1	Freon 113	0.62	1.0	1.60	ug/l	1
591-78-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	1,3-cyclohexadiene	0.50 U	1.0	0.50	ug/l	
108-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
79-20-9	Methyl Acetone	5.0 U	19	5.0	ug/l	

U = Not detected MDL = Method Detection Limit J = Result > MDL but < RL I = Estimated value
 RL = Reporting Limit V = Indicates analyte found in associated method blank
 L = Indicates value exceeds calibration range N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	EXL-17.5B	Date Sampled:	09/07/05
Lab Sample ID:	F34761-2	Date Received:	09/09/05
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Dryclean, Sarasota, FL		

VOA 1CL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
108-07-2	Methylcyclohexane	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-93-3	Methyl ethyl ketone	2.5 U	5.0	2.5	ug/l	
1634-34-4	Methyl tert-Butyl ether	0.50 U	1.0	0.50	ug/l	
100-42-5	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
79-24-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-00-5	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
120-82-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloroethylene	0.93	1.0	0.50	ug/l	T
138-86-3	Valone	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	3250	50	25	ug/l	
75-69-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	1.8	1.0	0.50	ug/l	
1030-20-7	Xylene (total)	1.0 U	2.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Units
1868-53-7	Dibromofluoromethane	112%	100%	86-113%
17760-07-0	1,2-Dichloroethane-D4	117%	93%	73-126%
9017-26-6	Toluene-D8	93%	195%	86-112%
403-50-4	4-Bromofluorobenzene	103%	199%	82-119%

CAS No.	Tentatively Identified Compounds ^(d)	R.T.	Est. Conc.	Units	Q
	Total TIC, Volatile		0.0000	ug/l	

- (a) Sample was not preserved to a pH < 2.
 (b) Assay met 85 recovery outside control limits.
 (c) Result is from Run# 2
 (d) No TICs detected.

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates when exceeds calibration range

* = Result > = MDL and < RL. U = Estimated value
 V = Indicates analyte found in associated method blank.
 T = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	EXL-1LAB	Date Sampled:	09/09/05
Lab Sample ID:	FS1201-2	Date Received:	09/09/05
Matrix:	AQ - Ground Water	Percent Solids:	nt.
Method:	SW846 8270C - SW846 3510C		
Project:	Former American Bury Farm, Sarasota, FL		

Run #	File ID	DI	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	FD11486.L	2	09/13/05	N	09/13/05	0217186	SP621
Run #2							

Run #	Initial Volume	Final Volume
Run #1	900 ml	1.0 ml
Run #2		

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,4-Dioxane	166	11	4.4	µg/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
507-12-4	2-Fluorophenol	21%		19-90%		
4165-02-2	Phenol-d5	13%		10-68%		
118-79-6	2,4,6-Trichlorophenol	91%		36-157%		
155-50-3	Nitrobenzene-d5	81%		45-119%		
321-60-8	2-Fluorobiphenyl	30%		45-118%		
1718-51-5	Toluene-d14	36%		46-125%		

J = Not detected MDL = Method Detection Limit

RL = Reporting Limit

L = Indicates value exceeds calibration range

J = Result > = MDL, but < RL J = Estimated value

V = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

Sample Summary

Tetra Tech NUS

Job No: F35479

Former American Beryllium, Sarasota, FL
 Project No: N1075, Order Number 1004773

Sample Number	Collected Date	Time By	Received	Matrix Code	Type	Client Sample ID
F35479-1	10/03/05	07:10	DDS	10/04/05	AQ Water	SP-5-1638-EXL
F35479-2	10/03/05	07:30	DDS	10/04/05	AQ Water	SP-10-1638-EXL
F35479-3	10/03/05	07:55	DDS	10/04/05	AQ Water	SP-15-1638-EXL
F35479-4	10/03/05	08:15	DDS	10/04/05	AQ Water	SP-8-1638-EXL
F35479-5	10/03/05	08:30	DDS	10/04/05	AQ Water	SP-16-1638-EXL
F35479-6	10/03/05	09:00	DDS	10/04/05	AQ Water	SP-24-1638-EXL

Report of Analysis

Client Sample ID:	SP-6-1638 EXC	Date Sampled:	10/03/05
Lab Sample ID:	F35479.1	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

Run #	File ID	IN	Analyzed	By	Prep Date	Prep Batch	Analyzing Batch
Run #1	R0007390.D	1	10/13/05	KK	n/a	n/a	VN310
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone	21.6 U	25	5.0	ug/l	1
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-1	Bromochloroacetic acid	0.93 U	1.0	0.50	ug/l	1
75-25-2	Bromoform	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-00-3	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-66-3	Chloroform	0.4	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
56-23-5	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	22.6	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
96-12-8	1,2-Dibromo-3-chloropropane	1.0 U	2.0	1.0	ug/l	
106-93-4	1,2-Dibromoethane	0.50 U	1.0	0.50	ug/l	
107-06-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-1	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
124-48-1	Dibromochloroethane	0.40 U	1.0	0.40	ug/l	
75-71-8	Dichlorodifluoroethane	0.50 U	1.0	0.50	ug/l	
156-49-2	cis-1,2-Dichloroethylene	1.0	1.0	0.50	ug/l	
10061-01-5	cis-1,3-Dichloropropane	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
95-50-1	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
106-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-49-5	trans-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-02-8	trans-1,3-Dichloropropane	0.30 U	1.0	0.30	ug/l	
100-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-13-1	Freon 113	60.3	1.0	0.60	ug/l	
591-78-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
108-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
79-20-9	Methyl Acetate	5.0 U	10	5.0	ug/l	
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 1 = Indicates value exceeds calibration range

[= Result >= MDL but < RL] = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP 5 1858 EXD	Date Sampled:	10/03/05
Lab Sample ID:	F35479-1	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8230B		
Project:	Former American Beryllium, Sarasota, FL		

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
109-87-2	Methylcyclohexane	0.50 U	1.0	0.50	ug/l	
75-00-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-83-3	Methyl ethyl ketone	0.1 U	5.0	2.5	ug/l	
1634-04-4	Methyl Tertiary Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-5	Styrene	0.50 U	1.0	0.50	ug/l	
71-85-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
79-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-00-5	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
120-82-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-1	Tetrachloroethylene	1.4 U	1.0	0.50	ug/l	
108-88-3	Toluene	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	37.9 U	1.0	0.50	ug/l	
75-69-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
1868-53-7	Dichlorofluoromethane	100%		86-118%
17060-07-0	1,2-Dichloroethane (D4)	98%		73-120%
2037-26-3	Toluene-DB	107%		86-112%
460-00-4	4-Bromofluorobenzene	99%		83-119%

U = Not detected MDL - Method Detection Limit
 RL - Reporting Limit
 T - Indicates value exceeds calibration range

I - Result > = MDL but < RL J - Estimated value
 V - Indicates analyte found in associated method blank
 N - Indicates presumptive evidence of a compound

Report of Analysis

Page 1 of 1

Client Sample ID:	SP-5-1638 KXU	Date Sampled:	10/03/05
Lab Sample ID:	E35479-1	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8270C SW846 3510C		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	E011934.D	1	10/10/05	NJ	10/07/05	OP14630	SF650

Run #1	Initial Volume	Final Volume
Run #2	1040 ml	1.0 ml

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,4-Dioxane	1.9 U	4.8	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
4105-80-0	Nitrobenzene-d5	63%		49-110%
321-60-8	2-Fluorobiphenyl	68%		45-118%
1718-54-0	Tetraphenyl-d14	59%		46-135%

U = Not detected MDL = Method Detection Limit

RL = Reporting Limit

I = Indicates value exceeds calibration range

E = Result \geq MDL but $<$ RL J = Estimated value

V = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP 10 1638 RXII	Date Sampled:	10/03/05
Lab Sample ID:	F35479-2	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	EJL ID	DF	Analyzed	By	Print Date	Prep Batch	Analytical Batch
Run #2	N0007386.D	1	10/13/05	KK	n/a	n/a	VN310

Run #1	Purge Volume
Run #2	5.0 ml

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone	28.4	25	5.0	ug/l	
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-4	Bromodichloromethane	0.98	1.0	0.50	ug/l	1
75-25-2	Bromoform	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-00-3	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-66-3	Chloroform	6.6	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
56-23-6	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	22.8	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
96-12-8	1,2-Dibromo-3-chloropropane	1.0 U	2.0	1.0	ug/l	
106-93-1	1,2-Dibromomethane	0.50 U	1.0	0.50	ug/l	
107-06-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-5	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
124-48-1	Dibromochloromethane	0.40 U	1.0	0.40	ug/l	
75-71-8	Dibromodifluoromethane	0.50 U	1.0	0.50	ug/l	
135-59-2	cis 1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10081-01-5	cis 1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
531-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
85-50-1	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
106-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-60-5	trans-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-02-6	trans-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
100-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
78-113-1	Tetra 113	38.8	1.0	0.80	ug/l	
501-70-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
108-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
78-20-8	Methyl Acetate	0.0 U	10	0.0	ug/l	
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	

U = Not detected MDL = Method Detection Limit

RL = Reporting Limit

] = Indicates value exceeds calibration range

(-) = Result > = MDL, but < RL.] = Estimated value

V = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-10-1638-RXU	Date Sampled:	10/03/05
Lab Sample ID:	F35470-2	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Furner American Recyclium, Sarasota, FL		

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
108-87-2	Methylene dichloride	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-03-3	Methyl ethyl ketone	2.0	5.0	2.0	ug/l	I
1634-01-4	Methyl Tertiary Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-7	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
78-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
78-00-8	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
129-83-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloroethylene	0.62	1.0	0.50	ug/l	I
108-88-3	Toluene	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	2.7	1.0	0.50	ug/l	
75-89-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
1868-53-7	Dibromofluoromethane	100%		88-115%
17060-07-0	1,2-Dichloroethane-D1	100%		75-126%
2037-26-8	Toluene D8	107%		88-117%
480-00-4	4-Bromofluorobenzene	101%		83-111%

U = Not detected MDL = Method Detection Limit [= Result > = MDL, but < RL] = Estimated value
 RL = Reporting Limit V = Indicates analyte found in associated method blank
 L = Indicates value exceeds calibration range N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-10-1638-EXU	Date Sampled:	10/03/05
Lab Sample ID:	F85429-2	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8270C - SW846 8510C		
Project:	Former American Deryldum, Sarasota, FL		

Run #	Inlet ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	F011905.1	1	10/10/05	NT	10/07/05	QP14636	ST060
Run #2							

Run #	Initial Volume	Final Volume
Run #1	1040 ml	1.0 ml
Run #2		

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,1-Dioxane	1.9 U	4.8	1.9	ug/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
4165-60-0	Nitrobenzene-d5	61%		40-110%		
821-60-8	2-Fluorobiphenyl	60%		46-118%		
1718-51-0	Terphenyl-d14	51%		46-135%		

U - Not detected MDL - Method Detection Limit Y - Result >= MDL but < RL J - Estimated value
 RL - Reporting Limit V - Indicates analyte found in associated method blank
 L - Indicates value exceeds calibration range N - Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP 15 1638 BXU	Date Sampled:	10/03/05
Lab Sample ID:	FJ5479 3	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	UI	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	N0097387.D	1	10/13/05	KK	n/a	n/a	VN310

Run #1	Purge Volume
Run #2	5.0 ml

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone	34.7	25	5.0	ug/l	
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-1	Bromodichloromethane	0.95	1.0	0.50	ug/l	1
75-25-2	Bromofuran	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	11.50 U	1.0	0.50	ug/l	
75-00-3	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-86-3	Chloroform	0.3	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
56-23-5	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
78-34-3	1,1-Dichloroethane	10.5	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
98-12-8	1,2-Dibromo-3-chloropropane	1.0 U	2.0	1.0	ug/l	
106-93-1	1,2-Dibromoethane	0.50 U	1.0	0.50	ug/l	
110-46-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-5	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
124-68-1	Dibromodichloromethane	0.40 U	1.0	0.50	ug/l	
73-71-8	Dichlorodifluoroethane	0.50 U	1.0	0.50	ug/l	
138-89-2	cis-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10081-01-5	cis-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
95-50-1	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
106-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-89-5	trans-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-02-0	trans-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
100-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-18-1	Freon 113	31.1	1.0	0.80	ug/l	
601-78-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
108-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
79-20-8	Methyl Acetate	5.0 U	10	5.0	ug/l	
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	

U = Not Detected MDL - Method Detection Limit
 RL = Reporting Limit
 1 = Indicates value exceeds calibration range

1 = Result > = MDL but < RL 1 = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-15-1638-FXU	Date Sampled:	10/03/05
Lab Sample ID:	F35479-3	Date Received:	10/04/05
Matrix:	AQ Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

VOA TCT 4.2 List

CAS No	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
108-87-2	Methylcyclohexane	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-93-3	Methyl ethyl ketone	2.6	5.0	2.5	ug/l	1
1634-04-1	Methyl Tert Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-6	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
79-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-00-5	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
170-82-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloroethylene	0.50 U	1.0	0.50	ug/l	
108-88-3	Toluene	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	0.50 U	1.0	0.50	ug/l	
75-89-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Units
1868-33-7	Dibromofluoromethane	100%		86-115%
17060-07-0	1,2-Dichloroethane-D4	101%		73-126%
2087-26-6	Toluene-D8	107%		86-112%
400-90-4	4-Bromofluorobenzene	101%		83-119%

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

(= Result >= MDL, but < RL U = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP 16-1638-EXD	Date Sampled:	10/03/05
Lab Sample ID:	F35478 S	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8270C SW846 3510C		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	PF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	F011908.D	1	10/10/05	NJ	10/07/05	OP14636	SF650

Run #1	Initial Volume	Final Volume
Run #2	1040 ml	1.0 ml

CAS No.	Compound	Result	RL	MDL	Units	Q
128-01-1	1,4-Dioxane	1.0 U	4.8	1.9	ug/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
4165-60-0	Nitrobenzene-d5	89%		48-118%		
321-60-8	2-Fluorobiphenyl	76%		45-118%		
1718-51-0	1-Propenyl-d14	66%		46-135%		

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 I = indicates value exceeds calibration range

I = Result > = MDL, but < RL J = Estimated value
 V = Indicates empty found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID: SP-8-1838-PXJ	Date Sampled: 10/03/05
Lab Sample ID: F35473-4	Date Received: 10/04/05
Matrix: A1J Water	Percent Solids: n/a
Method: SW846 8260B	
Project: Former American Beryllium, Sarasota, FL	

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	J018465.11	5	10/13/05	MDM	n/a	n/a	V1762

Run #1	Purge Volume
Run #2	5.0 ml

VOL 101 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
87-64-1	Acetone	25 U	100	25	ug/l	
71-43-2	Benzene	2.5 U	5.0	2.5	ug/l	
75-27-4	Bromodichloromethane	2.5 U	5.0	2.5	ug/l	
75-27-2	Bromoethane	2.5 U	5.0	2.5	ug/l	
108-90-7	Chlorobenzene	2.5 U	5.0	2.5	ug/l	
75-00-3	Chloroethane	5.0 U	10	5.0	ug/l	
67-66-3	Chloroform	2.5 U	5.0	2.5	ug/l	
78-13-0	Carbon disulfide	5.0 U	10	5.0	ug/l	
56-23-5	Carbon tetrachloride	2.5 U	5.0	2.5	ug/l	
140-82-7	Cyclohexane	2.5 U	5.0	2.5	ug/l	
75-34-3	1,1-Dichloroethane	8.6 U	5.0	2.5	ug/l	
75-35-4	1,1-Dichloroethylene	2.5 U	5.0	2.5	ug/l	
96-12-9	1,2-Dibromo-3-chloropropane	5.0 U	10	5.0	ug/l	
100-93-4	1,2-Dibromomethane	2.5 U	5.0	2.5	ug/l	
107-06-2	1,2-Dichloroethane	2.5 U	5.0	2.5	ug/l	
78-87-5	1,2-Dichloropropane	2.5 U	5.0	2.5	ug/l	
124-48-1	1,1,1-Trichloroethane	2.0 U	5.0	2.0	ug/l	
75-71-8	Dichlorodifluoromethane	2.5 U	5.0	2.5	ug/l	
156-58-2	cis-1,2-Dichloroethylene	2.5 U	5.0	2.5	ug/l	
14061-01-9	cis-1,3-Dichloropropane	1.5 U	5.0	1.5	ug/l	
541-78-1	m-Dichlorobenzene	2.5 U	5.0	2.5	ug/l	
95-50-1	n-Dichlorobenzene	2.5 U	5.0	2.5	ug/l	
106-46-7	p-Dichlorobenzene	2.5 U	5.0	2.5	ug/l	
156-60-5	trans-1,2-Dichloroethylene	2.5 U	5.0	2.5	ug/l	
14061-02-6	trans-1,3-Dichloropropane	1.5 U	5.0	1.5	ug/l	
100-41-4	Ethylbenzene	2.5 U	5.0	2.5	ug/l	
76-13-1	Freon 113	3.0 U	5.0	3.0	ug/l	
591-78-6	2-Hexanone	13 U	25	13	ug/l	
98-62-8	Isopropylbenzene	2.5 U	5.0	2.5	ug/l	
108-10-1	4-ethyl-2-pentanone	13 U	25	13	ug/l	
79-20-9	Methyl Acetate	25 U	50	25	ug/l	
74-83-9	Methyl bromide	5.0 U	10	5.0	ug/l	

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

1 = Result > = MDL but < RL J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-B-1638 EXL	Date Sampled:	10/03/05
Lab Sample ID:	F33479-4	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260H		
Project:	Former American Beryllium, Sarasota, FL		

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	5.0 U	10	5.0	ug/l	
108-87-2	Methylcyclohexane	2.5 U	5.0	2.5	ug/l	
75-09-2	Methylene chloride	5.0 U	25	5.0	ug/l	
78-93-3	Methyl ethyl ketone	13 U	25	1.3	ug/l	
1634-01-4	Methyl Tert Butyl Ether	2.5 U	5.0	2.5	ug/l	
100-42-5	Styrene	2.5 U	5.0	2.5	ug/l	
71-53-6	1,1,1-Trichloroethane	2.5 U	5.0	2.5	ug/l	
79-34-5	1,1,2,2-Tetrachloroethane	2.0 U	5.0	2.0	ug/l	
79-00-5	1,1,2-Trichloroethane	2.5 U	5.0	2.5	ug/l	
120-82-1	1,2,4-Trichlorobenzene	2.5 U	5.0	2.5	ug/l	
127-18-4	Tetrachloroethylene	2.5 U	5.0	2.5	ug/l	
108-88-3	Toluene	2.5 U	5.0	2.5	ug/l	
79-01-6	Trichloroethylene	117	5.0	2.5	ug/l	
75-69-4	Trichlorofluoroethane	2.5 U	10	2.5	ug/l	
75-01-4	Vinyl chloride	2.5 U	5.0	2.5	ug/l	
1330-20-7	Xylene (total)	5.0 U	15	5.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
1868-53-7	Dibromofluoromethane	105%		96-115%
17060-07-0	1,2-Dichloroethane-D4	116%		73-120%
2057-26-5	Toluene D8	89%		83-112%
400-00-4	4-Bromofluorobenzene	112%		83-119%

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

J = Result > = MDL but < RL J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Page 1 of 1

Client Sample ID:	SP # 1638 EXL	Date Sampled:	10/03/05
Lab Sample ID:	F35479-4	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8270C SW846 3010C		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	F011908.D	1	10/10/05	NJ	10/07/05	0P14636	S0650

Run #1	Initial Volume	Final Volume
Run #2	1040 ml	1.0 ml

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,4 Dioxane	9.9	4.8	1.0	ug/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
4165-80-0	Nitrobenzene-d5	56%		49-119%		
321-60-8	2-Fluorobiphenyl	60%		45-118%		
1718-51-0	Terphenyl-d14	51%		48-115%		

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 I = Indicates value exceeds calibration range

T = Result > = MDL but < RL J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

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Client Sample ID:	SP-II-1638-EXL	Date Sampled:	10/03/05
Lab Sample ID:	F35479 5	Date Received:	10/04/05
Matrix:	AQ Water	Parental Solids:	n/a
Method:	SW846 8230A		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	DP	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	N0007388.D	1	10/13/05	KS	n/a	n/a	VN310

Run #1	Purge Volume
Run #2	5.0 ml

VOA TCL v.2 List

CAS No	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone	20.4	25	5.0	ug/l	L
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-4	Bromodichloromethane	0.59	1.0	0.50	ug/l	L
75-25-2	Bromotoluene	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-00-8	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-86-3	Chloroform	1.7	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
65-23-6	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	0.2	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
96-12-8	1,2-Dichloro-3-cyanopropane	1.0 U	2.0	1.0	ug/l	
106-98-4	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
107-06-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-6	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
124-48-1	Dibromochloromethane	0.40 U	1.0	0.50	ug/l	
75-71-8	Dichlorodifluoromethane	0.50 U	1.0	0.50	ug/l	
158-59-7	cis-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-01-5	cis-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
95-50-1	o-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
108-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-60-5	trans-1,2-Dichlorocyclyene	0.50 U	1.0	0.50	ug/l	
10061-02-6	trans-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
100-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-13-1	Freon 113	0.60 U	1.0	0.80	ug/l	
501-78-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
108-10-1	4 Methyl 2-pentanone	2.5 U	5.0	2.5	ug/l	
75-20-9	Methyl Acetate	5.0 U	10	5.0	ug/l	
74-83-0	Methyl bromide	1.0 U	2.0	1.0	ug/l	

U = Not detected MDL = Method Detection Limit

RL = Reporting Limit

L = Indicates value exceeds calibration range

J = Result > = MDL, but < RL. J = Estimated value

V = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

Report of Analysis

Page 2 of 2

Client Sample ID:	SP-16-1635-EXL	Date Sampled:	10/03/05
Lab Sample ID:	F35179-6	Date Received:	10/04/05
Matrix:	AQ Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Dryclean, Sarasota, FL		

VOCs (CL) 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
108-97-2	Methylene dichloride	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-93-3	Methyl ethyl ketone	2.5 U	5.0	2.5	ug/l	
1634-04-1	Methyl Tert Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-5	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
79-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-00-5	1,1,2 Trichloroethane	0.50 U	1.0	0.50	ug/l	
120-82-1	1,2,4 Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloroethylene	0.50 U	1.0	0.50	ug/l	
108-88-3	Toluene	0.50 U	1.0	0.50	ug/l	
78-01-6	Trichloroethylene	0.50 U	1.0	0.50	ug/l	
75-89-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
1868-53-7	Dibromofluoromethane	101%	101%	86-115%
17000-07-0	1,2-Dichloroethane-D4	101%	101%	73-120%
2037-26-5	Toluene D8	105%	105%	88-112%
400-00-4	4-Bromofluorobenzene	89%	89%	83-119%

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

J = Result > = MDL, but < RL. J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Page 1 of 1

Client Sample ID:	SP-16-1638-EXL	Date Sampled:	10/03/05
Fish Sample ID:	645478 S	Date Received:	10/04/05
Matrix:	AQ Water	Percent Solids:	n/a
Method:	SW846 8270C SW846 3510C		
Project:	Former American Beryllium, Sarasota, FL		

Run #1	File ID	ID	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	F011920.D	1	10/10/05	NJ	10/19/05	CP14636	SP558

Run #1	Initial Volume	Final Volume
Run #2	1040 ml	1.0 ml

CAS No.	Compound	Result	RL	MDL	Units	Q
123-91-1	1,4-Dioxane	1.9 U	4.8	1.9	µg/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
4165-60-0	Nitrobenzene-d5	85%		49-119%		
321-60-8	3-Fluorobenzophenyl	70%		45-118%		
1718-51-0	Terphenyl d14	61%		46-135%		

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

I = Result > = MDL, but < RL. J = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SC-24-1838-10X1	Date Sampled:	10/03/05
Lab Sample ID:	F35470-G	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Reyclium, Sarasota, FL		

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	N0007389.D	1	10/13/05	KK	n/a	n/a	VN310

Run #1	Purge Volume
Run #2	5.0 ml

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
67-64-1	Acetone	16.5 U	25	5.0	ug/l	U
71-43-2	Benzene	0.50 U	1.0	0.50	ug/l	
75-27-4	Bromodichloromethane	0.50 U	1.0	0.50	ug/l	
75-29-2	Bromoform	0.50 U	1.0	0.50	ug/l	
108-90-7	Chlorobenzene	0.50 U	1.0	0.50	ug/l	
75-00-3	Chloroethane	1.0 U	2.0	1.0	ug/l	
67-66-3	Chloroform	1.5 U	1.0	0.50	ug/l	
75-15-0	Carbon disulfide	1.0 U	2.0	1.0	ug/l	
36-23-6	Carbon tetrachloride	0.50 U	1.0	0.50	ug/l	
110-82-7	Cyclohexane	0.50 U	1.0	0.50	ug/l	
75-34-3	1,1-Dichloroethane	3.6 U	1.0	0.50	ug/l	
75-35-4	1,1-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
90-12-8	1,2-Dibromo-3-chloropropane	1.0 U	2.0	1.0	ug/l	
106-93-4	1,2-Dibromoethane	0.50 U	1.0	0.50	ug/l	
107-06-2	1,2-Dichloroethane	0.50 U	1.0	0.50	ug/l	
78-87-5	1,2-Dichloropropane	0.50 U	1.0	0.50	ug/l	
124-48-1	Dichlorochloroethane	0.40 U	1.0	0.40	ug/l	
75-71-8	Dichlorodifluoromethane	0.50 U	1.0	0.50	ug/l	
156-59-2	cis-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-01-5	cis-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
541-73-1	m-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
85-50-1	n-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
106-46-7	p-Dichlorobenzene	0.50 U	1.0	0.50	ug/l	
156-60-5	trans-1,2-Dichloroethylene	0.50 U	1.0	0.50	ug/l	
10061-32-6	trans-1,3-Dichloropropene	0.30 U	1.0	0.30	ug/l	
100-41-4	Ethylbenzene	0.50 U	1.0	0.50	ug/l	
76-13-1	1,2-Ethylene	0.60 U	1.0	0.60	ug/l	
591-78-6	2-Hexanone	2.5 U	5.0	2.5	ug/l	
98-82-8	Isopropylbenzene	0.50 U	1.0	0.50	ug/l	
108-10-1	4-Methyl-2-pentanone	2.5 U	5.0	2.5	ug/l	
75-20-9	Methyl Acetate	5.0 U	10	5.0	ug/l	
74-83-9	Methyl bromide	1.0 U	2.0	1.0	ug/l	

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

U = Result <= MDL but > RL. U = Estimated value
 V = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-24-1698-EX1	Date Sampled:	10/03/05
Lab Sample ID:	F35479-6	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Former American Beryllium, Sarasota, FL		

VOA TCL 4.2 List

CAS No.	Compound	Result	RL	MDL	Units	Q
74-87-3	Methyl chloride	1.0 U	2.0	1.0	ug/l	
109-87-2	Methylcyclohexane	0.50 U	1.0	0.50	ug/l	
75-09-2	Methylene chloride	1.0 U	5.0	1.0	ug/l	
78-03-3	Methyl ethyl ketone	2.5 U	5.0	2.5	ug/l	
1634-04-4	Methyl Tert Butyl Ether	0.50 U	1.0	0.50	ug/l	
100-42-5	Styrene	0.50 U	1.0	0.50	ug/l	
71-55-6	1,1,1-Trichloroethane	0.50 U	1.0	0.50	ug/l	
70-34-5	1,1,2,2-Tetrachloroethane	0.40 U	1.0	0.40	ug/l	
79-00-5	1,1,2-Trichloroethane	0.50 U	1.0	0.50	ug/l	
120-03-1	1,2,4-Trichlorobenzene	0.50 U	1.0	0.50	ug/l	
127-18-4	Tetrachloromethylene	0.50 U	1.0	0.50	ug/l	
108-88-3	Toluene	0.50 U	1.0	0.50	ug/l	
79-01-6	Trichloroethylene	0.50 U	1.0	0.50	ug/l	
75-69-4	Trichlorofluoromethane	0.50 U	2.0	0.50	ug/l	
75-01-4	Vinyl chloride	0.50 U	1.0	0.50	ug/l	
1330-20-7	Xylene (total)	1.0 U	3.0	1.0	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Units
1698-93-7	Dibromofluoromethane	101%		80-115%
17500-87-0	1,2-Dichlorobenzene-D4	101%		73-126%
2037-26-5	Toluene-D8	100%		86-112%
480-00-4	4-Bromofluorobenzene	101%		83-119%

U = Not detected MDL = Method Detection Limit I = Result > = MDL but < RL J = Estimated value
 RL = Reporting Limit V = Indicates analyte found in associated method blank
 L = Indicates value exceeds calibration range N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	SP-24-103B-LXL	Date Sampled:	10/03/05
Lab Sample ID:	F30479-6	Date Received:	10/04/05
Matrix:	AQ - Water	Percent Solids:	n/a
Method:	SW846 8270C, SW846 3510C		
Project:	Former American Recyclinn, Sarasota, FL		

Run #1	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #2	2011911.D	1	10/10/05	NJ	10/07/05	QP14836	SL050

Run #1	Initial Volume	Final Volume
Run #2	1040 ml	1.0 ml

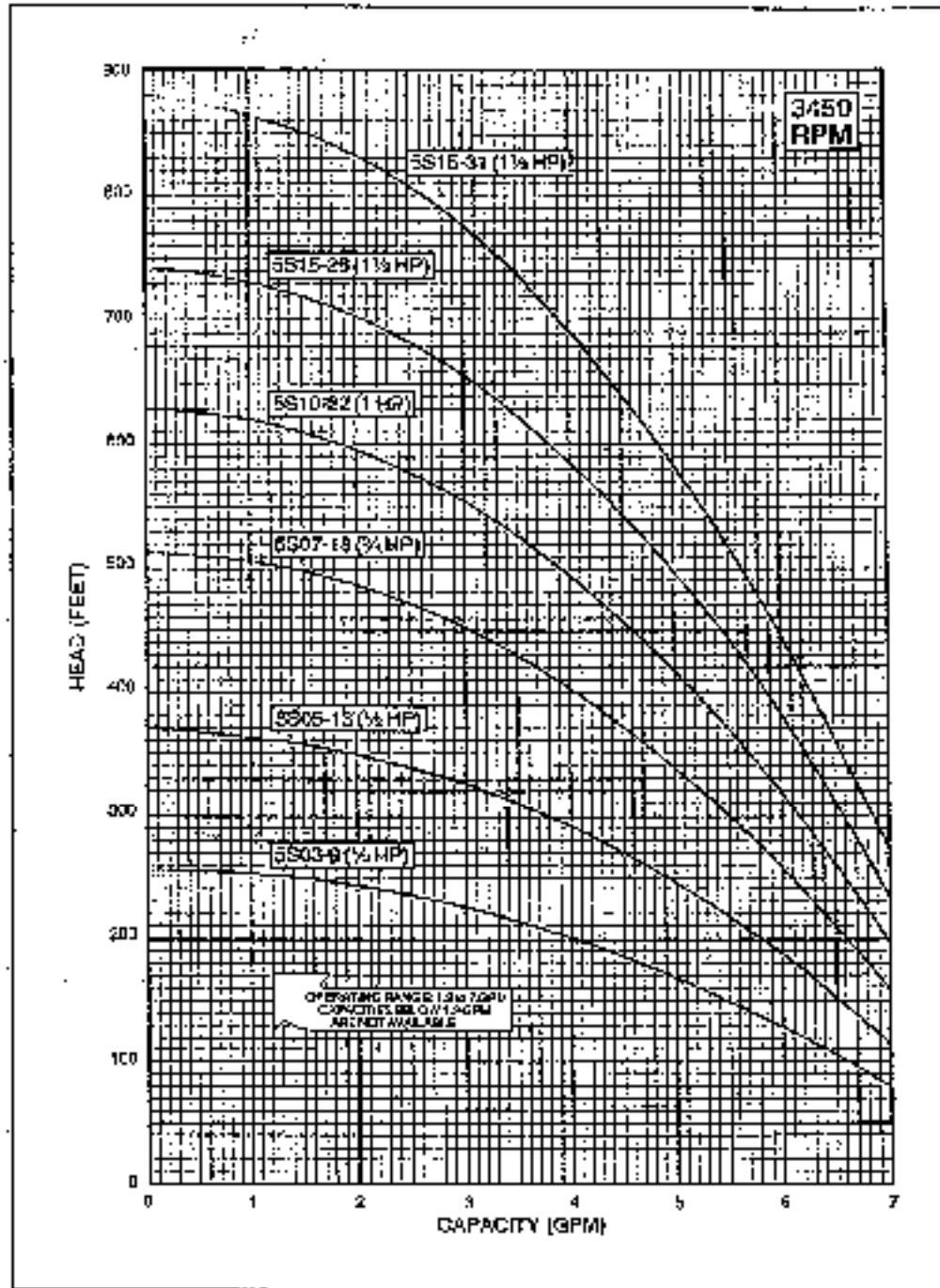
CAS No.	Compound	Result	RI	MDL	Units	Q
123-91-1	1,4-Dioxane	1.9 U	4.8	1.0	ug/l	
CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits		
4165-60-0	Nitrobenzene d5	74%		19-110%		
321-60-8	2-Fluorobiphenyl	70%		45-118%		
1718-51-0	Terphenyl-d14	61%		48-135%		

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 L = Indicates value exceeds calibration range

V = Result > = MDL, but < RL J = Estimated value
 V = Indicates analyte found in associated method file
 N = Indicates presumptive evidence of a compound

Appendix D

Design Data

**MODEL
5S****5 GPM****GRUNDFOS**FLOW RANGE
1.2 to 7 GPMPUMP OUTLET
1" NPT**PERFORMANCE CURVES****DIMENSIONS AND WEIGHTS**

MODEL NO.	HP	LENGTH (INCHES)	WIDTH (INCHES)	APPROX. UNIT SHIPPING WT. (LBS.)
5S03-9	1/4	24 3/4	3 1/8	27
5S05-13	1/2	28 1/2	3 1/8	31
5S07-18	3/4	33 1/4	3 1/8	34
5S10-22	1	37 1/8	3 1/8	42
5S15-26	1 1/2	42	3 1/8	49
5S15-31	1 1/2	47 3/4	3 1/8	59

Specifications are subject to change without notice.

GRUNDFOS

5 GPM

MODEL 5S

PERFORMANCE CHARTS

FLOW RANGE
1.2 to 7 GPM

PUMP OUTLET
1" NPT

(Ratings are in GALLONS PER HOUR - GPH)

DEPTH TO PUMPING WATER LEVEL (LIFT) IN FEET

PUMP MODEL	HP	PSI	DEPTH TO PUMPING WATER LEVEL (LIFT) IN FEET																								
			20	40	60	80	100	120	140	160	180	200	220	240	260	280	300	340	400	460	520	600	680	800	1000	1100	
5S03-9	1/8	0				428	401	374	347	320	293	266	239	212	185	158	131	104	77	50	23	0					
		20		420	393	366	339	312	285	258	231	204	177	150	123	96	69	42	15	0							
		30		389	362	335	308	281	254	227	200	173	146	119	92	65	38	11	0								
		40	470	359	330	300	270	240	210	180	150	120	90	60	30	0											
		50	359	327	297	267	237	207	177	147	117	87	57	27	0												
		60	337	294	253	211	169	127	85	43	0																
Start PSI:			232	184	135	86	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5S05-13	1/8	0					425	400	375	350	325	300	275	250	225	200	175	150	125	100	75	50	25	0			
		20			437	416	395	373	350	327	304	281	258	235	212	189	166	143	120	97	74	51	28	0			
		30		434	415	396	377	358	338	318	298	278	258	238	218	198	178	158	138	118	98	78	58	38	0		
		40	421	412	393	376	359	342	325	308	291	274	257	240	223	206	189	172	155	138	121	104	87	70	53	0	
		50	408	390	372	353	335	316	297	279	261	243	225	207	189	171	153	135	117	99	81	63	45	27	0		
		60	388	369	350	332	312	292	272	252	232	212	192	172	152	132	112	92	72	52	32	12	0				
Start PSI:			157	143	134	126	117	108	100	91	82	74	65	56	48	39	30	21	12	0	0	0	0	0	0		
5S07-18	3/8	0						423	400	377	354	331	308	285	262	239	216	193	170	147	124	101	78	55	32		
		20						421	407	384	361	338	315	292	269	246	223	200	177	154	131	108	85	62	39		
		30								421	407	384	361	338	315	292	269	246	223	200	177	154	131	108	85		
		40			432	418	405	392	378	365	351	337	323	309	295	281	267	253	239	225	211	197	183	169	155		
		50		430	417	403	389	376	362	348	334	320	306	292	278	264	250	236	222	208	194	180	166	152	138		
		60	428	415	401	388	374	361	347	334	320	307	293	279	265	251	237	223	209	195	181	167	153	139	125		
Start PSI:			213	204	195	187	177	167	157	147	137	126	115	104	93	82	71	60	49	38	27	16	0	0			
5S10-22	1	0							423	412	401	390	379	368	357	346	335	324	313	302	291	280	269	258			
		20							421	410	399	388	377	366	355	344	333	322	311	300	289	278	267	256			
		30									421	410	399	388	377	366	355	344	333	322	311	300	289	278			
		40				429	418	407	396	385	374	363	352	341	330	319	308	297	286	275	264	253	242	231			
		50		427	416	405	394	383	372	361	350	339	328	317	306	295	284	273	262	251	240	229	218	207			
		60	425	414	403	392	381	370	359	348	337	326	315	304	293	282	271	260	249	238	227	216	205	194			
Start PSI:			245	237	228	219	211	202	193	184	175	166	157	148	139	130	121	112	103	94	85	76	67				
5S15-26	1 1/2	0								427	416	406	395	384	373	362	351	340	329	318	307	296	285	274			
		20								425	414	404	393	382	371	360	349	338	327	316	305	294	283	272			
		30										425	414	404	393	382	371	360	349	338	327	316	305	294			
		40								422	412	402	391	380	369	358	347	336	325	314	303	292	281	270			
		50		420	411	401	390	379	368	357	346	335	324	313	302	291	280	269	258	247	236	225	214	203			
		60	419	409	400	389	378	367	356	345	334	323	312	301	290	279	268	257	246	235	224	213	202	191			
Start PSI:			260	252	243	234	225	216	207	198	189	180	171	162	153	144	135	126	117	108	99	90	81				
5S15-31	1 1/2	0									425	417	411	403	395	387	379	371	363	355	347	339	331	323			
		20									421	413	405	396	388	380	372	364	356	348	340	332	324	316			
		30											421	413	405	396	388	380	372	364	356	348	340	332			
		40										420	412	404	395	387	379	371	363	355	347	339	331	323			
		50									417	410	401	392	383	374	365	356	347	338	329	320	311	302			
		60	416	410	401	392	383	374	365	356	347	338	329	320	311	302	293	284	275	266	257	248	239	230			
Start PSI:			320	311	302	294	285	277	268	259	251	242	233	224	215	206	197	188	179	170	161	152	143				

SUBJECT Former ABC Site - USAS Well Pumps	PROJ. NO.	BY DMS	DATE 12/9/05	SHEET 1
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CALCS. BY _____ ; DATE _____ CHECKED BY _____ ; DATE _____

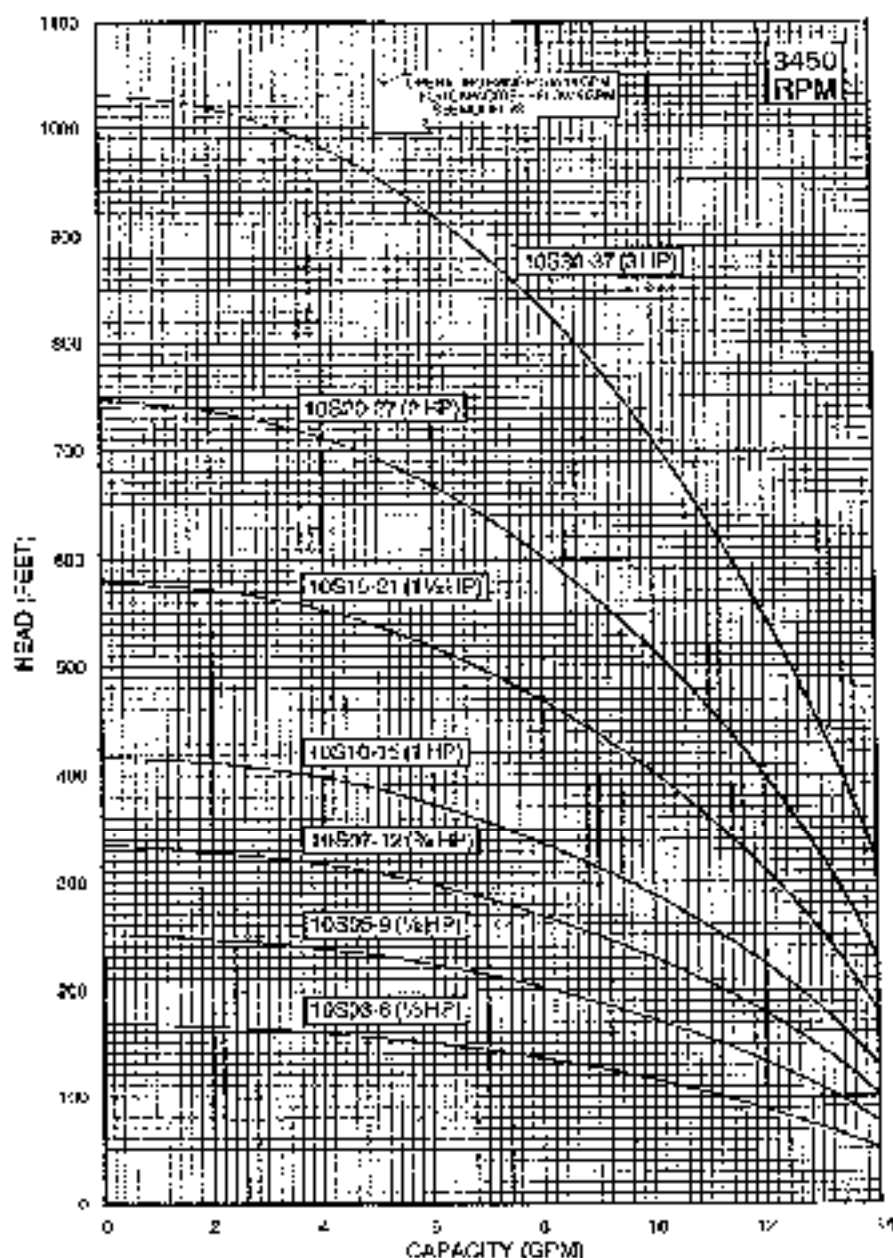
Down Well Extraction Pump

- a) pumping rate = 5 gpm
- b) discharge pipe size = 2" sch 80 PVC
- c) friction loss = 0.10 psi / 100' 2" pipe
- d) $\Delta H = 40'$ (depth of pump inlet to top of influent tank)
- e) straight pipe run = 300'
- f) # 90° elbows = $5 \times 5' = 25'$
- g) # check valves = $1 \times 17' = 17'$
- h) # ball valves = $1 \times 50' = 50'$
- i) Total pipe run including fittings/valves = 392'

$$\text{Total friction loss} = \frac{0.10 \text{ psi}}{100 \text{ feet}} \times 392' = 0.392 \text{ psi}$$

or
0.90' of H₂O

$$\text{T.D.H. required} = 40' + 0.90 = 40.9'$$

**MODEL
10S****10 GPM****GRUNDFOS**FLOW RANGE
5 to 14 GPMPUMP OUTLET
1 1/4" NPT**PERFORMANCE CURVES****DIMENSIONS AND WEIGHTS**

MODEL NO.	HP	LENGTH (INCHES)	WIDTH (INCHES)	APPROX. UNIT SHIPPING WT. (LBS.)
→ 10S03-6	1/3	22	3 1/4	26
10S05-8	1/2	25 1/2	3 1/4	29
10S07-12	3/4	28 1/4	3 1/4	33
10S10-15	1	31 1/4	3 1/4	34
10S15-21	1 1/2	37 1/8	3 1/4	44
10S20-27	2	42	3 1/4	49
10S30-37	3	57 3/8	3 1/4	63

Specifications are subject to change without notice.

SELECTION CHARTS

(Ratings are in GALLONS PER HOUR - GPH)

FLOW RANGE
5 to 14 GPM

PUMP OUTLET
1 1/4" NPT

PUMP MODEL	HP	PSI	DEPTH TO PUMPING WATER LEVEL (LIFT) IN FEET																																
			21	40	58	84	100	120	140	160	180	200	220	240	260	280	300	340	400	460	520	600	700	800	904	1000	1100								
10S03-B	1/8	4	388	311	278	255	238	224	212	200	188	176	164	152	140	128	116	104	92	80	68	56	44	32	20	8									
		20	347	270	237	214	197	183	171	159	147	135	123	111	99	87	75	63	51	39	27	15	3												
		30	321	244	211	188	171	159	147	135	123	111	99	87	75	63	51	39	27	15	3														
		45	295	218	185	162	145	133	121	109	97	85	73	61	49	37	25	13	1																
		55	269	192	159	136	119	107	95	83	71	59	47	35	23	11																			
		65	243	166	133	110	93	81	69	57	45	33	21	9																					
Shut-off PSI:		64	55	41	30	22	21	12	8																										
10S05-9	1/2	0																																	
		21	612	535	492	469	452	435	418	401	384	367	350	333	316	299	282	265	248	231	214	197	180	163	146	129	112	95	78	61	44	27			
		30	586	509	466	443	426	409	392	375	358	341	324	307	290	273	256	239	222	205	188	171	154	137	120	103	86	69	52	35	18	1			
		45	560	483	440	417	400	383	366	349	332	315	298	281	264	247	230	213	196	179	162	145	128	111	94	77	60	43	26	9					
		55	534	457	414	391	374	357	340	323	306	289	272	255	238	221	204	187	170	153	136	119	102	85	68	51	34	17							
		65	508	431	388	365	348	331	314	297	280	263	246	229	212	195	178	161	144	127	110	93	76	59	42	25	8								
Shut-off PSI:		700	623	580	557	540	523	506	489	472	455	438	421	404	387	370	353	336	319	302	285	268	251	234	217	200	183	166	149	132	115				
10S07-12	3/4	0																																	
		21	712	635	592	569	552	535	518	501	484	467	450	433	416	399	382	365	348	331	314	297	280	263	246	229	212	195	178	161	144	127			
		30	686	609	566	543	526	509	492	475	458	441	424	407	390	373	356	339	322	305	288	271	254	237	220	203	186	169	152	135	118	101	84		
		45	660	583	540	517	500	483	466	449	432	415	398	381	364	347	330	313	296	279	262	245	228	211	194	177	160	143	126	109	92	75	58		
		55	634	557	514	491	474	457	440	423	406	389	372	355	338	321	304	287	270	253	236	219	202	185	168	151	134	117	100	83	66	49	32		
		65	608	531	488	465	448	431	414	397	380	363	346	329	312	295	278	261	244	227	210	193	176	159	142	125	108	91	74	57	40	23	6		
Shut-off PSI:		127	109	100	111	103	94	85	77	68	59	51	42	33	25	16																			
10S10-15	1	0																																	
		21	812	735	692	669	652	635	618	601	584	567	550	533	516	499	482	465	448	431	414	397	380	363	346	329	312	295	278	261	244	227			
		30	786	709	666	643	626	609	592	575	558	541	524	507	490	473	456	439	422	405	388	371	354	337	320	303	286	269	252	235	218	201	184	167	
		45	760	683	640	617	600	583	566	549	532	515	498	481	464	447	430	413	396	379	362	345	328	311	294	277	260	243	226	209	192	175	158	141	
		55	734	657	614	591	574	557	540	523	506	489	472	455	438	421	404	387	370	353	336	319	302	285	268	251	234	217	200	183	166	149	132	115	
		65	708	631	588	565	548	531	514	497	480	463	446	429	412	395	378	361	344	327	310	293	276	259	242	225	208	191	174	157	140	123	106	89	
Shut-off PSI:		174	156	147	148	139	130	121	112	103	94	85	76	67	58	49	40	31	22	13	4														
10S15-21	1 1/2	0																																	
		21	912	835	792	769	752	735	718	701	684	667	650	633	616	599	582	565	548	531	514	497	480	463	446	429	412	395	378	361	344	327	310		
		30	886	809	766	743	726	709	692	675	658	641	624	607	590	573	556	539	522	505	488	471	454	437	420	403	386	369	352	335	318	301	284	267	
		45	860	783	740	717	700	683	666	649	632	615	598	581	564	547	530	513	496	479	462	445	428	411	394	377	360	343	326	309	292	275	258	241	
		55	834	757	714	691	674	657	640	623	606	589	572	555	538	521	504	487	470	453	436	419	402	385	368	351	334	317	300	283	266	249	232	215	198
		65	808	731	688	665	648	631	614	597	580	563	546	529	512	495	478	461	444	427	410	393	376	359	342	325	308	291	274	257	240	223	206	189	172
Shut-off PSI:		237	229	220	211	203	194	185	177	168	159	151	142	133	125	117	108	99	91	82	73	64	55	46	37	28	19	10	1						
10S20-27	2	0																																	
		21	1012	935	892	869	852	835	818	801	784	767	750	733	716	699	682	665	648	631	614	597	580	563	546	529	512	495	478	461	444	427	410		
		30	986	909	866	843	826	809	792	775	758	741	724	707	690	673	656	639	622	605	588	571	554	537	520	503	486	469	452	435	418	401	384	367	
		45	960	883	840	817	800	783	766	749	732	715	698	681	664	647	630	613	596	579	562	545	528	511	494	477	460	443	426	409	392	375	358	341	324
		55	934	857	814	791	774	757	740	723	706	689	672	655	638	621	604	587	570	553	536	519	502	485	468	451	434	417	400	383	366	349	332	315	298
		65	908	831	788	765	748	731	714	697	680	663	646	629	612	595	578	561	544	527	510	493	476	459	442	425	408	391	374	357	340	323	306	289	272
Shut-off PSI:				286	276	268	259	250	242	233	224	216	207	198	189	181	172	163	154	145	136	127	118	109	100	91	82	73	64	55	46	37			
10S30-37	3	0																																	
		21	1112	1035	992	969	952	935	918	901	884	867	850	833	816	799	782	765	748	731	714	697	680	663	646	629	612	595	578	561	544	527			

SUBJECT	PROJ. NO.	BY	DATE	SHEET
Former ABC Site - 2 SAS Well Pumps		DMC	12/9/05	1

CALCS. BY _____ DATE _____

CHECKED BY _____ DATE _____

Down Well Extraction Pump

- a) Pumping rate: 10 gpm
- b) discharge pipe size: 2" Sch 80 PVC
- c) Friction loss: 0.29 psi / 100' 2" pipe
- d) $\Delta H = 55'$ (depth of pump inlet to top of collection tank)
- e) Straight pipe run = 300'
- f) # 90° elbows = 5 x 5' = 25'
- g) # Check valves = 1 x 17' = 17'
- h) # ball valves = 1 x 50' = 50'
- i) Total pipe run including fittings / valves = 392'

$$\text{Total friction loss} = \frac{0.29 \text{ psi}}{100 \text{ feet}} \times 392' = 1.14 \text{ psi}$$

or
2.6' of H₂O

$$\text{TDH required} = 55' + 2.6' = 57.6'$$

PRODUCT DATA SHEET

March, 2001

FRAC TANK
GENERAL INFORMATION

This tank is sloped downward from working surface at rear of tank to the front. The rear axle is fixed to the tank (permanent).

WEIGHTS AND MEASURES

➤ Capacity:	50000 (21,000 gal.)
➤ Height:	Front: 8'-9", Rear: 12'-9" Handrail up: 13'-8"
➤ Width:	8'-0"
➤ Length:	34'-6" (tank only) 37'-2" (overall)
➤ Weight:	18,000 lbs. (est.)

STRUCTURAL DESIGN

➤ Floor:	Carbon steel
➤ Sides/Ends:	Carbon steel
➤ Top Deck:	Carbon steel
➤ Internal Cross Bracing:	Round stock, 3/4" - 7/8" depending on manufacturer

ACCESSORIES

➤ Manifold:	Some are equipped, some are not
➤ Valves:	Rear: one (1) 4" butterfly valve Front Fill: one (1) 4" butterfly valve Front Manifold: four (4) butterfly valves
➤ Relief Valve:	Standard style: None Safety Vapor style: Blaylock Model L-10, Burst: 1/2 inch, 16 oz. Pressure setting, 0.4 oz. Vacuum setting
➤ Top Access:	One (1) access door
➤ Front Access:	One (1) access door
➤ Side Access:	One (1) access door (passenger's side)

ACCESSORIES - cont.

➤ Guardrail:	At rear platform only
➤ Exterior Ladder:	One (1) at rear of tank
➤ Internal Ladder:	One (1) located at top access door
➤ Front Drain:	One (1) 4" connection
➤ Rear Flush:	One (1) 4" capped nipple
➤ Level Gauge:	None
➤ Rear Wheels:	Fixed axle
➤ Overflow:	One (1) 3" overflow pipe at rear of tank
➤ Vent:	Original design tanks have flip open hatch
➤ Main Rails:	Channel shaped steel

SURFACE DETAILS

➤ Exterior Coating:	Carboline® 134-S (High Gloss Acrylic Aliphatic Polyurethane)*
➤ Interior Coating:	Some tanks are not lined and others are coated with Carboline 137
➤ Safety Paint:	None
➤ Equipment Number:	FSN, FFSS, FTS, FTSS, FTSSSS, FSSSSS, FVSSSS, or F999
➤ Decals:	2- DCLB: Property of Baker Tanks... 2- DCLD01: Danger-Do Not Enter... 2- DCLWD4: Warning-Do Not Move...
➤ Placard Mounts:	None

TESTS/CERTIFICATIONS

➤ Test Performed:	Major repairs hydrotest Substandard Level I, II and III inspections
-------------------	--

To the best of our knowledge the technical data contained herein are true and accurate at the date of issuance and are subject to change without prior notice. No guarantee of accuracy is given or implied because variations can and do exist. NO WARRANTY OR GUARANTEE OF ANY KIND IS MADE BY BAKER TANKS, EITHER EXPRESS OR IMPLIED.

SUBJECT former ABC Site - Influent TANK	PROJ. NO.	BY DMS	DATE 12/8/05	SHEET 1
--	-----------	-----------	-----------------	------------

CALCS. BY _____ ; DATE _____ CHECKED BY _____ ; DATE _____

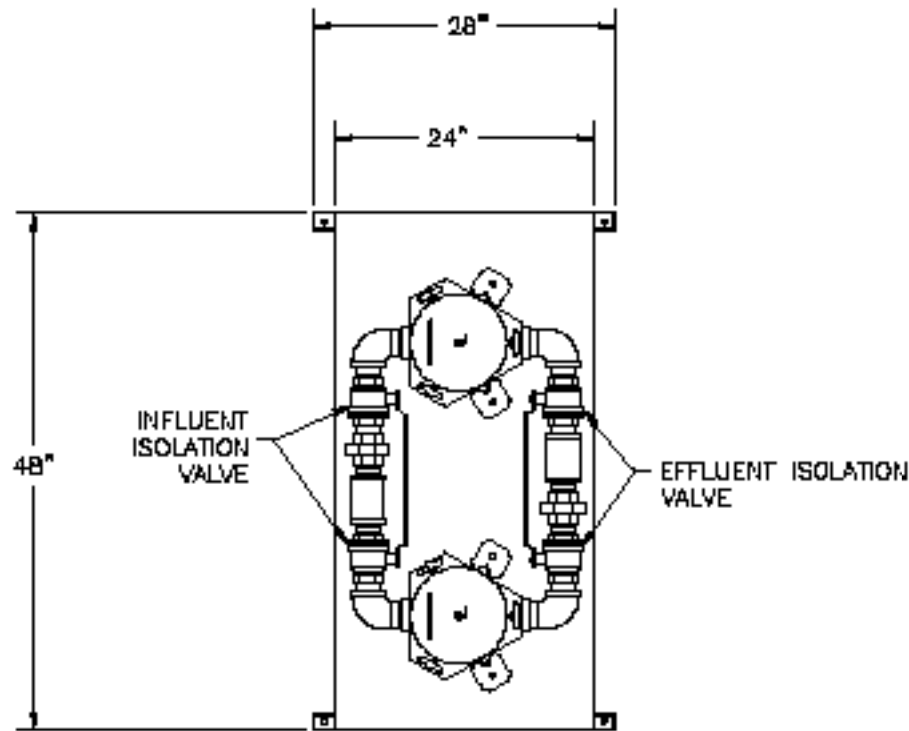
50 gpm Influent flowrate

Baker Frac TANK = 21,000 gallons

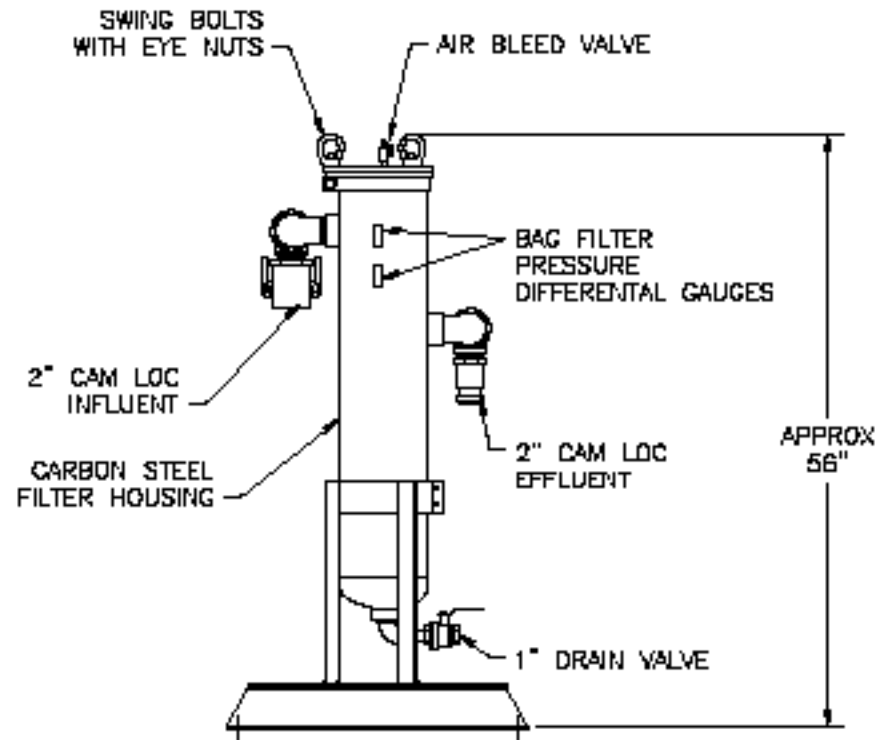
$$\frac{21,000 \text{ gallons}}{50 \text{ gallons/min}} = 420 \text{ min (hr)}$$

Retention Time

REVISIONS			
REV	NO	DESCRIPTION	DATE
-	-	-	-



PLAN VIEW

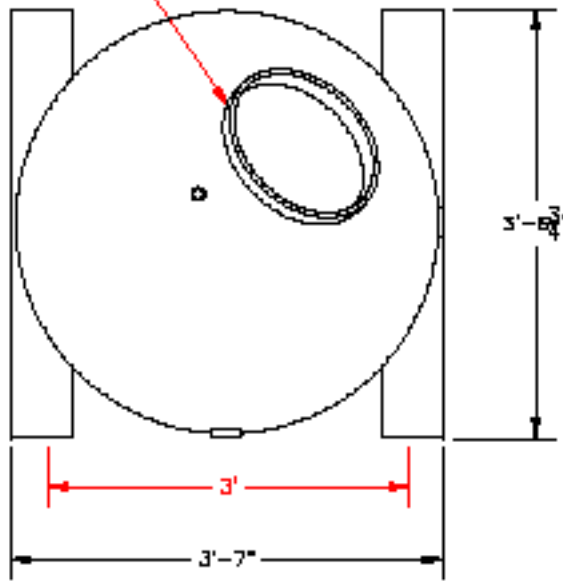


ELEVATION VIEW

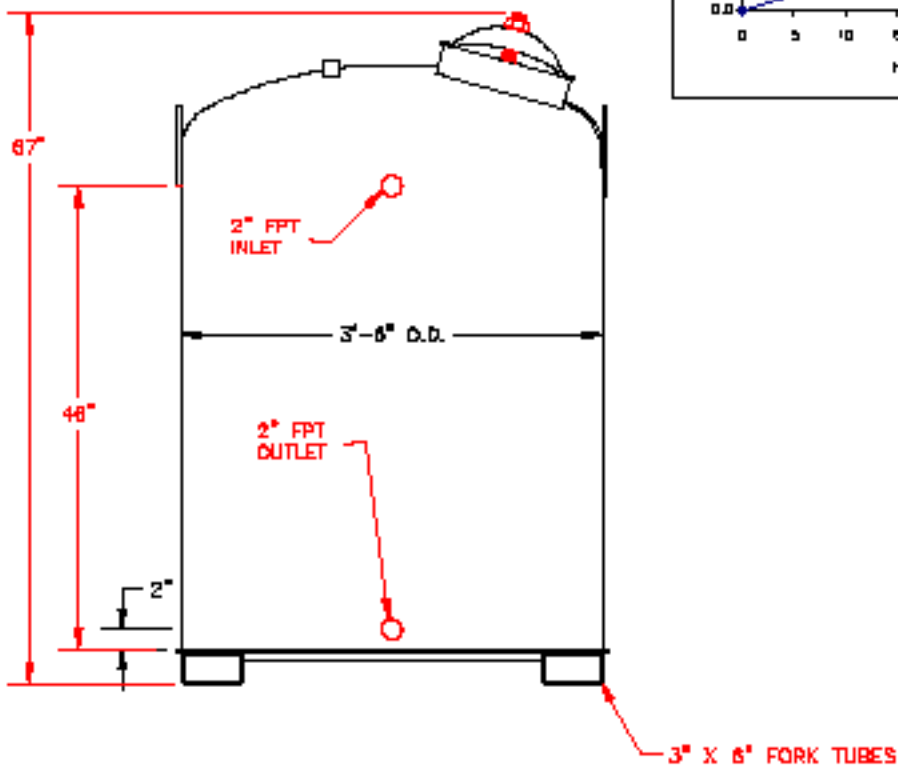
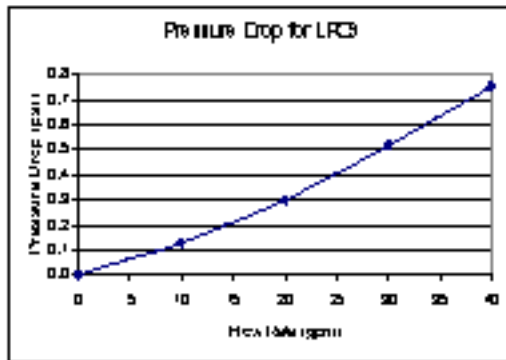
		CARBONAIR <small>WATER AND WASTE MANAGEMENT EQUIPMENT RENTALS</small>	
TITLE 48" x 24" BAG FILTER SKID RENTAL SKID		PLOT # 215646	
SHEET NO. 1		OF 1	
DATE 1-13		DRAWN BY 1	

**Carbon Adsorber – Liquid Phase
LPC-9**

12" X 18" MANWAY



PLAN VIEW



ELEVATION

Sales Drawing #188435

02/18/05

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Photo-Cat Water Treatment

Advanced, Chemical-Free Process:

Photo-Cat destroys organic contaminants in water through a patented TiO_2 slurry-based photocatalytic process to purify or detoxify the fluid stream of concern. The process is fully automated, sealed, generates no waste stream, and is fully backed by our World Wide Support Program.

Photo-Cat lifecycle costs are significantly less than conventional technologies such as activated carbon, UV ozone, UV peroxide, chemical oxidation, air stripping with off-gas treatment, and reverse osmosis, making Photo-Cat the economical choice for multi-year projects.

This highly automated process can treat water to very high standards that significantly exceed drinking water standards. Photo-Cat is essentially a solid state, automated device that operates unattended, with lamp life and service intervals exceeding 18,000 hours. The modular design facilitates adaptation to increasingly stringent environmental standards and treatment requirements.

Purifics is the world's only producer of commercial & industrial photocatalytic systems.

Applications:

- Groundwater Remediation
- Potable Water
- Bilge and Ballast Water
- Industrial Process Wastewater
- High Purity Water
- Anatomical Waste
- Exhaust Air Emissions
- Disinfection & Sterilization
- Soil Washing

Models

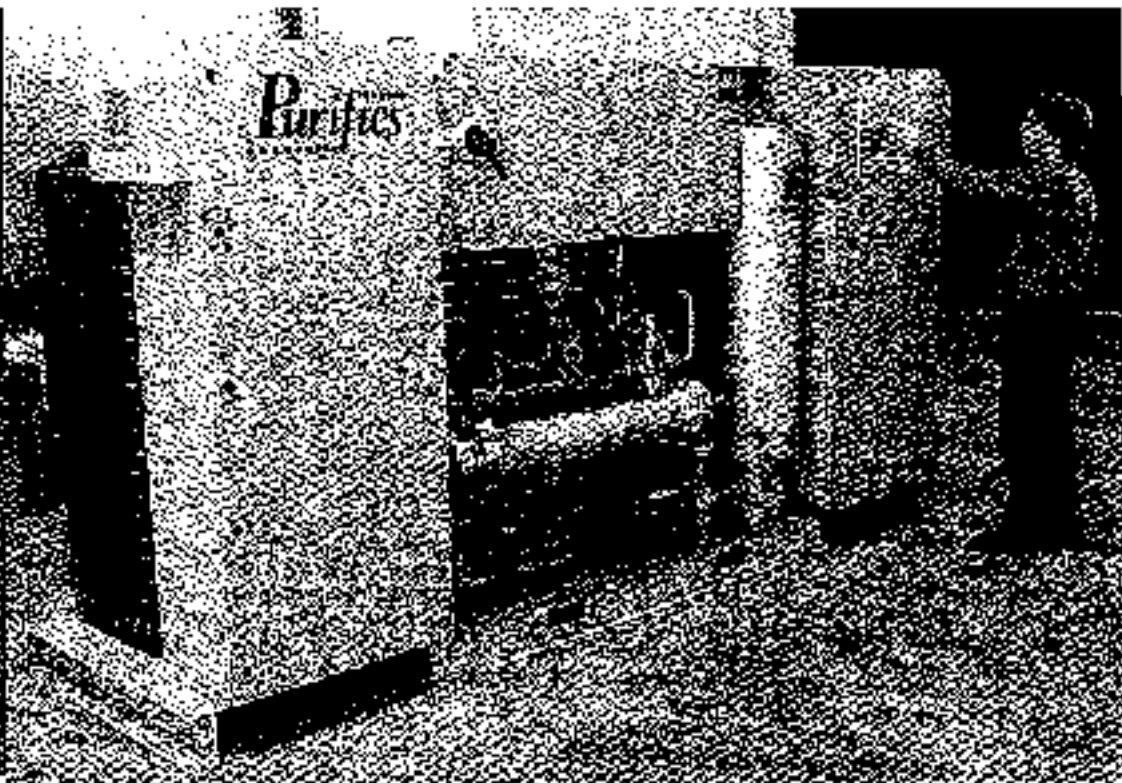
Photo-Cat RI:
Remediation & Industrial

Photo-Cat NM:
Nuclear & Military

Photo-Cat HF:
High Flow

Photo-Cat A:
Air Treatment

Photo-Cat L:
Laboratory & Research



Engineering Purity - Eliminating Your Problem

Features & Benefits:

Efficient	<ul style="list-style-type: none"> Low lifecycle cost - approx. 1/4 the O&M of other AOPs. Long lamp life - 18,000 hrs between service periods. Quick lamp changes - 1 min. w/ flooded system. No catalyst loss - continuously recovers catalyst. Continuous 24/7 duty. 	Automated	<ul style="list-style-type: none"> Unattended operation. Computer/PLC programmed operation. Digital service and training manual online. Remote monitoring, control, and data logging. Automatic fault detection and recovery. Smart supports.
Ability to Treat	<ul style="list-style-type: none"> Insensitive to dissolved solids and opaque fluids. Not inhibited by turbidity or pH levels. Not affected by pressure, temperature, alkalinity. No fothing - operates with water containing iron. Advanced coalescer technology. 	Serviceability	<ul style="list-style-type: none"> Generic parts, easy service availability. No quartz tube wipers or quartz tube service. Service can be performed by end users' staff and trades.
Manufacturing Excellence	<ul style="list-style-type: none"> Corrosion resistant. High grade stainless steel construction. NEMA 4 rating. One day installations. Highly reliable using highly developed standard off-the-shelf components. 	Design Benefits	<ul style="list-style-type: none"> Created for sustainable development. 25 year life expectancy. Modular design customized to client requirements. No pre-treatment required for removal of metals, dissolved solids or turbidity. Easily expanded / reduced for application variability.
Small Footprint	<ul style="list-style-type: none"> Starting at 3.6m L x 1.02m W x 1.08m H (11'10" L x 3'4" W x 8'6" H). Palletized for convenience. 	High Compliance Factor	<ul style="list-style-type: none"> Established compliance history of regulated discharge spanning 10 years.
Community Acceptance	<ul style="list-style-type: none"> Extremely low noise. No off-gas. No waste generated. 	Permitted Installations	<ul style="list-style-type: none"> History of efficient permitting by regulators such as the EPA and MOE for surface water discharge.
Chemical Free	<ul style="list-style-type: none"> Can be operated without H₂O₂ and no ozone. 	High Turn Down Ratios	<ul style="list-style-type: none"> 5% to 100% turn down rates. 5% increments.

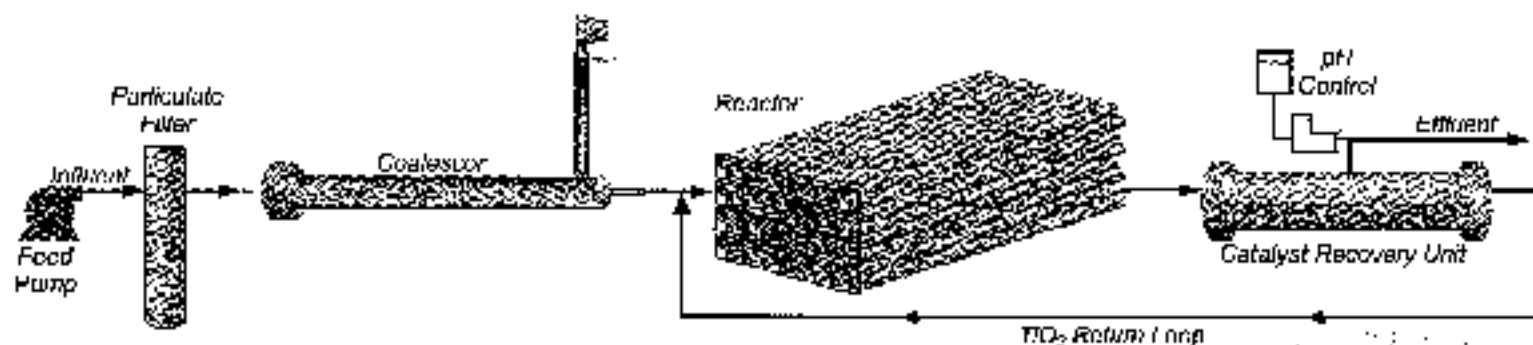


Photo-Cat is a photocatalytic process that destroys organic pollutants when they are mixed with the titanium dioxide slurry and exposed to UV light in the reactor. The reactor is composed of photocatalytic racks linked together in serial and/or parallel mode.

A key element of Purific's photocatalytic process is the patented continuous TiO₂ separation process which allows the catalyst to be completely recaptured and reintroduced into the inlet stream.

WORLDWIDE SUPPORT

provides our customers with responsive technical assistance, after-sale support, and spares.

Purific's
 ES Inc.

340 Sovereign Road, London, ON, Canada, N6M 1A8

Ph: 519.473.5788, info@Purific.com, www.Purific.com

Purific's products are protected by one or more of the following US Patents: #5,452,674 / #5,554,350 / #5,568,078 / #6,156,203 / #6,215,123B1 / #6,988,871B1. Other patents domestic and foreign are pending. Purific's & Photo-Cat are registered trademarks.

PHOTO-CAT CASE HISTORIES

Submitted to:

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December 12, 2005

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Rev. October 20, 2005

EXECUTIVE SUMMARY

This document provides an overview of relevant Photo-Cat equipment installations. The installations have been categorized into groundwater installations, process installations, pending installations and laboratory. Equipment pictures and a brief explanation of the application are provided.

Section 5 shows pictures of various models of Photo-Cat systems installed. For treatment of groundwater at the ABC site, the model of Photo-Cat that has been proposed is shown in Section 5.1.

Additional detail on the Photo-Cat system and why it is selected over competing oxidation technologies is provided in Section 6.

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1 GROUNDWATER

1.1.1 1,4-Dioxane Destruction



Location: Denver, CO USA

Installed: September 2005

Performance:

- * 100 L/min - 10kW Photo-Cat
- * Treats from 150ppb below 3 ppb
- * Groundwater also contains bromide, which the Photo-Cat does not oxidize to bromate
- * Photo-Cat destroys 1,4-dioxane without hydrogen peroxide

1.1.2 Herbicide & VOC Destruction Groundwater



Location: Adelaide, Australia

Installed: September 2005

Performance:

- * Former Herbicide Manufacturing Plant
- * 100L/min - 24/7 Operation
- * 150ppm total contaminants, 99% removal
- * Treated water is reinjected.

1.1.3 1,4-Dioxane Destruction



Location: Denver, CO USA

Installed: September 2003

Performance:

- ✦ Photo-Cat destroys 1,4-dioxane and other chlorinated organics
- ✦ 25kW Photo-Cat system
- ✦ 80 L/min flow rate
- ✦ PLC controlled unmanned operation with remote monitoring, data logging and control
- ✦ Duty 24/7

1.1.4 VOC Destruction - Japan



Location: Tokyo, Japan

Installed: 2003

Performance:

- ✦ Photo-Cat system is leased out for temporary groundwater treatment
- ✦ Contaminants are chlorinated VOCs and dioxins. Treats to levels below detection limit

1.1.5 1,4-Dioxane Destruction



Location: Waterloo, ON Canada

Permit: MOE C. of A. Air: 0711-599J5Q &

Water: 8148-54JULYB

Installed: July 2002

Performance:

- ✦ 1,4-dioxane is easily destroyed by Photo-Cat even though it does not adsorb to carbon, cannot be air stripped and cannot be biologically decomposed
- ✦ Photo-Cat destroys 1,4-dioxane and other chlorinated organics to levels below detection limit
- ✦ Treatment from 10,200 ppb to < 5 ppb
- ✦ 7.2kW Photo-Cat system
- ✦ 8 L/min from 3 wells
- ✦ PLC controlled unmanned operation with remote monitoring, data logging and control
- ✦ Duty 24/7

1.1.6 Groundwater and Collection Trench Off-Gas



Location: London, ON Canada

Installed: 2001

Permit: MOE C. of A. #6235-5A6PJ3

Performance:

- ✦ Site of former coal gasification plant alongside an urban river bank
- ✦ PAH destruction to below detection limits
- ✦ Slugs of NAPL and suspended solids
- ✦ 60 L/min (designed capacity)
- ✦ Housed in two 8-ftx20-ft shipping containers
- ✦ Remotely operated by Purifics: duty 24/7/365
- ✦ Run Time >10,000 hours

1.1.7 Groundwater and Lagoon Waste water



Location: Fort Saskatchewan, AB Canada

Installed: 2000

Permit:

- ✦ TOC removal from 710 ppm to < 50 ppm
- ✦ 2,4-D removal from 391 ppm to < 0.005 ppm
- ✦ Treating high levels of chlorides in the 5,000ppm range

Requirements:

- ✦ Process for sustained automated treatment of water with slugs of oil, 5,000 ppm of chlorides, and wide variations in VOC levels
- ✦ Treating opaque fluids with high salts
- ✦ Unattended operation

1.1.8 PCB Destruction



Location: Newfoundland, Canada

Installed: 1999

Requirements:

- ✦ Modular Photo-Cat system destroying PCBs
- ✦ Remote Operation
- ✦ Unattended operation

1.1.9 Chlorinated VOCs



Location: Ingersoll, ON Canada

Installed: 1998

Permit: MOE C. of A. #4-0140-96-987

Water: 30,000 gal/day from 3 wells

- ✦ Operating costs are \$0.37 per m³
- ✦ Surface water discharge to Thames River
- ✦ Influent water has high levels of oil and grease
- ✦ Key operating parameters are continuously logged onto a computer for compliance purposes
- ✦ Duty 24 hrs/day, 7 days/wk
- ✦ Run Time > 41,000 hours
- ✦ Displaced Carbon Train

1.1.10 Chlorinated Solvents



Location: Toronto, ON

Installed: 1996

Performance:

- ✦ Several horizontal wells, collecting groundwater in a collection trench.
- ✦ Treated groundwater re-injected
- ✦ Autonomous operation
- ✦ 4 gpm
- ✦ Treats contaminants from 200 ppm TOC to < 10ppm

1.1.11 Chlorinated Solvents - Superfund Site: EPA Region VI



Location: Houston, TX USA

Permit: CERCLA ID #TXD980629851

Installed: 1994

Performance:

- * Water treatment from tar pit collection wells, treating chlorinated solvents
- * Eliminated \$ millions in Capital and O&M costs
- * Autonomous operation
- * 4-8 gpm
- * Run Time > 35,000 hours
- * Corrosion resistant
- * Oxygen deprivation design to remove explosion hazard
- * Treats contaminants from 200,000 ppb to < 5 ppb
- * Displaced UV/OX train

2 PROCESS WATER

2.1.1 Aircraft Depainting Fluid Treatment



Location: Edmonton, AB Canada

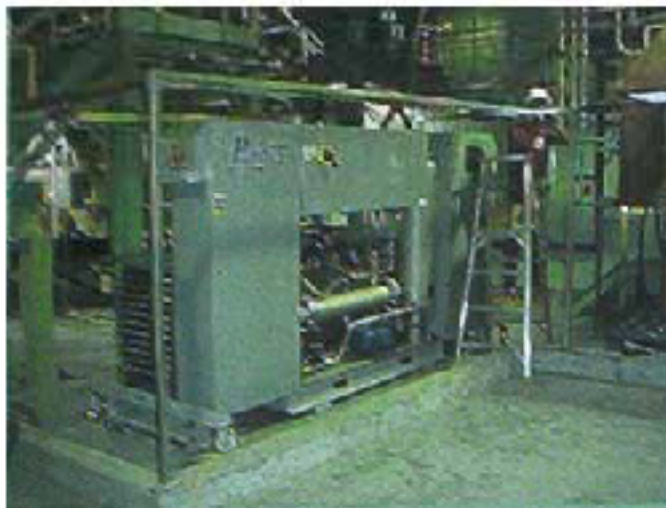
Permit: Not required

Installed: August 2005

Performance:

- * Depainting fluid is easily treated by Photo-Cat even though it is opaque
- * Treatment from 12000 ppm COD to sanitary sewer guidelines
- * 25kW Photo-Cat system
- * 4.5 L/min flow rate
- * PLC controlled unmanned operation with remote monitoring, data logging and control
- * Duty 24/7, on demand

2.1.2 Heavy Water Purification in a Nuclear Application



Location: Halifax, NS Canada

Permit: Not required

Installed: July 2005

Performance:

- * Heavy water treatment
- * Photo-Cat destroys organic contaminants effectively in heavy water
- * Treatment from 1500 ppm TOC to below 25 ppm.
- * 15 kW Photo-Cat system.
- * Chemical free operation.
- * PLC controlled unmanned operation with remote monitoring, data logging and control
- * Duty 24/7
- * This is the second Photo-Cat unit that the client has procured

2.1.3 Pollution Free Plant



Location: DoD Facility, MD, USA

Installed: 2002

Performance:

- ✦ Closed loop air & water reuse process
- ✦ Treatment 53 kg/day of Nitroglycerin and other Resins
- ✦ Identified Best Available Technology
- ✦ Complete process control and energy management
- ✦ 10,000 cfm air regeneration and supply
- ✦ 1,000 gpm water regeneration and supply
- ✦ Nitric Acid Concentration for reuse
- ✦ Chemical free system; no Peroxide
- ✦ State of the Art Design



Sample SCADA Screen

2.1.4 Process Water



Location: Roseville, CA USA

Installed: 1996

Permit: Cal EPA

- * O&M cost is 25% of disposal costs
- * 15 month payback
- * 50 kW Photo-Cat® versus 180 kW UV/H₂O₂ alternative
- * 90% Duty 7 days a week
- * 50 kg/day of organic destroyed

3 PENDING INSTALLATIONS

3.1.1 EPA Superfund Site (Ottati & Goss/Kingston Steel Drum)



Location: Kingston, NH USA

EPA ID#: NHD990717647

To Be Installed: 2006

Performance:

- * TCE, PCE, DCE, VC & 1,4-Dioxane destruction below detection levels.
- * 30gpm
- * Peroxide free operation
- * Photo-Cat selected over UV/peroxide

3.1.2 Treatment of Landfill Leachate



Location: Chester, NS Canada

Site: Kaizer Meadow Landfill, Chester

To Be Installed: Spring 2006

Performance:

- * TOC of 200 ppm treated below 50ppm. Organics consist of chlorinated solvents, PCBs, toluene and phenols.
- * 2 lpm, 24/7 Operation
- * Photo-Cat selected over UV/peroxide???
- * Automated, Remote Operation

4 LABORATORY RESEARCH



4.1.1 Academic Research

Institute: Fanshawe College, London ON: 2005

4.1.2 Advanced Life Support

Institute: University of Florida (Environmental Sciences-Commercial Space Technology Center- ES CSTC): 2004

4.1.3 Detection & Destruction of Toxic Chemicals & Hazardous Biological Matter

Institute: Advanced Concepts and Technologies: 2005

5 PHOTO-CAT MODELS

5.1 DDL Model : 25-50kW



5.2 DL Model : 2.5-25kW



5.3 Photo-Cat L (Laboratory)



5.4 Standards

The Photo-Cat systems are also available in remediation, industrial, nuclear, military, ultra pure and food grade standards. Pressure vessel certification, other North American and European standards are available as well. Photo-Cat system can be engineering to specific client requirements.

6 PRINCIPLES & ADVANTAGES OF THE PHOTO-CAT PURIFICATION PROCESS

Photo-Cat is a flexible purification technology that destroys organic pollutants in water at ambient temperatures and pressures. The technology is a Photocatalytic oxidation and reduction process that utilizes an illuminated or light activated titanium dioxide (TiO₂) slurry catalyst. The Photo-Cat process is similar to other catalytic processes such as the catalytic converter on automobiles. The major difference in TiO₂ Photocatalytic oxidation is that the TiO₂ catalyst uses light energy for activation, rather than heat energy, as is the case with conventional catalyst technologies. Essentially, the only input to the Photocatalytic technology is electric power required to produce the light for catalyst activation.

Photolysis

The Photocatalytic process should not be confused with UV/H₂O₂ or UV/O₃, which are photolytic processes. Photolytic technologies generate hydroxyl radicals by using high energy photons to cleave the peroxide molecule: $H_2O_2 + UV \rightarrow 2 \cdot OH$. The efficiency of this type of process is greatly reduced by the fact that in the range of 75% of the $\cdot OH$ recombine back to H₂O₂ without accomplishing any work. Photolytic technologies typically use medium or high pressure lamps to generate the photons. Photolysis can also photolyze organic compounds directly, and can create random intermediates. Random intermediates are a concern.

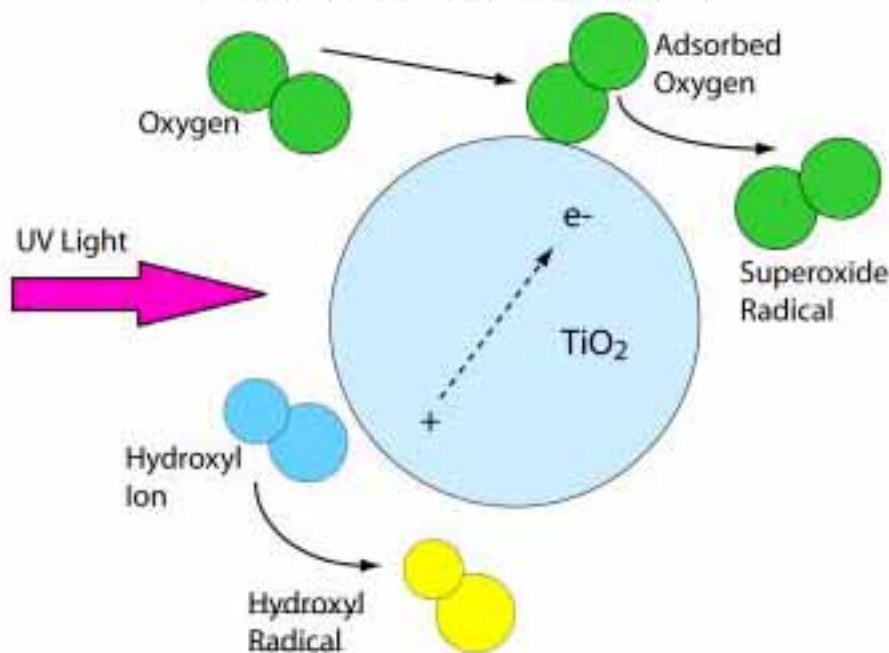
TiO₂ Photocatalysis

TiO₂ Photocatalysis uses the full spectrum of ultraviolet light to activate the TiO₂ catalyst as opposed to the photons cleaving chemical bonds. The UV light photo-generates electrons into the conduction band of the catalyst semiconductor and positive "holes" at the surface of the TiO₂. When this occurs, the catalyst is in an activated state and four organic destruction pathways exist (both oxidative and reductive) as listed below.

- 1 & 2) The most typical oxidative pathway involves the reduction of oxygen, creating the superoxide radical. Subsequently, a water molecule or hydroxyl ion is oxidized at the positive hole and creates a hydroxyl radical. Both radicals, which are generated with one photon of light, readily oxidize the organic contaminants. Refer to the Aqueous Phase Photochemistry diagram below in Figure 1.
- 3) A third oxidative pathway is oxidation of the adsorbed organic contaminant directly at the photo-generated hole. The oxidative power of the photo-generated hole is about 15% stronger than the hydroxyl radical.
- 4) The last degradative pathway is a reductive pathway via reduction by the conduction band electron. This degradative pathway is very efficient at

destroying refractive organic contaminants that are resistant to the hydroxyl radical attack. An example of this treatment mode is the photocatalytic reduction of 1,3,5-trinitrobenzene (TNB) in the remediation of TNT contaminated water.

Figure 1: Aqueous Phase Photochemistry



In all four degradation pathways listed above, organic contaminants are destroyed on the surface of the TiO_2 . The light energy is used only as an energy source for catalyst activation. Consequently, photocatalytic by-products are controlled and consistent because the degradative pathways do not create organic radicals.

Table 1 lists the oxidative strength of various radicals and oxidizing species

Table 1: Relative Oxidizing Power Versus Various Oxidizing Species

Oxidizing Species	Relative Power
Photo-Generated Hole on TiO₂ *	2.35
Fluorine	2.23
Hydroxyl Radical *	2.05
Atomic Oxygen	1.78
Ozone	1.52
Hydrogen Peroxide	1.31
Permanganate	1.24
Hypochlorous Acid	1.10
Chlorine	1.00

*Oxidizing Species Generated by Photo-Cat

This table is important to illustrate why Photo-Cat is the most aggressive technology for oxidizing organic contaminants, and the lowest cost solution.

Principles of Photo-Cat Operation - Understanding the Differences Between UV/H₂O₂

Since the Photo-Cat, TiO₂ slurry based photocatalytic technology creates hydroxyl radicals; it is referred to as an advanced oxidation process (AOP). Based on this generic classification, it is wrongly assumed that Photo-Cat suffers from the same problems and shortcomings of Photolysis technologies such as UV/peroxide.

The biggest difference between these two technologies is in the way radicals are generated. The Photo-Cat uses a light-activated TiO₂ catalyst to generate radicals, and the powerful photocatalytic positive hole. These oxidizing species are the first and third strongest oxidizing species. The catalyst reduces the activation energy required to generate the radicals, thus reducing energy requirements. Unlike UV/peroxide, which requires photons with sufficient energy to break chemical bonds, Photo-Cat only requires photons at a wavelength of less than 388nm capable of exciting electrons. This provides a high degree of freedom in selecting UV sources for the Photo-Cat, and allows Purifics to utilize the highest efficiency lamps, with the greatest lamp life (41% efficient with over 18,000 hour life).

In the Photo-Cat process, essentially all of the UV light is absorbed by the photocatalyst and is absorbed at the surface of the quartz-water interface.

Photolysis reactions are eliminated, along with the issues associated with the production of random intermediates. The Photo-Cat system does not rely on transmittance of photons through the water. This makes the Photo-Cat process completely impervious to any type of absorbance issues, such as turbidity, high TDS, or colour. This ability also reduces complexity by eliminating pre-treatment, and provides greater overall efficiency. Unlike traditional UV/peroxide technologies which operate in laminar flow regimes, the Photo-Cat reactor is highly turbulent (Re as high as 40,000), which provides maximum mass transfer of contaminant, TiO_2 and photons, providing optimum destruction efficiency.

The high mixing rates obtained in the Photo-Cat reactor coupled with the honing ability of the TiO_2 catalyst eliminates any fouling mechanisms on the quartz sleeves of the reactor. Thus, no wiper mechanisms are required, hence eliminating any cleaning requirements during the life of the system. The elimination of UV-quartz wipers reduces system complexity, cost, and the potential for a failure.

TiO_2 Photocatalysis: Slurry Vs Fixed

Photo-Cat is a process that uses the TiO_2 in a slurry form, and then effectively recovers 100% of the slurry in a continuous process. Other TiO_2 processes have experimented with an immobilized or fixed TiO_2 . Technically this process works but its commercial viability is very limited. Fixed TiO_2 processes have unsolved issues for bonding, fouling, masking, mass transfer, and photon efficiency that at best give them an order of magnitude poorer performance than slurry photocatalysis, with limited duration.

Photo-Cat Materials of Construction

The Photo-Cat is constructed of quartz glass, high grade stainless steel, ceramic, gaskets and electronics. Fabrication standards meet or exceed client's requirements. With the exception of a few valves and pumps it is essentially a solid state device. The result is a system that does not leach or corrode, with high reliability and proven durability in high cycle operations or sustained 24/7 duty.

About Lamps

The Photo-Cat utilizes a high efficiency low pressure mercury lamp as the light source to excite the TiO_2 . The catalyst is able to use the full spectrum of the lamp from 360nm to 185nm. This provides us with a lamp efficiency of 41% UV output. In addition the lamp has been developed with a long life capability to operate reliably and durably from just above the freezing point of water to elevated ambient temperatures >40C for a period of 18,000 hrs with less than 30% degradation.

Oxidation without Hydrogen Peroxide or Ozone

Photo-Cat utilizes dissolved oxygen to generate radicals. **No hydrogen peroxide or ozone is required** in the process. Consequently most Photo-Cat installations are installed without the need for chemical oxidants.

Eliminating the need for hydrogen peroxide is extremely important for drinking water applications. First there is a real cost (avoidance) saving related to the elimination of hydrogen peroxide. Typical dosages for UV/peroxide systems in drinking water can range from 5-50ppm, and have to be added in excess. Typical peroxide consumption is very low, consequently, the majority of the peroxide is wasted and must be removed downstream (this creates additional cost and complexity). Finally, there are undesirable **stabilizer compounds** (both inorganic and organic) **in the peroxide**, which are very resistance to oxidation. Typical organic stabilizer compounds can be 8-hydroxyquinoline, pyridine carboxylic acids, tartaric and benzoic acids, and acetanilide and acetophenetidin compounds. Similarly, 1,4-dioxane was a stabilizer used in chlorinated degreasing agents

The Proof is in the Test

It is not a sound practise to categorically generalize the performance of treatment technologies individually or collectively. This is due to the fact that the characteristic parameters of wastewater dramatically impact the kinetics of the contaminants of concern, hence the selection of the appropriate treatment technology. Another common oversight is the absence of considering the "total cost" of the solution. Frequently, only the AOP cost is incorrectly taken into consideration on an "apples to apples" basis, which is grossly misleading. For example, the total cost of a UV/peroxide system is comprised of the following: the AOP, O&M, pre-treatment, lamp allocation, service contracts, scheduled maintenance, etc. If the total costs of all technology solution options are calculated in this manner, a fair and objective comparison is more likely to result.

The ultimate proof results from testing the actual water of concern so a comparison of the overall system efficiency can be performed. It is also prudent to fully understand the true O&M cost structure beyond simple power and chemical usage.

Summary

The Photo-Cat technology provides much greater degrees of freedom in comparison to UV/peroxide technologies: elimination of H₂O₂, no UV-quartz wipers, use of highest efficiency and longest life lamp, greatest mass transfer reactor for optimal organic destruction, reduced energy requirements by catalytic radical formation, two radicals generated per photon of energy, and no effects of UV absorption. **The net effect is a 3:1 operating cost advantage of Photo-Cat versus UV/peroxide technologies.** Throughout Purifics' twelve years of existence, the Photo-Cat

technology has routinely demonstrated this level of cost advantage over competing UV/peroxide technologies.