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Having been involved with some of the previous cleanup projects on this site, I have concern that the preferred cleanup alternative will be more challenging and therefor cost considerably more than identified in the report (more than the \$18M figure).

The foundation structures, piling, pile caps, grade beams, tank pads, etc are extensive. All these concrete structures and piling would need to be demolished and removed from the site prior to any in-situ treatment. The demolition would require extensive excavation in order to access the structures to be demolished as some of the large pile caps are several feet below existing grade. Many structures are not well documented (some not being documented at all) and without performing a full excavation, there would be a great risk of sending an in-situ treatment auger into a legacy foundation or piling and damaging the specialty auger, or at best delaying the project while the obstruction is cleared. In either instance, the project would likely be riddled with expensive change orders due to unforeseen conditions encountered while auguring, thus driving the price much higher than advertised.

Since many of the concrete foundations and pilings must be excavated down to the aquatard in order to be demolished and removed, it makes sense to treat the already excavated soil and place the treated soil back on the site. Placing contaminated soil (that has been previously excavated during the demolition phase) back into the excavation seems risky as the contaminant of concern, mercury, will migrate downward as the soil is being excavated and backfilled. It would be far less risky to excavate the site in a conventional manner in order to perform the demolition, send soil through an on-site treatment plant and place the treated soil back into the ground (since the excavated soil will be considered "generated" while performing the excavations required for demolition).

If the aquatard must be protected to contain the contaminants, the auguring / in-situ treatment method seems to have the highest risk of accidentally breaching the aquatard. There will be no way to see what material is being augured through and the operation will have to rely on approximated depths deduced from bore logs, which can be inaccurate.

Again, the concern is that the preferred alternative will cost far more than anticipated due to complications / challenges presented by this site.