

1 **ANALYSIS OF DNAPL SOURCE DEPLETION COSTS AT 36 FIELD SITES**

2
3 James M. McDade, Travis M. McGuire, and Charles J. Newell
4 Groundwater Services, Inc., 2211 Norfolk, Suite 1000, Houston, TX 77098
5

6 **ABSTRACT**

7 A recent U.S. Environmental Protection Agency expert panel on dense non-aqueous
8 phase liquid (DNAPL) remediation concluded that uncertainty in the costs and benefits of
9 applying source depletion technologies (i.e., active remediation in source zones) is one
10 key factor that discourages widespread use of these technologies at DNAPL sites
11 (Kavanaugh et al., 2003). To reduce this uncertainty, a detailed evaluation of
12 remediation costs for four active source depletion technologies was conducted. The
13 source depletion technologies evaluated were enhanced bioremediation, chemical
14 oxidation, surfactant/cosolvent flushing, and thermal treatments. An extensive review of
15 peer-reviewed literature, conference proceedings, state and federal government agency
16 reports, Internet databases, and technical surveys yielded cost and performance data at 36
17 full-scale and pilot-scale source depletion sites. The data indicated that enhanced
18 bioremediation has the lowest median cost per treatment volume of \$29/yd³ (n=11),
19 followed by thermal, chemical oxidation, and surfactant/cosolvent at \$88/yd³ (n=13),
20 \$125/yd³ (n=6), and \$385/yd³ (n=6), respectively. Only a slight correlation was observed
21 between treatment size and total treatment cost; however, longer treatment durations
22 correlated to lower treatment costs per volume. Treatment performance appeared to be
23 independent of unit treatment costs. The resulting cost statistics and unit costs can be
24 used to compare the cost of source depletion projects against the life-cycle cost of long-

1 term plume management techniques such as monitored natural attenuation or plume
2 containment.

3

4 **INTRODUCTION**

5 Dense non-aqueous phase liquid (DNAPL) sites pose a unique and difficult
6 challenge to environmental professionals in the remediation of groundwater. Initially,
7 sites with chlorinated solvent-contaminated groundwater were remediated using plume
8 management techniques, with pump-and-treat systems being the most common selection.
9 Most reports indicate that pump-and-treat systems have been ineffective at treating
10 contaminated groundwater even after years of groundwater pumping (NRC, 1999,
11 Pankow and Cherry, 1996). An increased understanding of the ineffectiveness of pump-
12 and-treat systems came during the 1990s (USEPA, 1989). More comprehensive site
13 characterization and evaluation led to an understanding that many of these sites contained
14 DNAPL source mass, even in cases where DNAPL is not directly encountered (USEPA,
15 1993). Capillary forces act to restrict the mobility of non-aqueous phase contaminants in
16 the subsurface, meaning that advective flushing of an aqueous phase contaminant through
17 a pump-and-treat strategy is limited by mass transfer. The presence of DNAPL, whether
18 in the residual or pooled form, can provide a continuous and long-term source of
19 contaminant for a groundwater plume with a life span of several decades to centuries,
20 depending upon the type of contaminant (Lowe et al., 1999).

21 As the understanding of DNAPL sites increased, new technologies were
22 developed and used to address the cleanup of DNAPL sites. Technologies such as air
23 sparging, enhanced bioremediation, chemical oxidation, surfactant flushing, cosolvent

1 flushing, reactive barriers, and thermal treatments have been developed and tested in
2 laboratory, pilot, and full-scale demonstrations (NRC, 1999). These technologies can
3 reduce the remediation timeframes to achieve groundwater constituent assessment levels
4 over pump-and-treat systems because they directly treat the DNAPL source material.
5 Unfortunately, there is still a great deal of uncertainty in the costs and benefits of these
6 technologies compared with non-active remediation approaches, and this uncertainty has
7 discouraged their widespread use in the treatment of sites with a DNAPL source zone
8 (Kavanaugh et al., 2003). To address this knowledge gap, a U.S. Environmental
9 Protection Agency (EPA) expert panel on DNAPL remediation identified the need for a
10 survey of DNAPL source depletion projects to provide actual information on costs and
11 benefits (Kavanaugh et al., 2003).

12 This paper presents the findings from a project funded by the Strategic
13 Environmental Research and Development Program (SERDP) to develop a source
14 remediation cost and performance database for DNAPL source depletion remediation
15 technologies. Four active remediation technologies were chosen for the cost and
16 performance database: i) enhanced bioremediation, ii) chemical oxidation, iii)
17 surfactant/cosolvent flushing, and iv) thermal treatment. Peer-reviewed literature, federal
18 and state agency reports, internet websites, and a detailed survey were used to gather
19 information on sites that used one of these four active remediation technologies to
20 address DNAPL source zone contamination. Over 60 sites were evaluated for both cost
21 and performance data, with 36 sites providing enough information on project costs. This
22 paper provides a detailed summary of cost information.

23

1 **DATA COLLECTION METHODS**

2 Sites where either i) enhanced bioremediation, ii) chemical oxidation, iii)
3 surfactant/cosolvent flushing, or iv) thermal treatment (includes steam, 3-phase, and 6-
4 phase electrical resistance heating) was performed were located, reviewed, and evaluated
5 using a collection of internet databases, state and federal agency reports, peer-reviewed
6 literature, and a detailed survey sent to environmental professionals. Exhibit 1 provides a
7 list of resources used.

8 Over 60 sites were reviewed. Collected performance data included concentration
9 reduction and/or percent of DNAPL mass removed, size (volume and area treated), and
10 cost data. The cost data incorporated whether actual project costs or estimated total costs
11 were reported for full-scale implementation of a source depletion technology. A total of
12 36 sites across the United States had sufficient performance, size, and cost data for the
13 evaluation. The following is a breakdown of these 36 field sites based on the
14 implemented source depletion technology: i) 11 enhanced bioremediation sites, ii) 13
15 chemical oxidation sites, iii) 6 surfactant/cosolvent flushing sites, and iv) 6 thermal sites.
16 Of the 36 field sites, 26 source depletion projects were classified as “full-scale”
17 applications of the technology compared to 10 “pilot-scale” projects. Exhibits 2 and 3
18 provide a summary of the sites and include treatment volume, total cost, and cost per
19 volume in both cost per cubic yard and cost per acre.

20 **EVALUATION OF COST INFORMATION**

21 A breakdown of the total treatment cost versus the treatment volume for each of
22 the remediation technologies is provided in Exhibit 4. For the four technologies, a linear
23 regression was applied to each data set, and R² values for the trend lines were used to

1 evaluate the best fit of the data. Thermal treatment demonstrated the strongest correlation
2 ($R^2 = 0.9684$) between increased total cost and increased treatment volume, followed by
3 enhanced bioremediation ($R^2 = 0.38$). Both chemical oxidation and surfactant/cosolvent
4 technologies demonstrated lesser but similar correlations ($R^2 = 0.1316$ and 0.2401 ,
5 respectively). Exhibit 3 provides a summary of total project costs. For chemical
6 oxidation and surfactant/cosolvent technologies, costs were generally between \$100,000
7 and \$2.6 million. Enhanced bioremediation demonstrated the widest range of total costs
8 (\$20,000 to \$35.4 million), followed by thermal technology total project costs (\$138,000
9 to \$20.0 million).

10 Exhibit 5 provides a comparison of the minimum, median, maximum, 25th, and
11 75th percentiles of the four active remediation technologies' cost per volume treated
12 (\$/yd³). Enhanced bioremediation had the lowest median cost per cubic yard at \$29/yd³,
13 while surfactant/cosolvent flushing had the highest median cost per cubic yard at
14 \$385/yd³. Chemical oxidation and thermal technologies had median costs per volume of
15 \$125/yd³ and \$88/yd³, respectively. Further evaluation of the 25th to 75th percentiles
16 shows that thermal treatment technologies exhibit the narrowest range in cost per volume,
17 while surfactant/cosolvent sites exhibit the widest range.

18 Lower costs for enhanced bioremediation are probably related to the cheaper unit
19 cost of enhanced bioremediation amendments (electron donor). Costs reported for
20 molasses (~\$0.50/lb), are cheaper than surfactants (~\$1.30/lb) and chemical oxidants
21 (potassium permanganate ~\$1.50 /lb to \$2.00/lb, USEPA, 1999, Ramsburg and Pennell,
22 2001). However, some enhanced bioremediation treatment sites use slow release electron
23 donors, which have a unit cost of \$5/lb to \$7/lb (AFCEE, 2004). The use of less substrate

1 (in pounds), direct push technologies for delivery, or larger well spacing are possible
2 factors that result in lower costs for sites using slow release electron donors. In the case
3 of both chemical oxidation and surfactant source depletion sites, often pore volumes (on
4 the order of thousands to tens of thousands of gallons of amendment) are injected (Lowe
5 et al., 1999).

6 **EVALUATION OF PERFORMANCE VERSUS COST**

7 Additional analysis of cost data compared the cost per volume and performance
8 data. For the sites in Exhibit 2, the literature was reviewed to determine the percent
9 reduction (or increase in the case of site C-01), using the pre-treatment and post-treatment
10 concentrations (a more detailed performance database and analysis is provided in
11 McGuire et al., submitted October 2004). Several sites reported concentration data for
12 more than one well, so a median percent reduction was used when more than one well
13 was used to determine percent reduction. Two sites did not report concentration data;
14 however, both sites, S-05 and S-06 on Exhibit 2, did report estimated cost information
15 and were used in the evaluation of cost in the above section.

16 Cost and performance were compared to determine if sites that had a higher cost
17 per volume, also had a higher percent reduction in source zone concentration. This is
18 essentially asking the question that if more money is spent per volume treated, is better
19 performance achieved? Exhibit 6 demonstrates the percent reduction of the remediation
20 technologies versus the cost per volume for each site, with a total of 34 sites represented
21 in the four graphs. The data from Exhibit 6 illustrate that the technology performance
22 appears to be independent of the cost spent per volume. In particular, there were 14 sites
23 that demonstrated performance of 99 percent or greater percent concentration reduction,

1 and the median cost per volume of those sites was \$146/yd³. In comparison, there were 7
2 sites that demonstrated performance of 70 percent or less percent concentration reduction,
3 and the median cost per volume of those sites was \$116/yd³. The minimum cost of sites
4 demonstrating 99 percent or greater percent concentration reduction was site B-02 at
5 \$2/yd³, while the maximum cost was site S-04 at \$1563/yd³. The minimum cost of sites
6 demonstrating 70 percent or less percent concentration reduction was site B-04 at
7 \$20/yd³, and the maximum cost was for site C-01 at \$194/yd³. Site C-01 also exhibited
8 the poorest performance demonstrating an *increase* of 26.6% in constituent concentration
9 with a cost of \$194/yd³. Site S-01 had the highest cost per volume at \$5,500/yd³ and
10 demonstrated a 91.2 percent reduction in constituent concentration. Conversely, site B-
11 02 had the lowest cost per volume at \$2/yd³ and demonstrated a 99.6 percent reduction in
12 constituent concentration.

13 Site treatment costs per volume are correlated more to the volume treated (i.e.,
14 economies of scale effect) than performance. Performance differences are more than
15 likely due to heterogeneities in the lithology and conditions of individual sites, thus costs
16 for implementing these technologies can vary significantly from site to site (Lowe et al.,
17 1999).

18 **EVALUATION OF TREATMENT DURATION AND COST**

19 In addition to performance data, treatment duration was evaluated to determine if
20 a correlation between longer treatment timeframes and increased cost per volume for
21 source depletion technologies existed. A total of 32 sites had treatment duration data
22 available, and the median value for the 32 sites was 210 days. Treatment duration versus
23 treatment cost per volume data is provided in Exhibit 7. From Exhibit 7, there is a slight

1 correlation ($R^2 = 0.2528$) between cost per volume and treatment duration. The site with
2 the longest treatment duration (over 2,100 days), site B-02, also had the lowest cost per
3 volume treated ($\$2/\text{yd}^3$). Six sites had treatment durations of less than one week, and
4 these sites exhibited a range of treatment costs per volume between $\$20/\text{yd}^3$ and
5 $\$5,500/\text{yd}^3$, with a median of $\$135/\text{yd}^3$. There were 12 sites with treatment durations of
6 greater than one year, and these sites exhibited a range of treatment costs per volume
7 between $\$2/\text{yd}^3$ and $\$518/\text{yd}^3$, with a median cost per volume of $\$54/\text{yd}^3$.

8 Finally, several sites have reported information comparing the cost of pump-and-
9 treat technologies versus active remediation technologies. In particular, the Visalia,
10 California thermal treatment site (site T-03) reported that using a pump-and-treat system
11 to remediate a wood-treatment site source zone would cost approximately $\$110/\text{yd}^3$
12 compared to $\$60/\text{yd}^3$ using thermal treatment (USDOE, 2000). However, the report also
13 stated that pump-and-treat would have a cheaper life cycle cost for sites with treatment
14 volumes greater than 0.5-1.0 million cubic yards. The Visalia pump-and-treat system is
15 based on the system operating for a period of 30 years, and a net-present value
16 calculation with a 3.8% discount rate. A pilot-scale treatment test using surfactant
17 technology was performed at the Bachman Road site in Oscoda, Michigan (site S-04),
18 and the site reported that full-scale implementation of surfactant treatment would cost
19 between $\$382,000$ and $\$443,000$ as compared to using pump-and-treat, which would cost
20 $\$1.2$ million (Ramsburg and Pennell, 2001). Note that both of the cost estimates for the
21 Visalia and Bachman Road sites did not include any costs for management of the plume
22 after source depletion, even though target concentration levels were not achieved at either
23 site. Based on cost data from this project, median source depletion technology costs vary

1 between \$29/yd³ and \$385/yd³, which compares favorably with the reported costs of
2 pump-and-treat of \$78/yd³ to \$200/yd³ (Lowe et al., 1999).

3 **CONCLUSIONS**

4 Remediation costs from 36 sites where one of four active source depletion
5 technologies had been applied were compiled. An analysis of these data showed:

- 6 • A slight correlation exists between increased total treatment cost and increased
7 treatment volume.
- 8 • Enhanced bioremediation had the lowest median treatment cost per volume at
9 \$29/yd³.
- 10 • Surfactant/cosolvent treatment had the highest median treatment cost per volume
11 at \$385/yd³.
- 12 • Lower unit cost for enhanced bioremediation sites may be related to cheaper cost
13 of amendments and smaller volumes of amendments applied to treatment of site.
- 14 • Technology performance is independent of cost spent per volume.
- 15 • There is a slight correlation between shorter treatment durations versus increased
16 cost per volume.
- 17 • Several sites have reported cheaper cost per volume and/or total treatment costs
18 using active remediation technologies versus pump-and-treat systems.

19 Data from this cost evaluation will be available as part of a web-based Decision Support
20 System (available from www.gsi-net.com in late 2005), which will allow users to select
21 certain site criteria and view site performance and cost data based on selected site criteria.
22 Site managers can use the unit cost data to develop planning level cost estimates for
23 different source depletion technologies. In addition, the statistical distributions of

1 remediation costs presented in the database can also used in cost studies that rely on
2 Monte Carlo simulations or other statistical tools.

3 **ACKNOWLEDGEMENTS**

4 The Strategic Environmental Research and Development Program provided
5 funding for this project. The authors would like to thank all organizations and
6 individuals that responded to the technical survey developed as part of this project.

1 **REFERENCES**

2 Air Force Center for Environmental Excellence (AFCEE). (2004). Principles and
3 practices of enhanced anaerobic bioremediation of chlorinated solvents. Air
4 Force Center for Environmental Excellence, Brooks AFB, Texas.

5 Kavanaugh, M.C., S.C. Rao, L. Abriola, J.A. Cherry, G. Destouni, R. Falta, D. Majo, J.
6 Mercer, C.J. Newell, T. Sale, S. Shoemaker, R. Siegrist, G. Teutsch, and K. Udell.
7 (2003). The DNAPL remediation challenge: is there a case for source
8 depletion? National Risk Management Research Laboratory, Ada, Oklahoma.

9 Lowe, D.F., C.L. Oubre, and C.H. Ward. (1999). Surfactants and cosolvents for NAPL
10 remediation: a technology practices manual. Lewis Publishers, Washington, DC.

11 McGuire, T.M., J.M. McDade, and C.J. Newell. (submitted, October 2004).
12 Performance and rebound of DNAPL source depletion technologies at 59 field
13 sites. Groundwater Monitoring and Remediation (not yet published).

14 NRC. (1999). Groundwater and soil cleanup. National Research Council, National
15 Academy Press. Washington, DC.

16 Pankow, J.F. and J.A. Cherry. (1996). Dense chlorinated solvents and other DNAPLs
17 in groundwater. Waterloo Press. Portland, Oregon.

18 Ramsburg, C.A. and K.A. Pennell. (2001). Experimental and economic assessment of
19 two surfactant formulations for source zone remediation at a former dry
20 cleaning facility. Groundwater Monitoring and Remediation, 21(4), 68-82.

21 USDOE. (2000). Innovative technology summary report: hydrous pyrolysis
22 oxidation/dynamic underground stripping. United States Department of Energy,
23 Office of Environmental Management, DOE/EM-0504, Washington, DC.

1 USEPA. (1989). Evaluation of ground-water extraction remedies, volume 1
2 summary report. Office of Emergency and Remedial Response, EPA/540/2-89/
3 054. Washington, DC.

4 USEPA. (1993). Evaluation of the likelihood of DNAPL presence at NPL sites,
5 national results. Office of Solid Waste and Emergency Response, EPA/540-R-
6 93-073. Washington, DC.

7 USEPA. (1999). Alternative disinfectants and oxidants guidance manual. Office of
8 Water, EPA 815-R-99-014, Washington, DC.

| | |
|-------------------------------------|---|
| Peer-Reviewed Literature | <i>Environmental Science and Technology</i> |
| | <i>Groundwater</i> |
| | <i>Groundwater Monitoring and Remediation</i> |
| | <i>Journal of Contaminant Hydrology</i> |
| | <i>Surfactants and Cosolvents for NAPL Remediation: A Technology Practices Manual</i> |
| | Battelle Conference Proceedings |
| Agencies | Federal Remediation Technologies Roundtable |
| | Florida Department of Environmental Protection |
| | Interagency DNAPL Consortium |
| | Interstate Technology and Regulatory Council |
| | Lawrence Livermore National Laboratory |
| | Texas Commission on Environmental Quality |
| | United States Environmental Protection Agency |
| United States Department of Defense | |
| Survey/Websites | SERDP survey |
| | CLU-IN website, www.clu-in.org |

Exhibit 1. Summary of Resources Used During Remediation Technology Research.
SERDP = Strategic Environmental Research and Development Program

| Site No. | Site Name | Site Location | Scale | Treatment Size (yd ³) | Total Cost (\$) | Cost per Volume (\$/yd ³) |
|---|---------------------------------|--------------------|-------|-----------------------------------|-----------------|---------------------------------------|
| <i>Enhanced Bioremediation Sites</i> | | | | | | |
| B-01 | Industrial Facility | Florida | Full | 1,556 | 235,000 | 151 |
| B-02 | Industrial Facility | New Hampshire | Full | 266,667 | 600,000 | 2 |
| B-03 | Dry Cleaning Facility | Jacksonville, FL | Full | 12,643 | 354,000 | 28 |
| B-04 | Dry Cleaning Facility | Orlando, FL | Full | 13,519 | 265,000 | 20 |
| B-05 | Industrial Facility | Concord, NH | Pilot | 667 | 60,000 | 90 |
| B-06 | Industrial Facility | Tennessee | Full | 2,222 | 500,000 | 225 |
| B-07 | Industrial Facility | San Jose, CA | Full | 4,823 | 137,900 | 29 |
| B-08 | Duluth International Airport | Duluth, MN | Pilot | 740 | 20,000 | 27 |
| B-09 | Test Area North | Idaho Falls, ID | Pilot | 233,000 | 35,410,000 | 152 |
| B-10 | Pinellas STAR Center | Largo, FL | Pilot | 2,250 | 400,000 | 178 |
| B-11 | Former Manufacturing Facility | Houston, TX | Full | 36,700 | 1,000,000 | 27 |
| <i>Chemical Oxidation Sites</i> | | | | | | |
| C-01 | Industrial Facility | Pensacola, FL | Full | 917 | 178,338 | 194 |
| C-02 | Dry Cleaning Facility | Jacksonville, FL | Full | 3,060 | 355,000 | 116 |
| C-03 | Dry Cleaning Facility | Florida | Full | 1,947 | 167,415 | 86 |
| C-04 | Dry Cleaning Facility | Jacksonville, FL | Pilot | 444 | 230,000 | 518 |
| C-05 | Dry Cleaning Facility | Dallas, TX | Full | 3,600 | 73,000 | 20 |
| C-06 | Dry Cleaning Facility | Houston, TX | Full | 25,555 | 642,400 | 25 |
| C-07 | Dry Cleaning Facility | Houston, TX | Full | 2,844 | 134,700 | 47 |
| C-08 | Westinghouse Savannah River | Aiken, SC | Full | 2,370 | 511,000 | 216 |
| C-09 | Ideal Cleaners | Hutchinson, KS | Pilot | 4,000 | 95,000 | 24 |
| C-10 | Kings Bay Naval Base | Camden Co., GA | Full | 1,778 | 223,000 | 125 |
| C-11 | Portsmouth Gas Diffusion Plant | Piketon, OH | Full | 4,000 | 562,000 | 141 |
| C-12 | Kansas City Plant | Kansas City, MO | Full | 5,600 | 1,000,000 | 179 |
| C-13 | Launch Complex 34 | Cape Canaveral, FL | Pilot | 6,250 | 1,270,000 | 203 |
| <i>Surfactant/Cosolvent Sites</i> | | | | | | |
| S-01 | Dry Cleaning Facility | Jacksonville, FL | Pilot | 80 | 440,000 | 5500 |
| S-02 | Hill Air Force Base | Hill AFB, UT | Full | 7,034 | 1,200,000 | 171 |
| S-03 | Camp Lejeune Site 88 | Jacksonville, NC | Pilot | 4,444 | 2,662,000 | 599 |
| S-04 | Bachman Road Site | Oscoda, MI | Pilot | 142 | 222,000 | 1563 |
| S-05 | Union Pacific Site ¹ | Laramie, WY | Pilot | 5,000 | 500,000 | 100 |
| S-06 | Alameda NAS | Alameda, CA | Pilot | NA | NA | 66 |
| <i>Thermal Sites</i> | | | | | | |
| T-01 | Industrial Facility | Illinois | Full | 26,667 | 853,344 | 32 |
| T-02 | Industrial Facility | Florida | Full | 12,963 | 3,883,000 | 300 |
| T-03 | Visalia | Visalia, CA | Full | 332,222 | 20,000,000 | 60 |
| T-04 | Manufacturing Plant | NA | Full | 1,040 | 138,000 | 133 |
| T-05 | Cape Canaveral | Cape Canaveral, FL | Full | 6,250 | 726,000 | 116 |
| T-06 | Area M DOE Site | Savannah River, GA | Pilot | 29,088 | 1,277,300 | 44 |

Exhibit 2. Summary of Remediation Technology Sites. NA = Data not available;

¹ = Total project cost and volume reported as an estimate in site literature.

| Technology | Total Project Costs | | |
|-------------------------|----------------------------|------------------|---------------------|
| | Minimum | Median | Maximum |
| Enhanced Bioremediation | \$20,000 | \$354,000 | \$35,410,000 |
| Chemical Oxidation | \$73,000 | \$230,000 | \$1,270,000 |
| Surfactant/Cosolvent | \$222,000 | \$500,000 | \$2,662,000 |
| Thermal | \$138,000 | \$1,065,322 | \$20,000,000 |
| Total | \$20,000 | \$440,000 | \$35,410,000 |

Exhibit 3. Summary of Total Project Costs for Enhanced Bioremediation, Chemical Oxidation, Surfactant/Cosolvent, and Thermal Technologies. Note that site S-06 did not report total project costs and is not included in this summary.

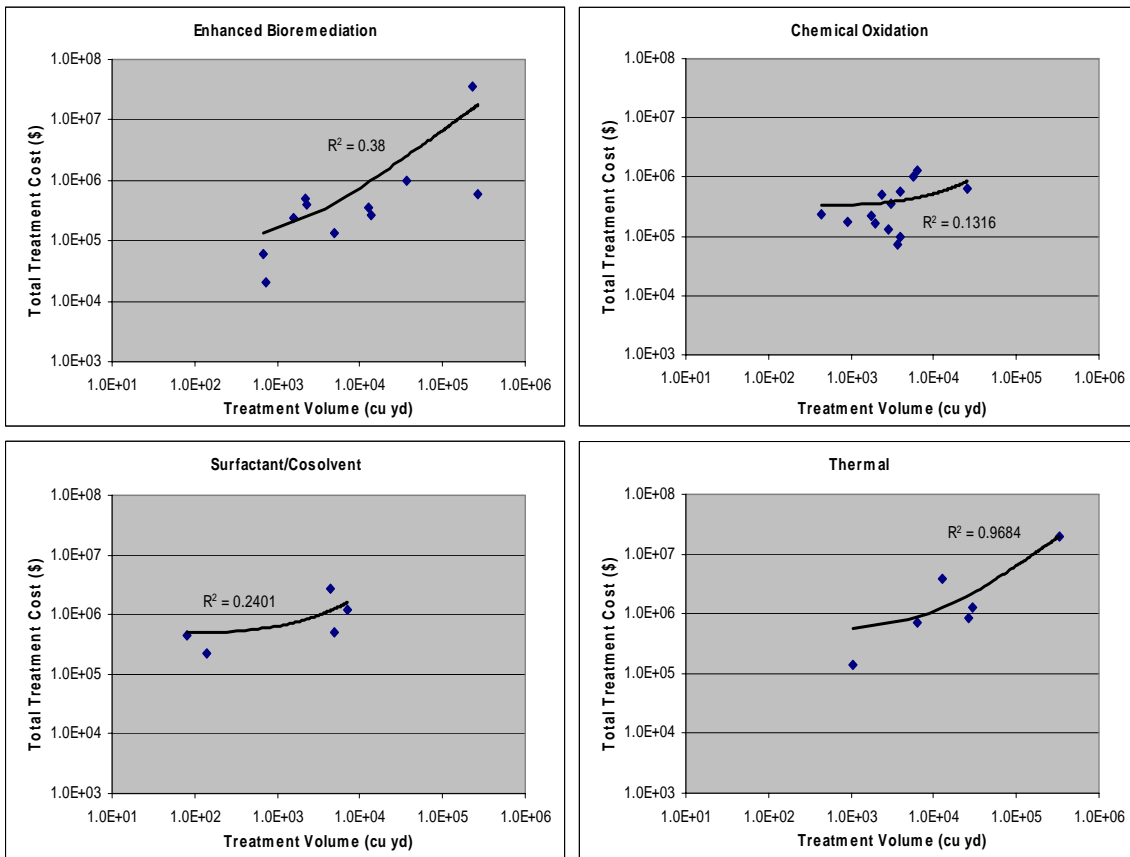


Exhibit 4. Total Treatment Cost for Enhanced Bioremediation, Chemical Oxidation, Surfactant/Cosolvent, and Thermal Technologies versus Treatment Volume.

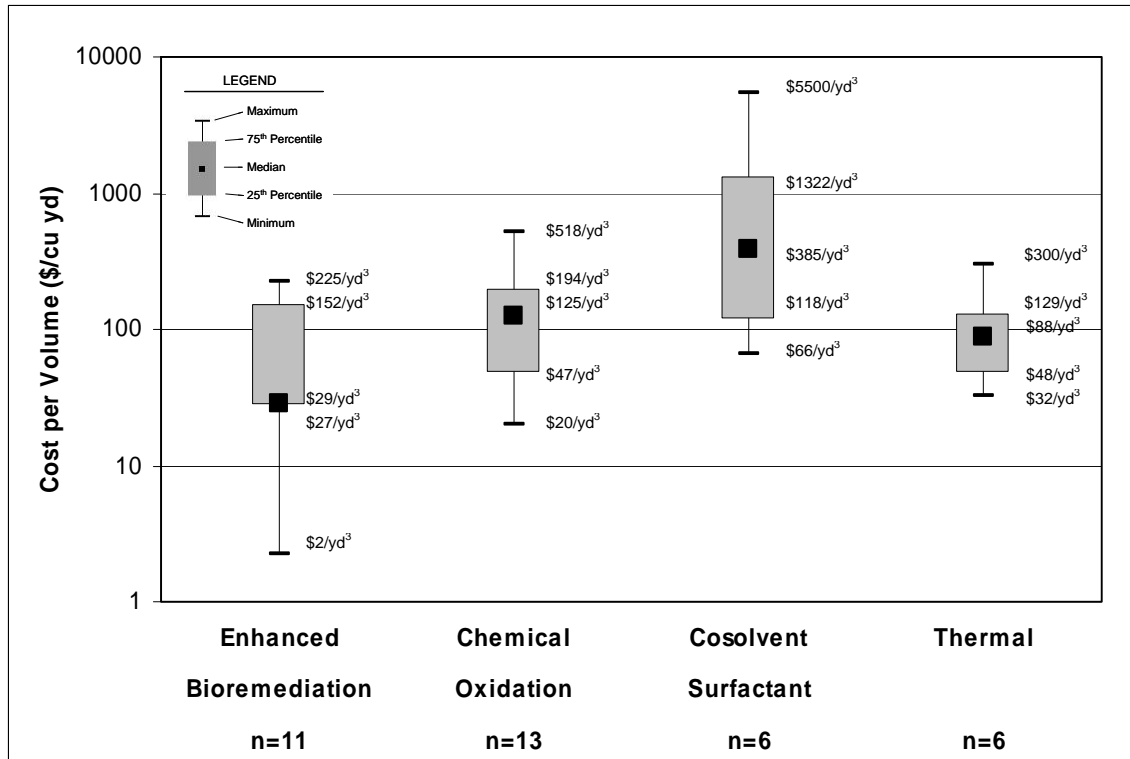


Exhibit 5. Whisker Plots of Minimum, Median, Maximum, 25th, and 75th Percentiles of Cost per Volume Data. n = number of sites with reported data

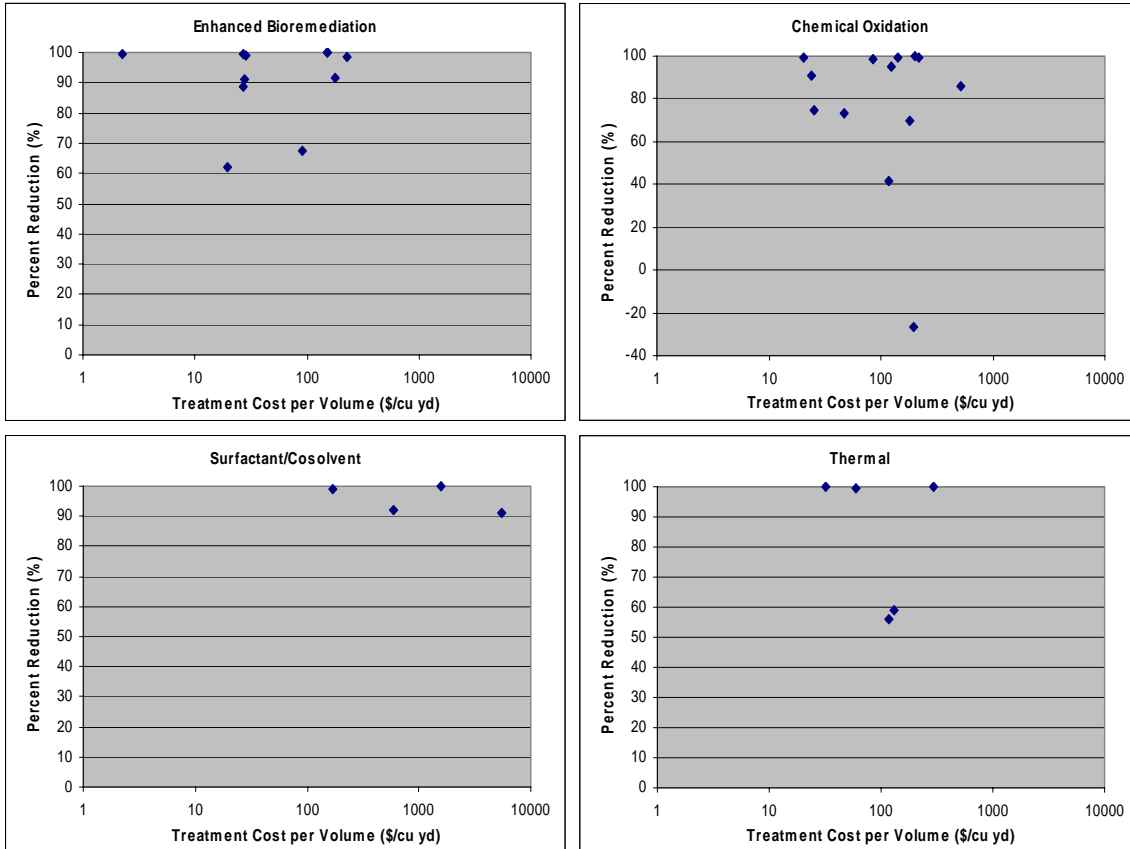


Exhibit 6. Performance as Percent Concentration Reduction versus Treatment Cost per Volume for the Four Remediation Technologies. Note that performance data was not reported for sites S-05 and S-06 on Exhibit 2.

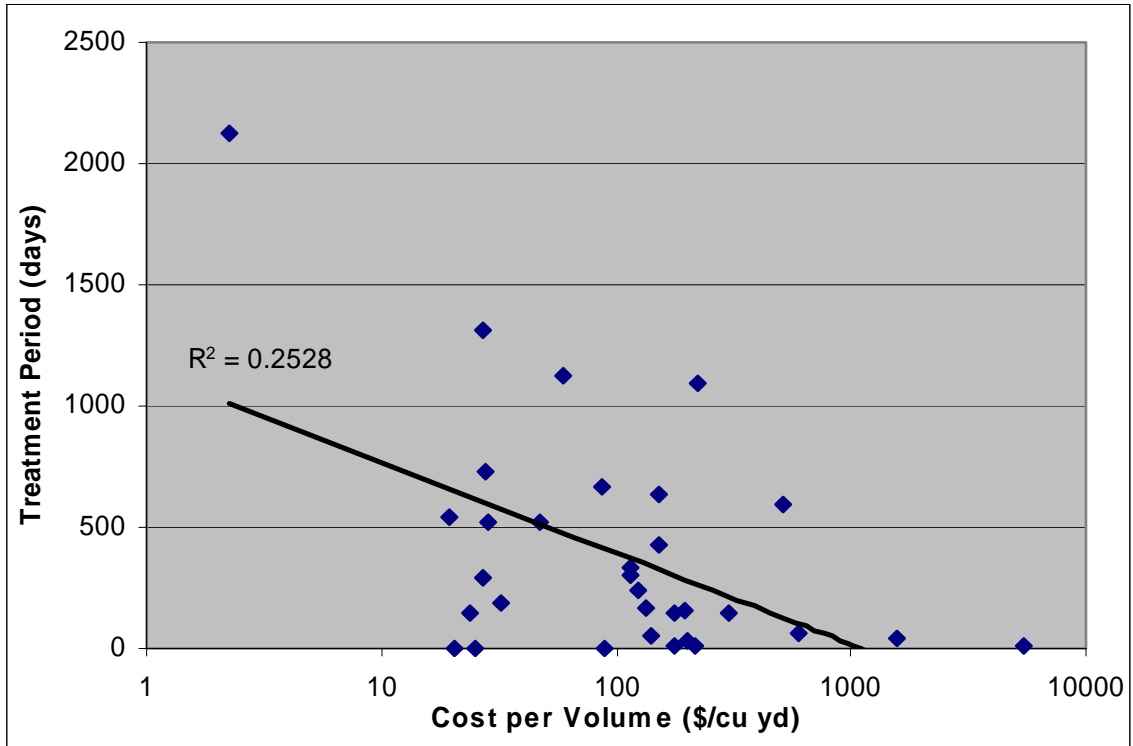


Exhibit 7. Treatment Duration versus Treatment Cost per Volume. Note that treatment duration was not reported for sites S-02, S-05, S-06, and T-06 on Exhibit 2.

James M. McDade,¹ is an environmental scientist with Groundwater Services, Inc. He received a B.S. degree in Bioenvironmental Science from Texas A&M University and a M.S. in Environmental Engineering from Rice University. His project experience includes RCRA corrective measure implementation, site characterization, bioremediation of fuels and chlorinated solvents, natural attenuation, and long-term monitoring.

Travis M. McGuire,¹ is an environmental scientist with Groundwater Services, Inc. He received B.S. degrees in Chemistry and Environmental Science from McNeese State University and a M.S. in Environmental Engineering from Rice University. His project experience includes site characterization, bioremediation of chlorinated solvents, natural attenuation, and DNAPL source zone characterization and remediation.

Charles J. Newell,¹ Ph.D., is a Vice President of Groundwater Services, Inc. He has co-authored three EPA publications, five environmental decision support software systems, numerous technical articles, and two books: *Natural Attenuation of Fuels and Chlorinated Solvents* and *Ground Water Contamination: Transport and Remediation*. His professional expertise includes site characterization, groundwater modeling, non-aqueous phase liquids, risk assessment, natural attenuation, bioremediation, non-point source studies, software development, and long-term monitoring projects.

¹ Groundwater Services, Inc., 2211 Norfolk, Suite 1000, Houston, Texas 77098