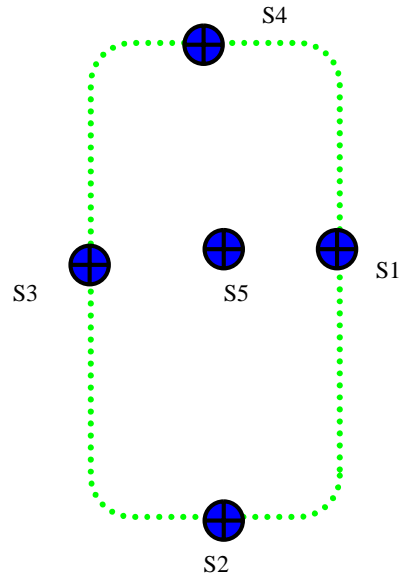


NOT TO SCALE

SCENARIO 1
Excavation is 10' x 12' to 8' deep
S5 EPH = 5,300 ppm
S5 Contingents Pass
S1 through S4 EPH are all less than 1,000
EPH Average = 1,700 ppm



QUESTIONS

- 1). Can we request unrestricted use NFA using compliance averaging for EPH?
- 2). Do we have to delineate EPH at S5?

NOT TO SCALE

SCENARIO 2

Excavation extends to dwelling and is 12' x 15' to 10' deep

S1 EPH = 5,800 ppm

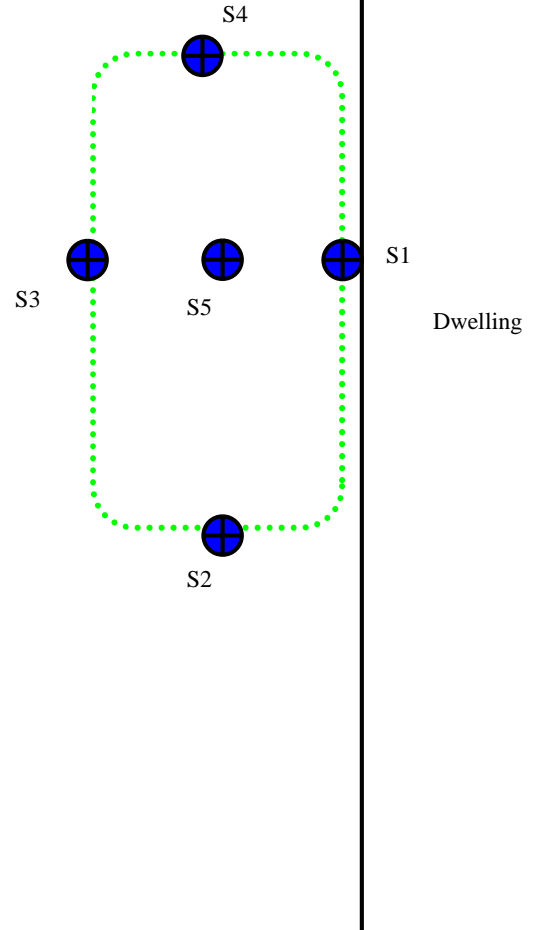
S1 Naphthalene = 9 ppm

S2 through S5 EPH is less than 100 ppm

S2 through S5 Naphthalene was ND

EPH Average = 1,200 ppm

Naphthalene Average = 1.8 ppm



QUESTIONS

- 1). Can we request unrestricted use NFA using compliance averaging for EPH and Naphthalene?
- 2). Do we have to delineate EPH and/or naphthalene at S1?

NOT TO SCALE

SCENARIO 3

Excavation extends to dwelling and is 12' x 15' to 10' deep

S1 EPH = 7,600 ppm

S1 Naphthalene = 10 ppm

S2 through S5 EPH Ranges Between 3,700 and 4,500 ppm

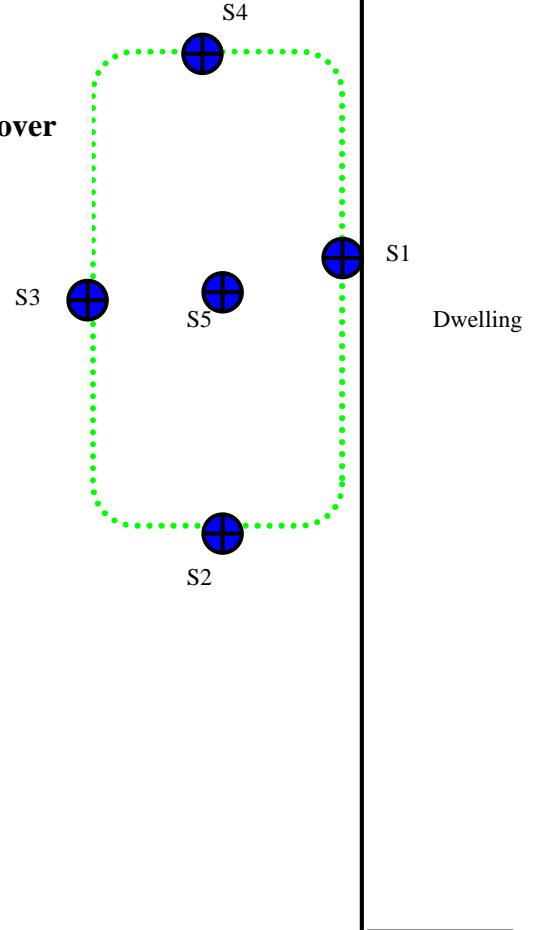
S2 through S5 Naphthalene is 2 ppm or less

EPH Average = 5,200 ppm

Naphthalene Average = 3 ppm

Physical constraints prevent removing additional soil

Delineation of EPH around S1 shows volume of soil with EPH over 5,100 ppm is 12 cubic yards.



QUESTIONS

- 1). Can we request unrestricted use NFA with de minimis quantity exception?
- 2). Do we have to delineate naphthalene at S1?

NOT TO SCALE

SCENARIO 4

Excavation extends to within 2 feet of dwelling

Excavation is 12' x 15' to 12' deep

Soil is sandy

S1 EPH = 6,300 ppm

S1 Contingents pass

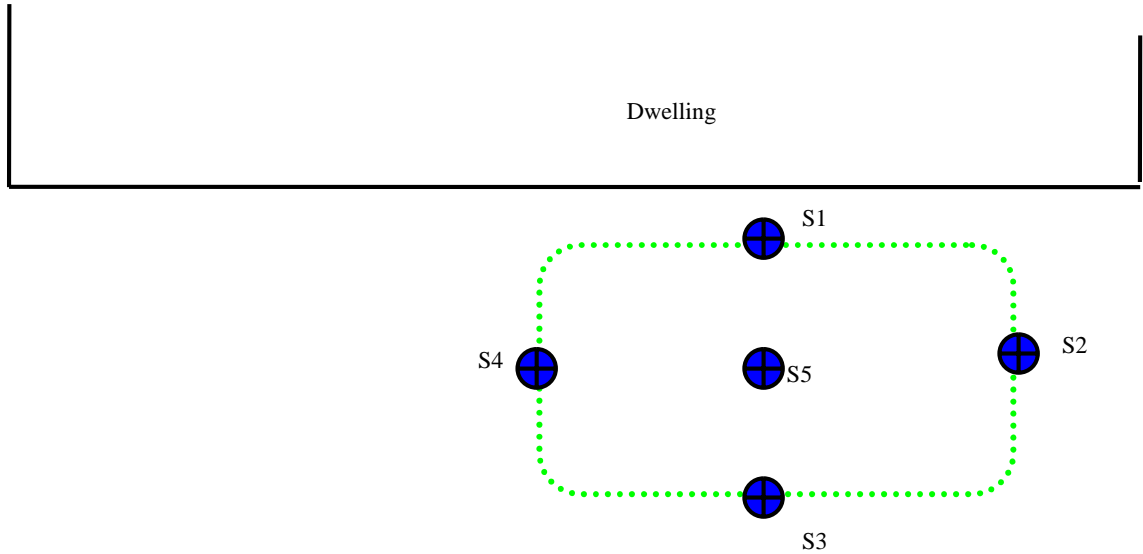
S2 through S5 EPH all less than 5,100 ppm

EPH Average = 5,400 ppm

Can't dig closer to house without supporting house

Physical constraints prevent removing additional soil in other directions

Delineation of EPH around S1 shows volume of soil with EPH over 5,100 ppm is 12 cubic yards.



QUESTIONS

- 1). Can we request variance to request unrestricted use NFA with de minimis quantity exception?

NOT TO SCALE

SCENARIO 5

Excavation extends to within 2 feet of dwelling

Excavation is 12' x 15' to 12' deep

Soil is sandy

S1 EPH = 6,300 ppm

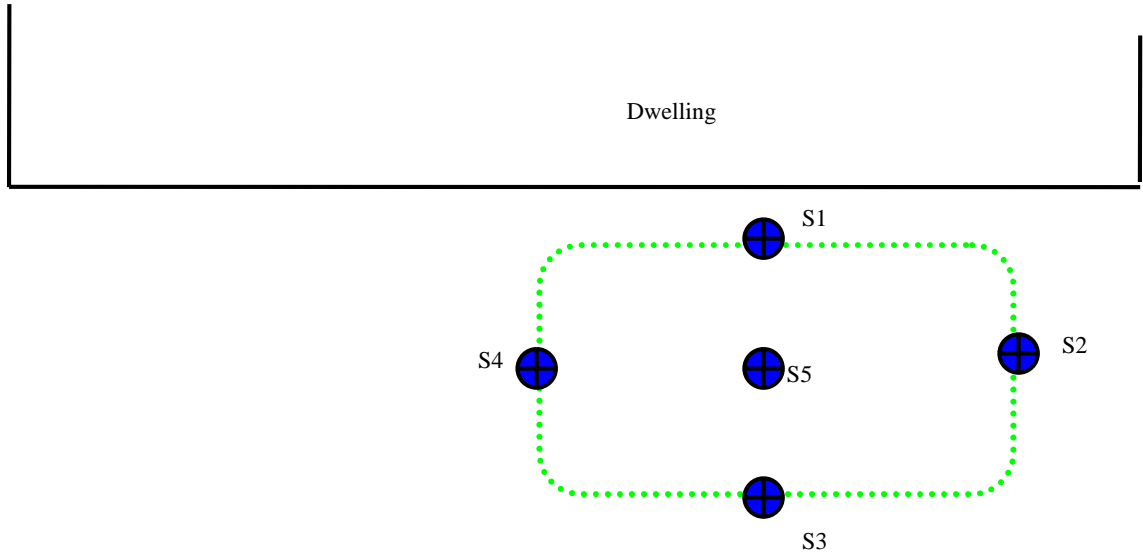
S1 Contingents pass

S2 through S5 EPH all less than 5,100 ppm

EPH Average = 5,400 ppm

Can't dig closer to house without supporting house

Excavation in other directions is possible



QUESTIONS

- 1). Can we dig out more soil in other directions until those locations have EPH concentrations low enough to bring average below 5,100 ppm and then request an unrestricted use NFA using compliance averaging?

NOT TO SCALE

SCENARIO 6

Excavation extends to within 2 feet of dwelling

Excavation is 12' x 15' to 12' deep

Soil is sandy

S1 EPH = 6,300 ppm

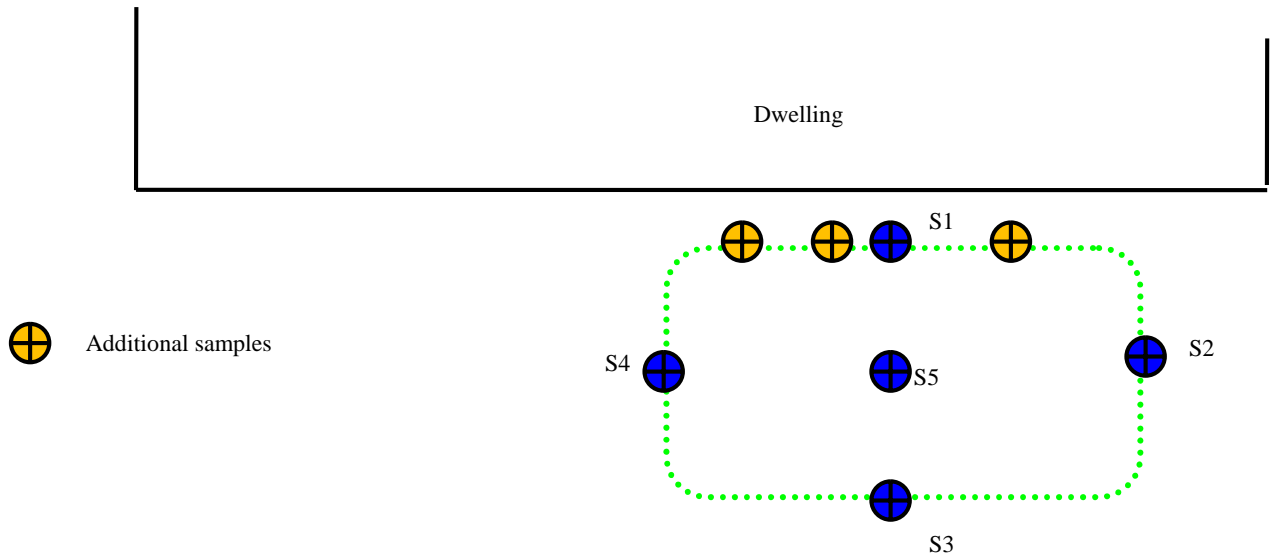
S1 Contingents pass

S2 through S5 EPH all less than 5,100 ppm

EPH Average = 5,400 ppm

Can't dig closer to house without supporting house

Excavation in other directions is not possible



QUESTIONS

- 1). If we collect the three additional samples shown and those EPH concentrations are low enough to bring EPH average below 5,100 ppm can we then request an unrestricted use NFA using compliance averaging?

NOT TO SCALE

SCENARIO 7 – USING 75/10 COMPLIANCE AVERAGING PROCEDURE

Excavation extends to within 2 feet of dwelling

Excavation is 12' x 15' to 12' deep

Soil is sandy

S1 EPH = 6,300 ppm

S8 EPH = 5,200 ppm

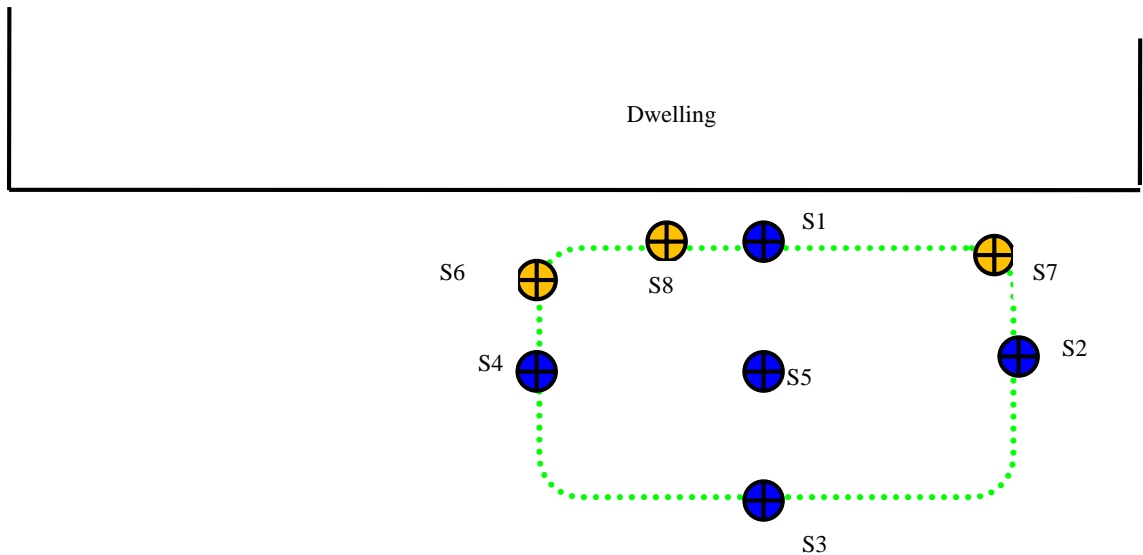
S1 Contingents pass

S2 through S7 EPH all less than 5,100 ppm

EPH Average = 4,900 ppm

Can't dig closer to house without supporting house

Excavation in other directions is not possible



QUESTIONS

1). Can we request an unrestricted use NFA using 75/10 compliance averaging since 75% of the samples are below 5,100 ppm EPH and no sample is more than 10X the standard?

2). If we collect 8 samples for naphthalene and two are above 8 ppm and average is above 8 ppm but no sample is higher than 20 ppm can we request an unrestricted use NFA using the 75/10 compliance averaging since 75% of the samples are below the standard and none exceeded the standard by more than 10X?