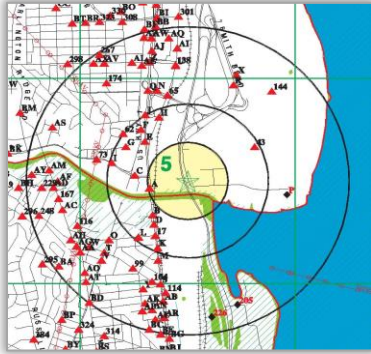


## Potentially Responsible Parties Evaluation – Commingled VOC Plume



EKI was retained by attorneys representing a Fortune 500 company with a former manufacturing facility in California. The region in which the former facility is located was historically mined for clay, which resulted in large pits remaining in the area after the clay was removed. The pits were subsequently used as unregulated landfills. Aerospace, chemical, and electrical manufacturing facilities later occupied many of the filled parcels.

Chemicals of concern (COCs), primarily chlorinated volatile organic compounds (VOCs), have been identified in soil, soil vapor, and groundwater at the site. COCs have also been identified in soil, soil vapor, and groundwater at neighboring properties and in drinking water supply wells. The California Regional Water Quality Control Board issued a Cleanup and Abatement Order, which would require EKI's client to investigate neighboring properties and to provide replacement drinking water to the community.

EKI's role was to provide technical expertise and to assist the attorneys in identifying potentially responsible parties (PRPs) to the commingled VOC plume. To do so, EKI performed the following:

- Compiled and critically reviewed existing environmental and historical data and information regarding potential sources, including the former research and development and manufacturing facilities.
- Investigated the former landfills to identify the potential for chemicals in disposed materials to have contributed to the plume.
- In furtherance of the PRP search, EKI completed file reviews at environmental and regulatory agencies and developed a database to track and allow timely distribution of critical documents related to the numerous PRP sites.
- Performed research on prior chemical uses, regulatory records, and environmental investigation and remediation activities at the PRP sites.
- Prepared a comprehensive source identification report and collaborated with technical team members to develop the regional site conceptual model.
- Compiled and reviewed historical chemical use records for the client's facility to support existing litigation relating to investigation and cleanup of on-site releases.