

# In-situ Amendment and Delivery Methods: Design and Construction Considerations



**Moderated Panel**

# Today's Panel



**Mark Strong**  
**Jacobs Engineering**

Panelist



**Glenn Iosue, PE**  
**REGENESIS**

Panelist



**Chapman Ross, PE**  
**FRx, Inc**

Panelist



**Jason Ruf**  
**S2C2, Inc.**

Panelist



**Rick Cramer, PG**  
**Burns & McDonnell**

Panelist

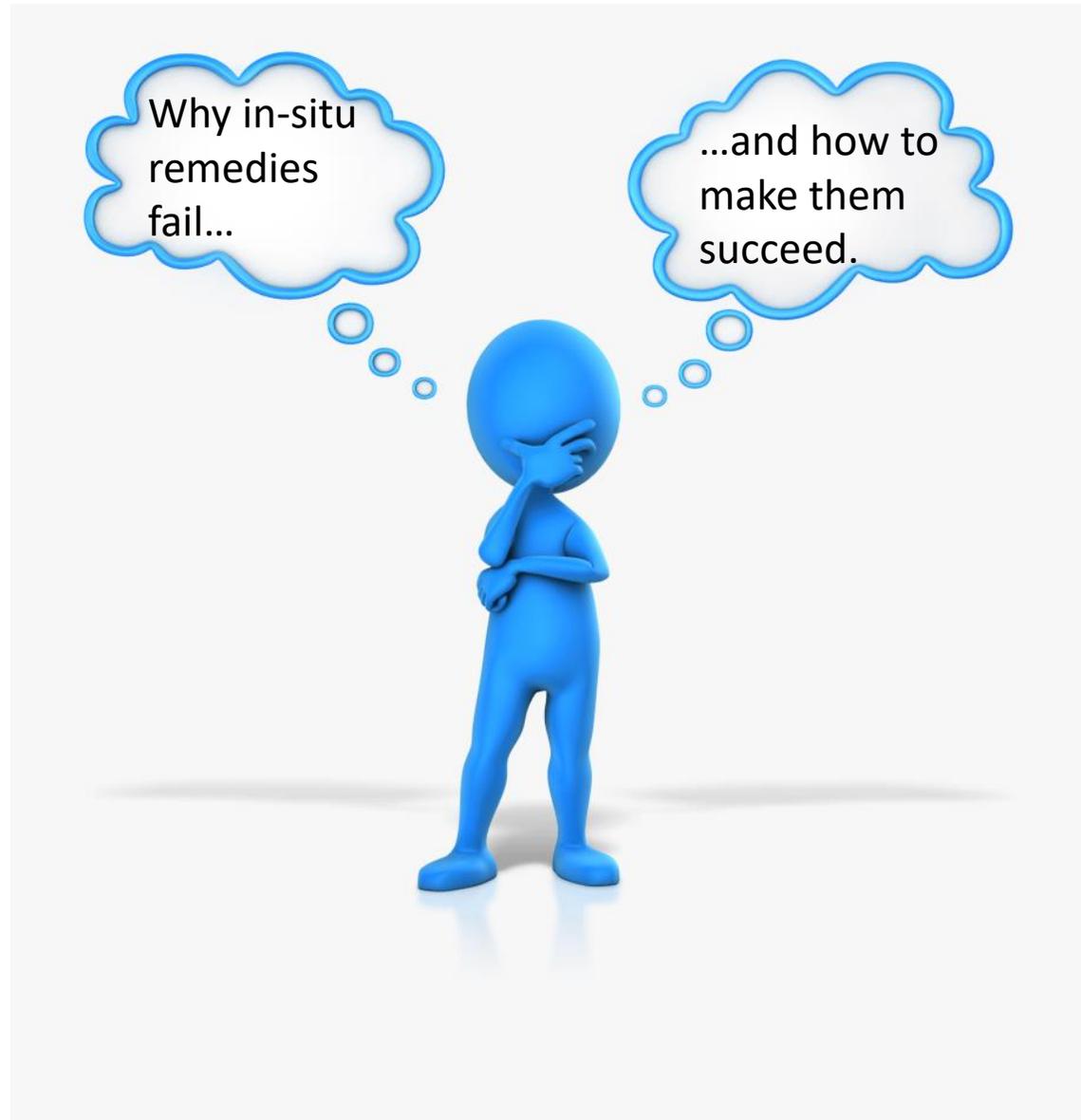


**Rich Evans, PE**  
**Groundwater &  
Environmental Services, Inc.**

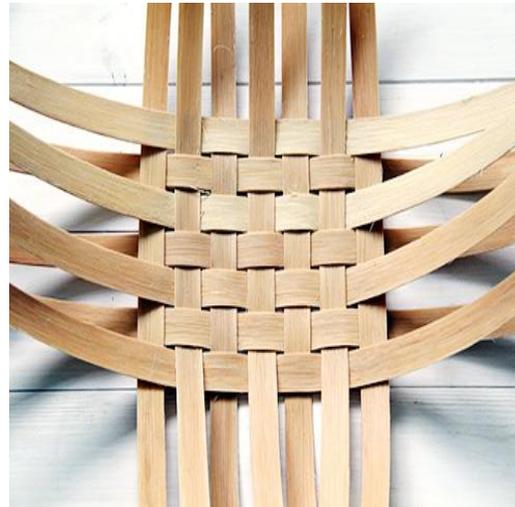
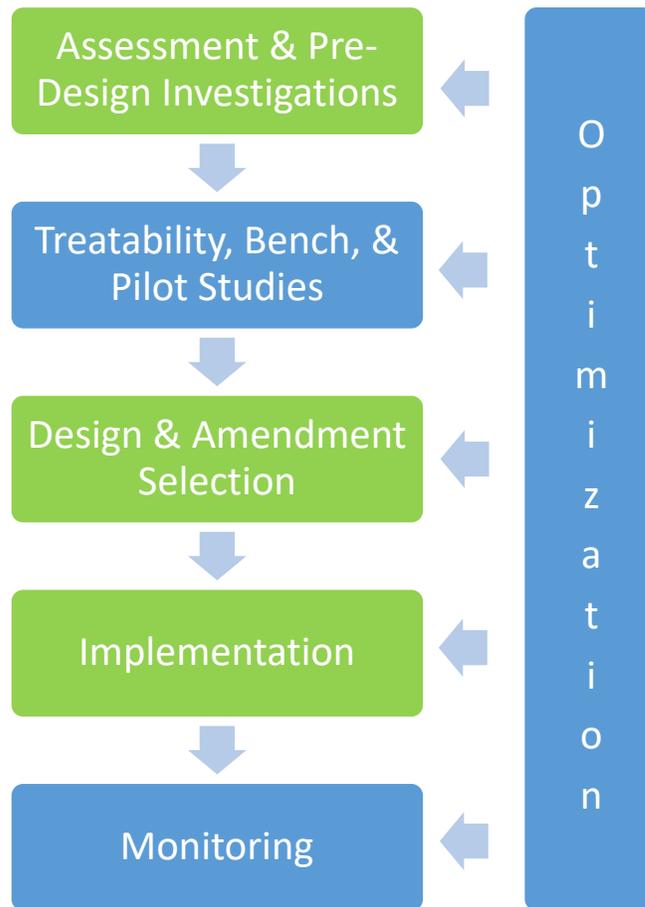
Moderator

# Audience Demographics Poll Questions

1. Have you achieved a no further action/site closure using an in-situ injection technology?
  - a. Yes, as the primary remedy
  - b. Yes, as a secondary or polish remedy
  
2. How do you measure success of an in-situ remediation project?
  - a. No further action attainment/site closure
  - b. Mass reduction
  - c. Removing pathways to sensitive receptors
  - d. Improving site conditions for beneficial re-use
  - e. Other



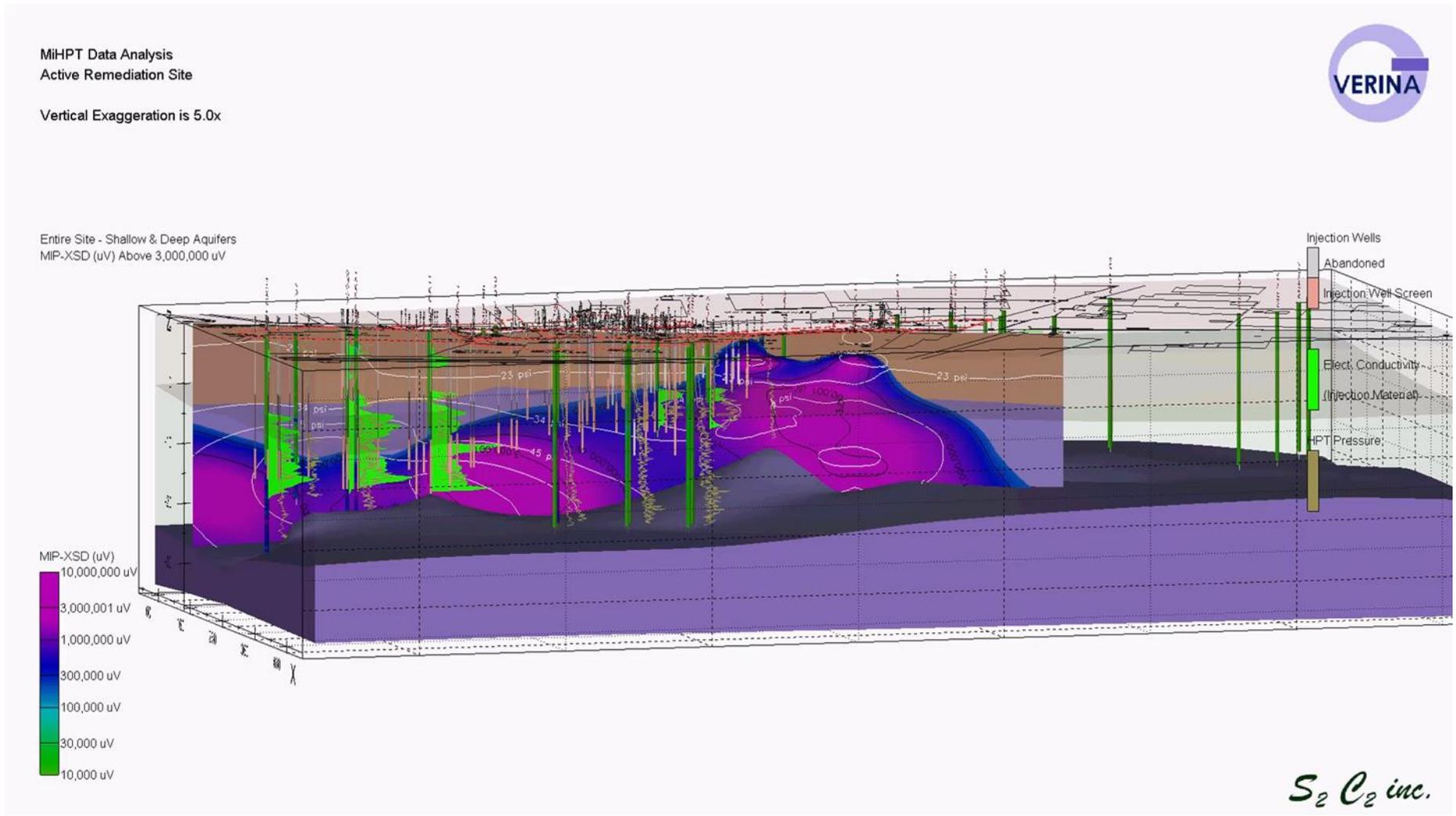
# In-situ Project Stages and Panel Discussion



- Best management practices
- Common pitfalls
- Setting expectations
- Costs
- Sustainability

# Assessment & Pre-Design Investigations

# Case Study – 3D Visualization and HRSC a tool for Optimization of In-Situ Remediation

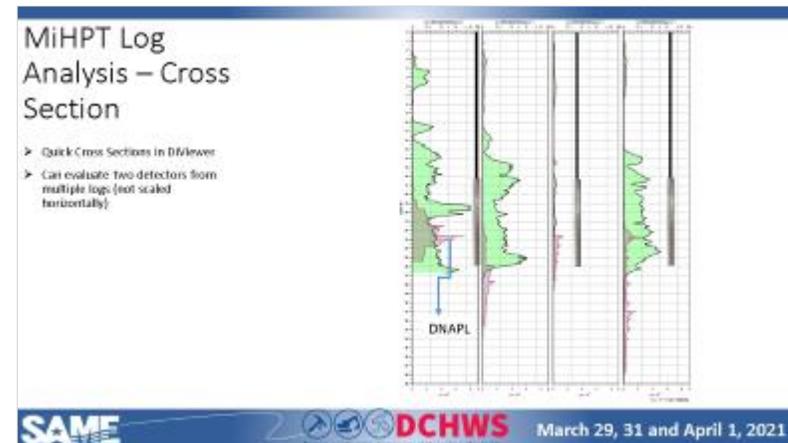
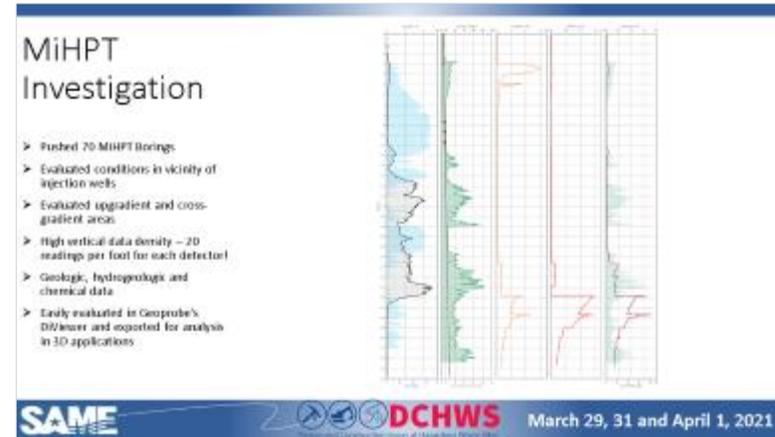


# Poll Questions

3. Have you completed a direct-sensing (High Resolution Site Characterization) prior to implementing an injection program?
  - a. No
  - b. Yes - if so, which tools were used
    - i. MIP
    - ii. MiHPT
    - iii. HPT
    - iv. Waterloo Profiler
    - v. CPT
    - vi. LIF/UVOST/OIP
    - vii. TarGOST
    - viii. Geophysics
    - ix. Other
4. Have you completed a direct-sensing program as part of a post remedy evaluation?
  - a. Yes
  - b. No

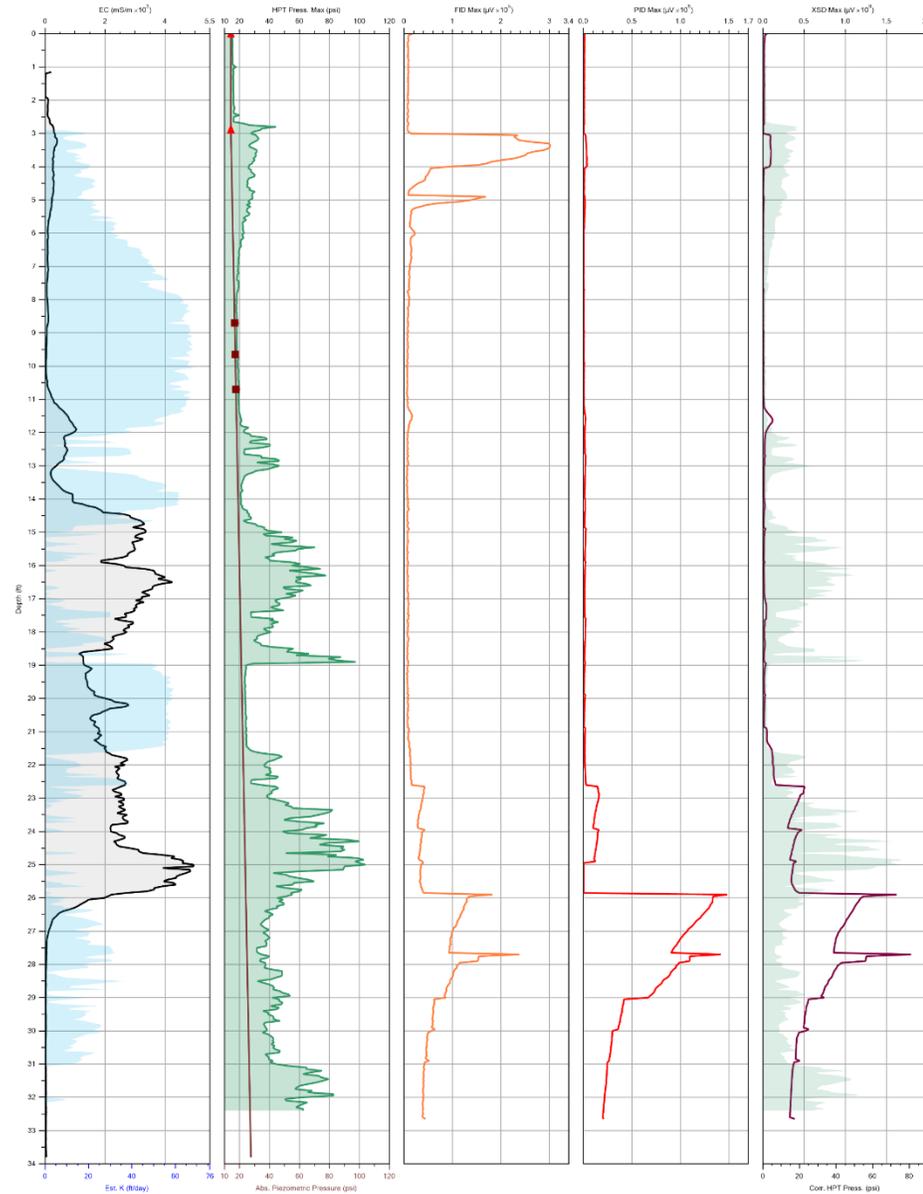
# The Problem: How do we optimize Site Remediation and achieve Site Closure?

- Client wanted to evaluate current conditions – post remediation
- Recommended HRSC using MiHPT and development of 3D CSM :
  - Use MiHPT to identify untreated mass
  - Use MiHPT to evaluate mass vs geology
  - Use MiHPT to evaluate past injection effectiveness
  - Develop 3D CSM to evaluate chemical trends/mass and to visualize monitoring well data vs HRSC data
- Closure Strategy – Focused source treatment, institutional controls and MNA



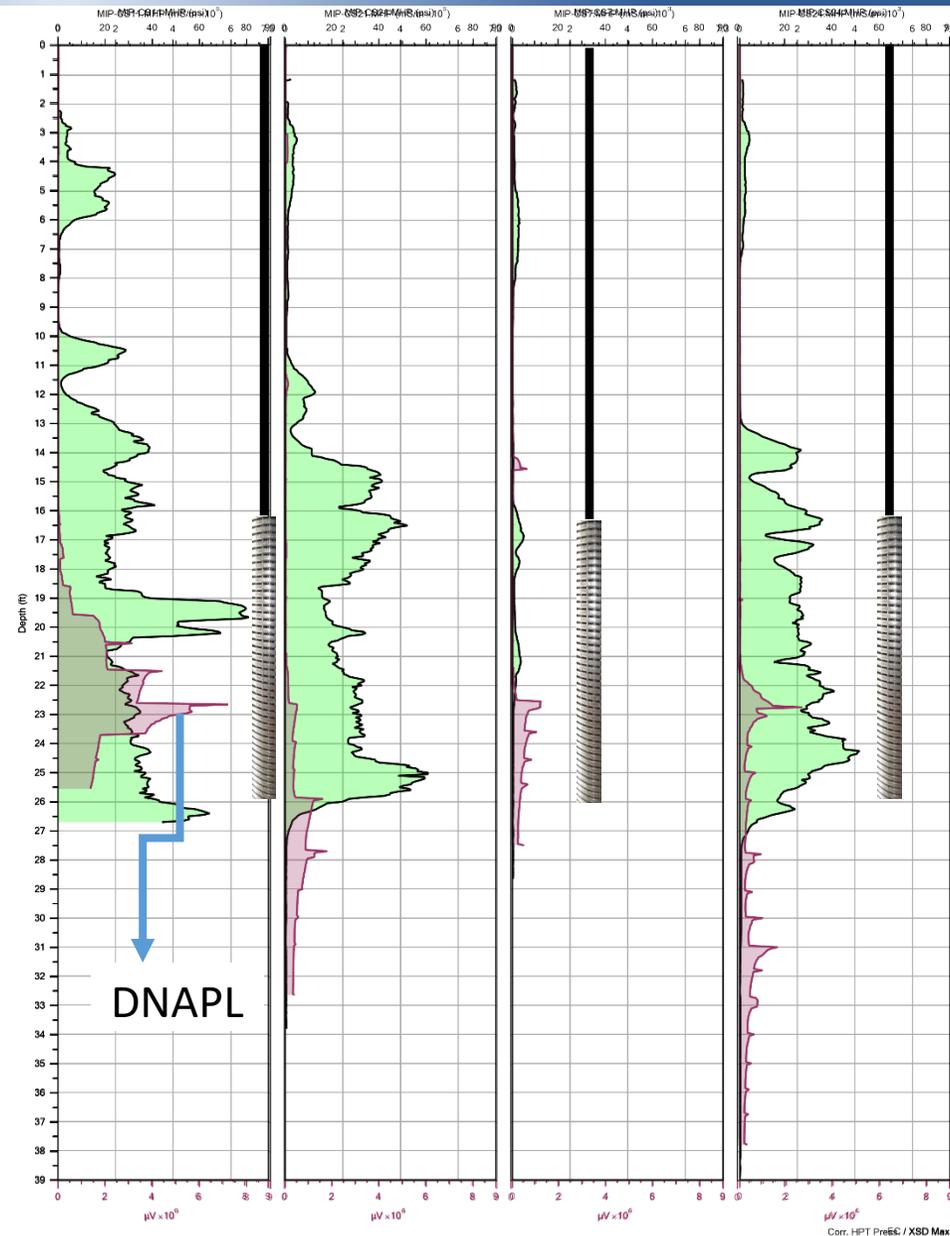
# MiHPT Investigation

- Pushed 70 MiHPT Borings
- Evaluated conditions in vicinity of injection wells
- Evaluated upgradient and cross-gradient areas
- High vertical data density – 20 readings per foot for each detector!
- Geologic, hydrogeologic and chemical data
- Easily evaluated in Geoprobe's DiViewer and exported for analysis in 3D applications



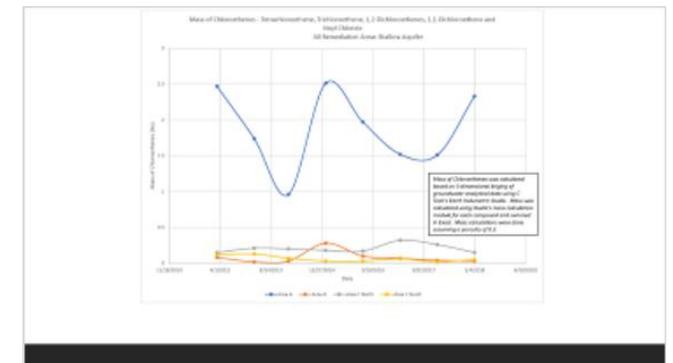
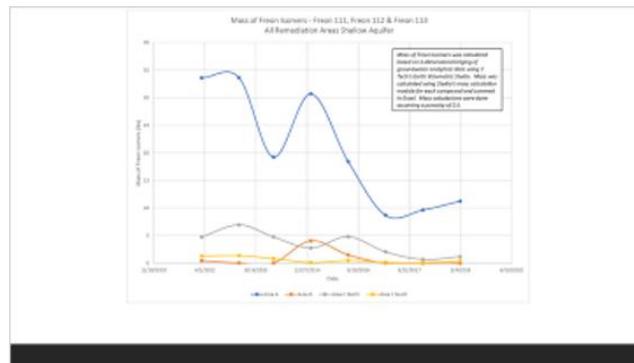
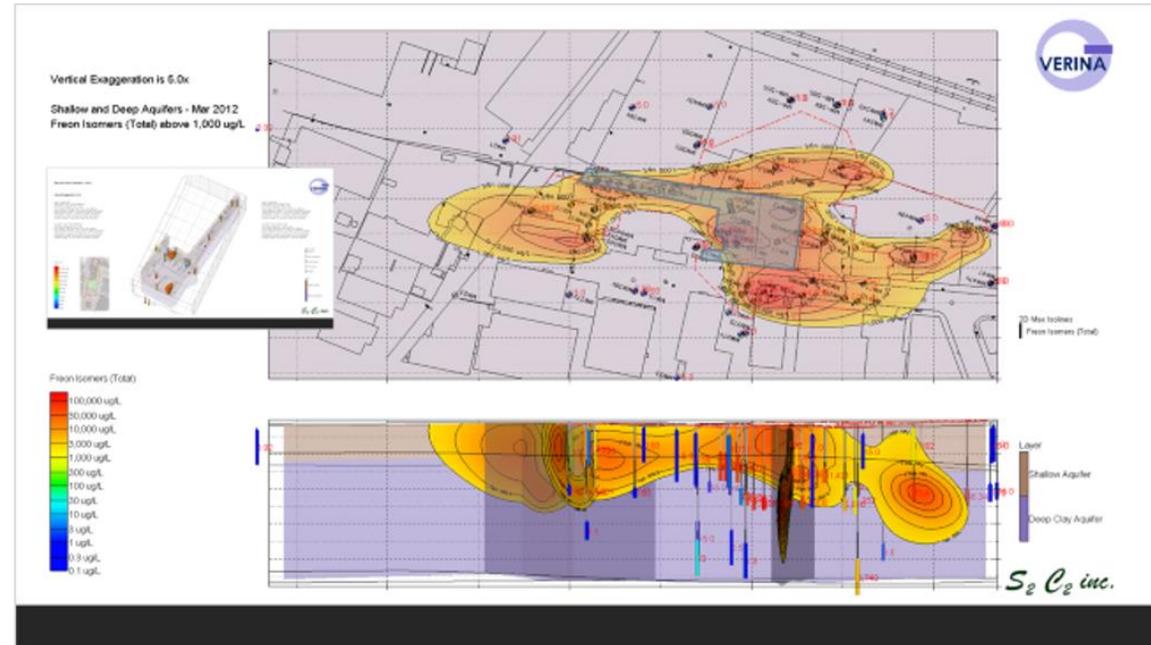
# MiHPT Log Analysis – Cross Section

- Quick Cross Sections in DiViewer
- Can evaluate two detectors from multiple logs (not scaled horizontally)



# 3-Dimensional Conceptual Site Models & Data Analysis

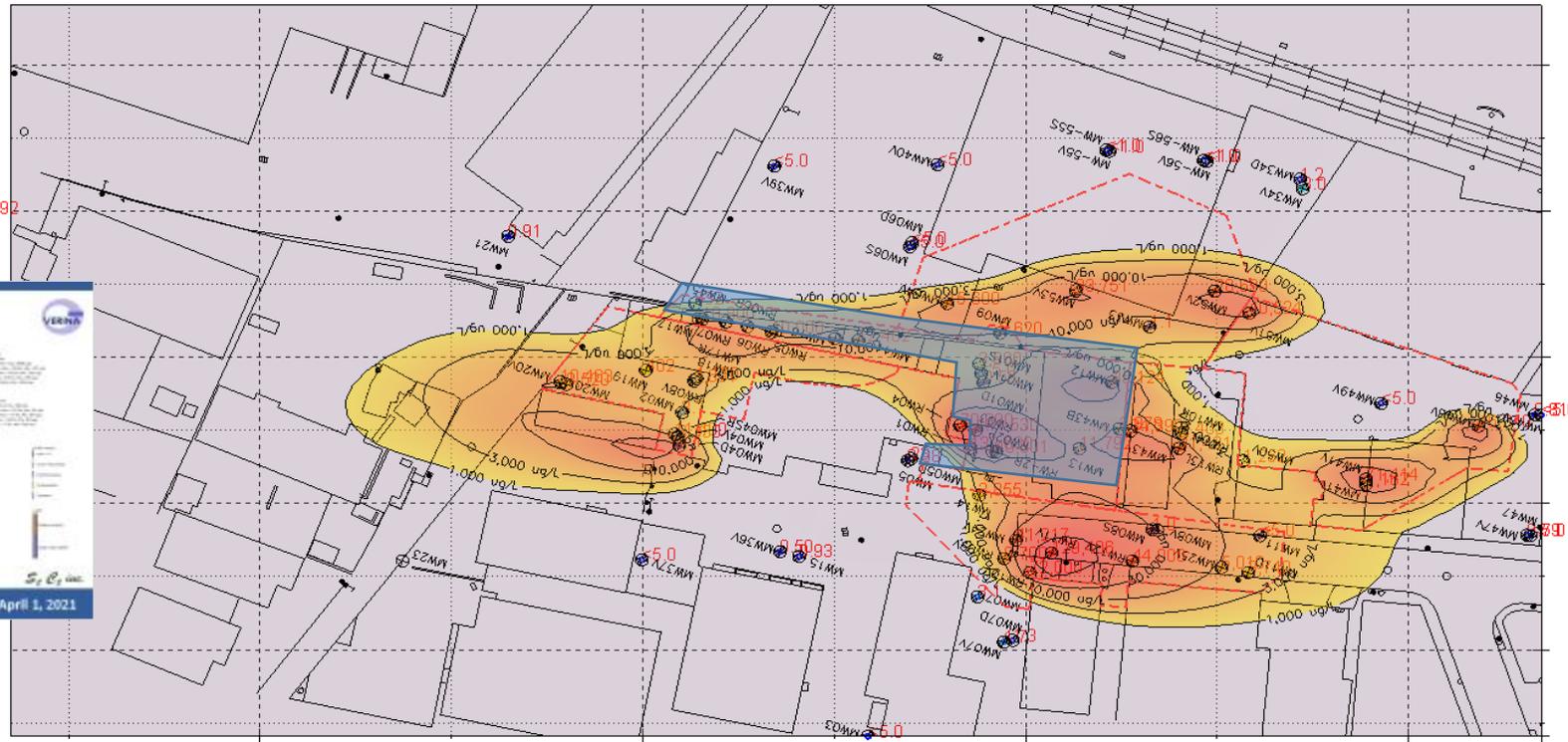
- Analyze spatial relationships as well as temporal relationships of analytical groundwater monitoring data
- For this site we calculated mass for 5 injection areas, 16 analytes (4 groups of analytes), two geologic units, & 8 sampling events (2012-2019).
- **That's 1,280 calculations!**  
**(We can do this today in minutes using python)**





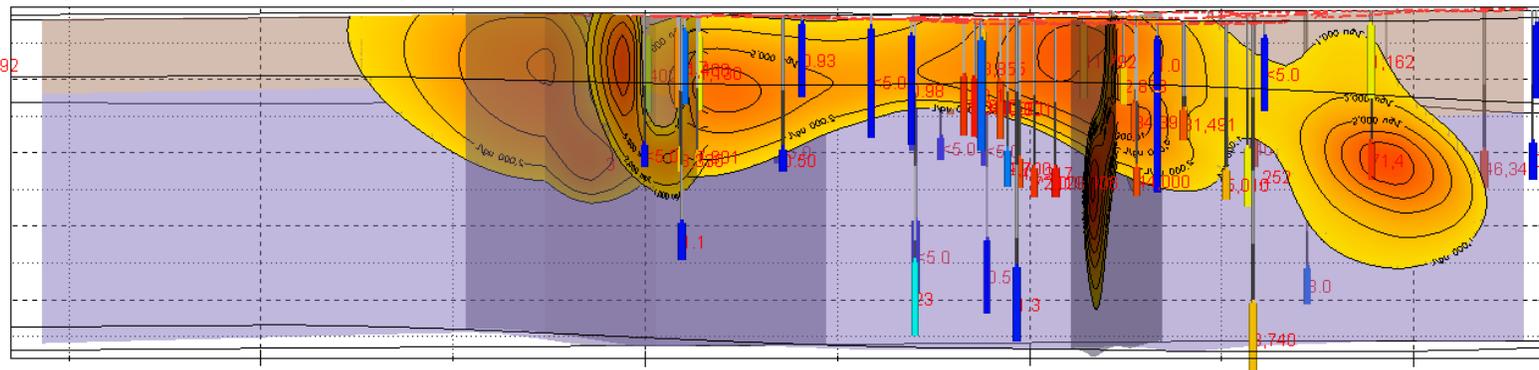
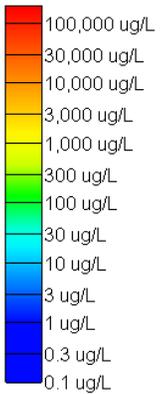
Vertical Exaggeration is 5.0x

Shallow and Deep Aquifers - Mar 2012  
Freon Isomers (Total) above 1,000 ug/L



2D Max Isolines  
Freon Isomers (Total)

Freon Isomers (Total)



Layer  
Shallow Aquifer  
Deep Clay Aquifer

*S<sub>2</sub>C<sub>2</sub> inc.*



**DCHWS**

Design and Construction Issues at Hazardous Waste Sites

March 29, 31 and April 1, 2021

Mass and Volume Calculations - Area A

Vertical Exaggeration is 2.5x

Area A - February 2019

Shallow Aquifer - Freon 113 Above 20,000 ug/l

Total Volume (Including Soil): 91 cu. yards

Freon - Average: 25145.6 ug/L; Mass: 0.97 lbs; Max: 39600 ug/L

Carbon Tetrachloride - Average: 0.0 ug/L; Mass: 0.00 lbs; Max: 1970 ug/L

Tetrachloroethene - Average: 0.0 ug/L; Mass: 0.00 lbs; Max: 2590 ug/L

Trichloroethene - Average: 0.0 ug/L; Mass: 0.00 lbs; Max: 1690 ug/L

Chloroform - Average: 0.0 ug/L; Mass: 0.00 lbs; Max: 15200 ug/L

Clay Aquifer - Freon 113 Above 20,000 ug/l

Total Volume (Including Soil): 20 cu. yards

Freon - Average: 24861.4 ug/L; Mass: 0.21 lbs; Max: 7860 ug/L

Carbon Tetrachloride - Average: 123.3 ug/L; Mass: 0.00 lbs; Max: 403 ug/L

Tetrachloroethene - Average: 1387.3 ug/L; Mass: 0.01 lbs; Max: 969 ug/L

Trichloroethene - Average: 395.2 ug/L; Mass: 0.00 lbs; Max: 999 ug/L

Chloroform - Average: 4121.4 ug/L; Mass: 0.03 lbs; Max: 2540 ug/L

Area A - February 2019

Shallow Aquifer - Freon 113 Above 1.0 ug/l

Total Volume (Including Soil): 5594 cu. yards

Freon - Average: 3710.0 ug/L; Mass: 8.75 lbs; Max: 39600 ug/L

Carbon Tetrachloride - Average: 0.1 ug/L; Mass: 0.00 lbs; Max: 1970 ug/L

Tetrachloroethene - Average: 0.1 ug/L; Mass: 0.00 lbs; Max: 2590 ug/L

Trichloroethene - Average: 0.1 ug/L; Mass: 0.00 lbs; Max: 1690 ug/L

Chloroform - Average: 0.1 ug/L; Mass: 0.00 lbs; Max: 15200 ug/L

Clay Aquifer - Freon 113 Above 1.0 ug/l

Total Volume (Including Soil): 17492 cu. yards

Freon - Average: 686.4 ug/L; Mass: 5.06 lbs; Max: 7860 ug/L

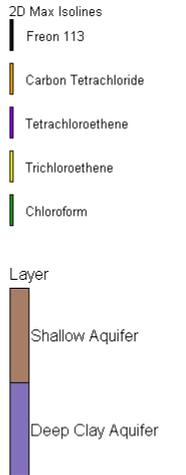
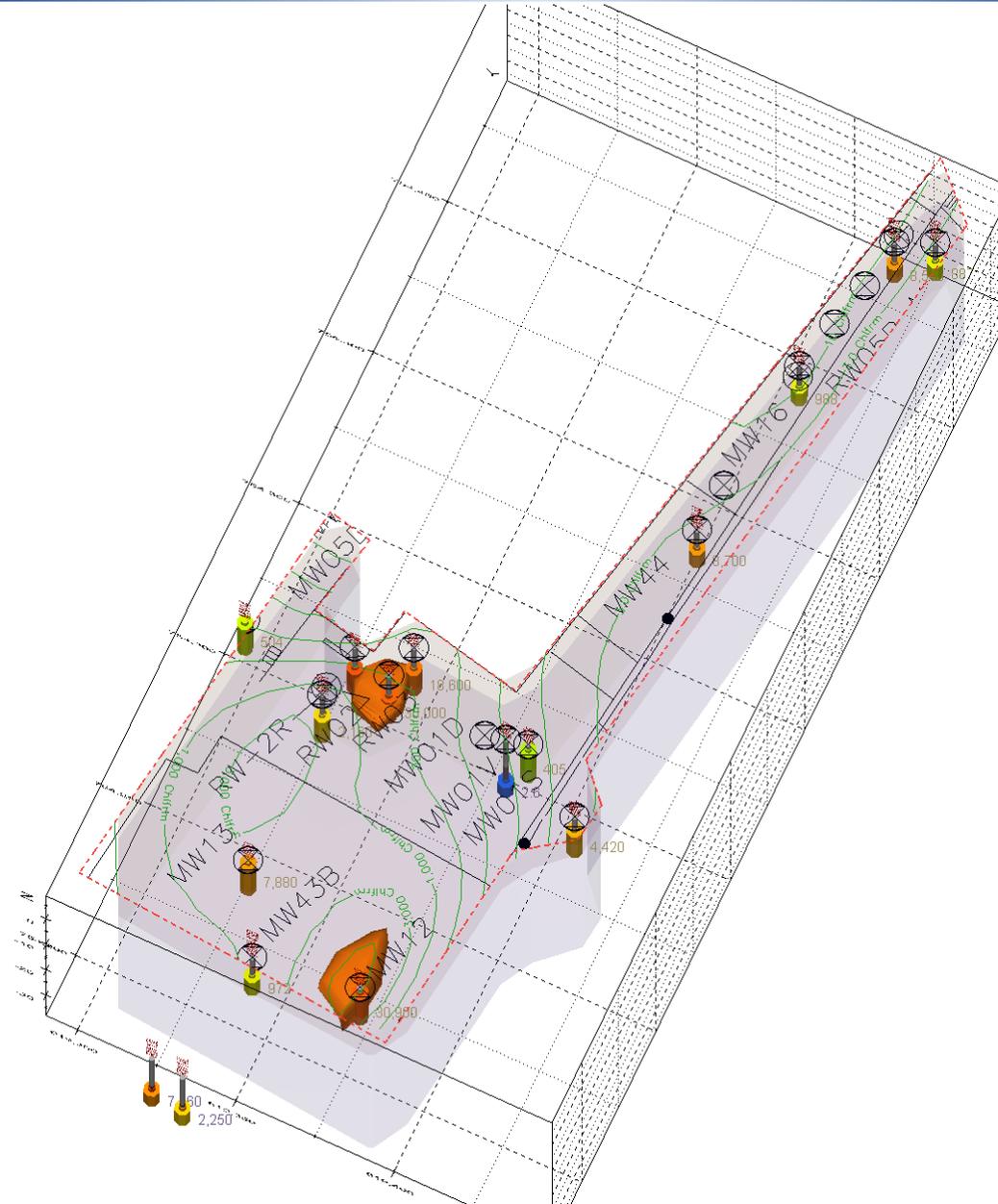
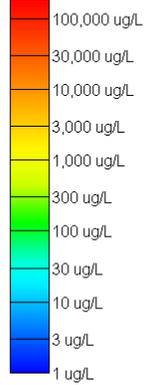
Carbon Tetrachloride - Average: 1.9 ug/L; Mass: 0.01 lbs; Max: 403 ug/L

Tetrachloroethene - Average: 55.7 ug/L; Mass: 0.41 lbs; Max: 969 ug/L

Trichloroethene - Average: 59.9 ug/L; Mass: 0.44 lbs; Max: 999 ug/L

Chloroform - Average: 159.0 ug/L; Mass: 1.17 lbs; Max: 2540 ug/L

Freon 113



*S<sub>2</sub> C<sub>2</sub> inc.*



March 29, 31 and April 1, 2021

# Treatability, Bench, & Pilot Studies

# Treatability, Bench, & Pilot Studies



1996 EPA Environmental Response Training  
Glenn Nicholas Iosue in Level A Suit (right)

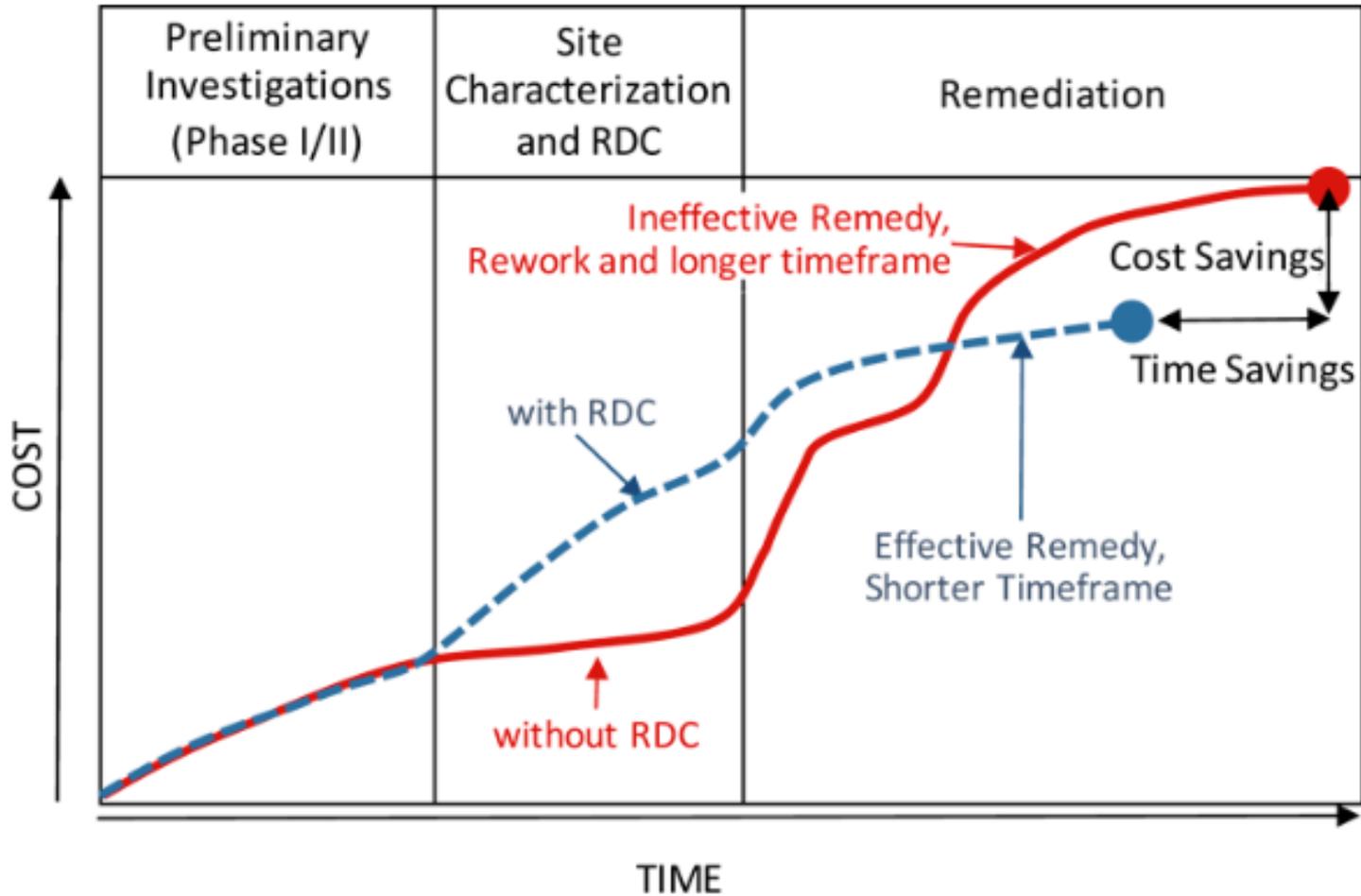


Technology-Based Solutions for the Environment

# Poll Questions

6. What are your primary concerns when choosing/implementing an in-situ remediation (excluding cost)?
  - a. Technology selection
  - b. Feasibility of implementation (contact)
  - c. Managing expectations
  - d. Confidence in the conceptual site model
  
7. Have you had a site where rebound has occurred following implementation of an in-site technology?
  - a. Yes
  - b. No

# Common Pitfalls and BMPs



- Remedial Design Characterization (RDC), or Design Verification Test (DVT)
- Geology
- Mass Flux
- High Resolution Characterization, cost ramifications
- Role of modeling in developing CSM and remedy

Conceptual lifecycle costs with and without RDC / DVT

Source: Modified from ITRC 2015

# Fundamentals of Contaminant Distribution

## Mass Storage

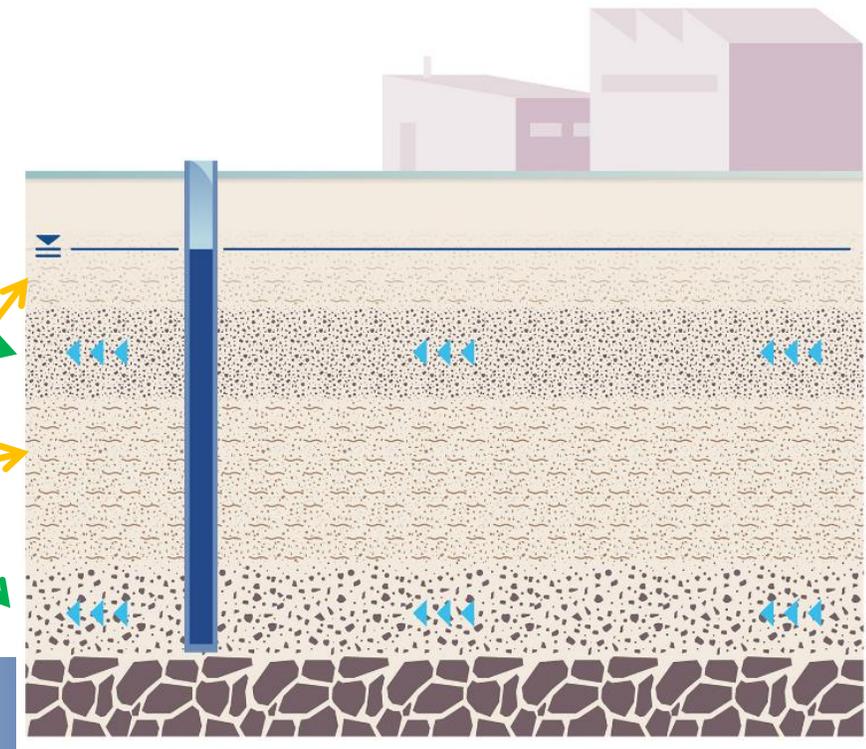
- Relationship of fine and coarse grained units play large role in plume shape

## Contaminant distribution is controlled by soil type positional relationships

- Vertical and lateral relationships between low and high Kh zones are critical
- Remediation is site-specific
  - based on site's specific aquifer characteristics
  - often unique to the site

Higher permeability zones  
"freeways"

Lower permeability zones  
"parking lots"



# Design Verification Process – Why?

**Site Assessments have different objectives than Design Verification, such as**

- Nature and Extent, Plume Boundaries
- Liability and Risk, Sensitive Receptors

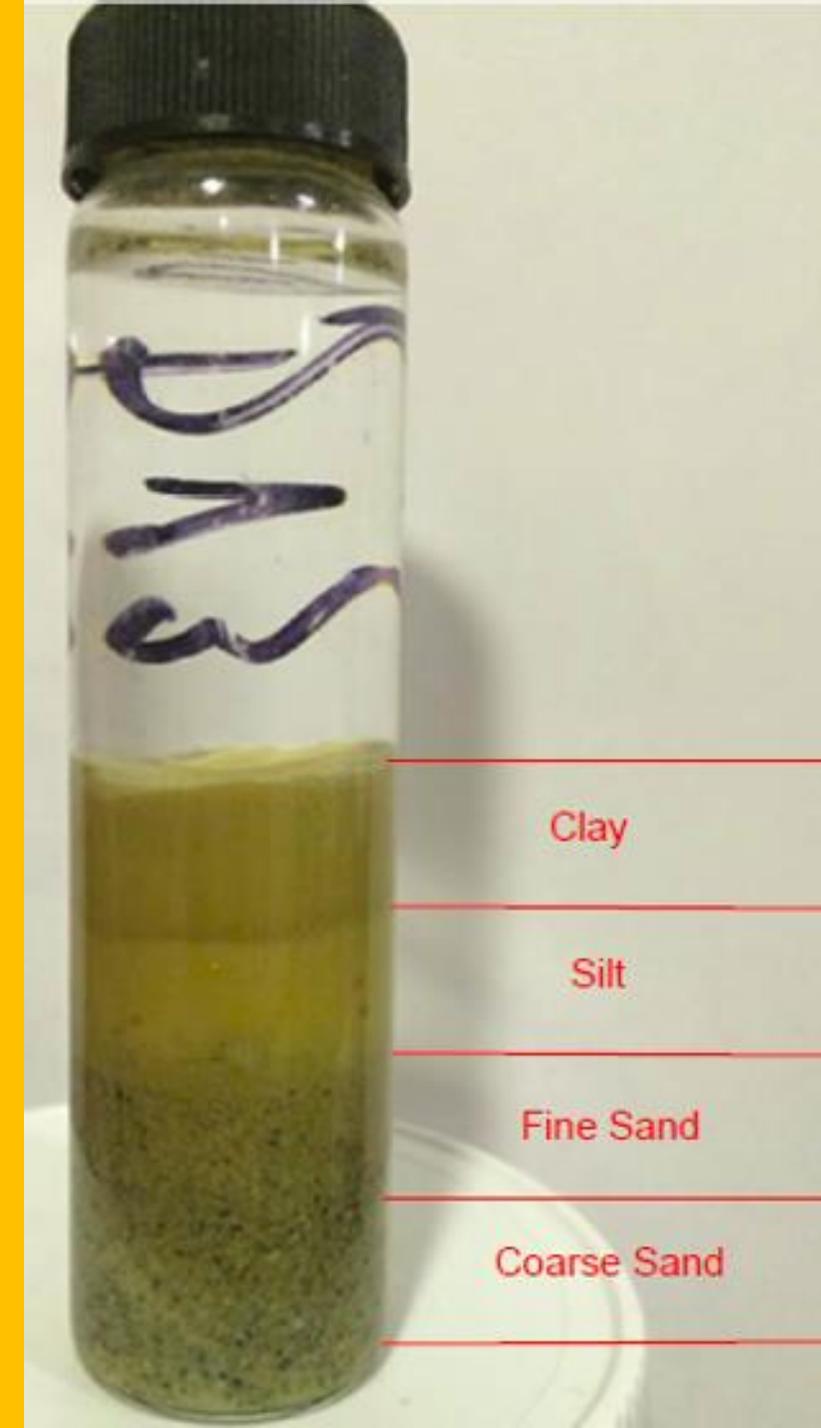
**DVT improves remedial outcome by increasing site resolution**

- Focusing on identifying position of contaminant mass and high flux zones
- Emphasis on identification of principal impacted units
- Provides greater reagent-contaminant contact for improved performance



# Design Verification Tools

- **Continuous Soil Core Logging**  
continuous soil coring into saturated zone used to look at bigger remedial picture and start to map and target horizontal flow pathways
- **Soil Contaminant Analysis**
- **Settling Tubes**
- **Clear Water Injection**
- **Passive Flux Meters**



# Design Verification Test: Clear Water Injection

**Documents acceptance rates and volumes**

- Vertical Target Treatment Zone (TTZ) intervals

**Assists in application decisions**

- Direct Push Injection
  - Top-down vs Bottom-up
- Injection wells
  - Screened Intervals

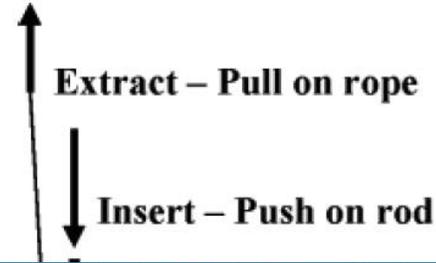
**Data collected often differs greatly  
from estimated Kh based volume**



# Design Verification Test: Unknown Velocity?

## Passive Flux M

- Self Contained  
designed for 2
- Filled with Per
  - Accumulate  
based on fl
- Carbon pre-load  
known sorpti
  - Loses trace  
and flux co

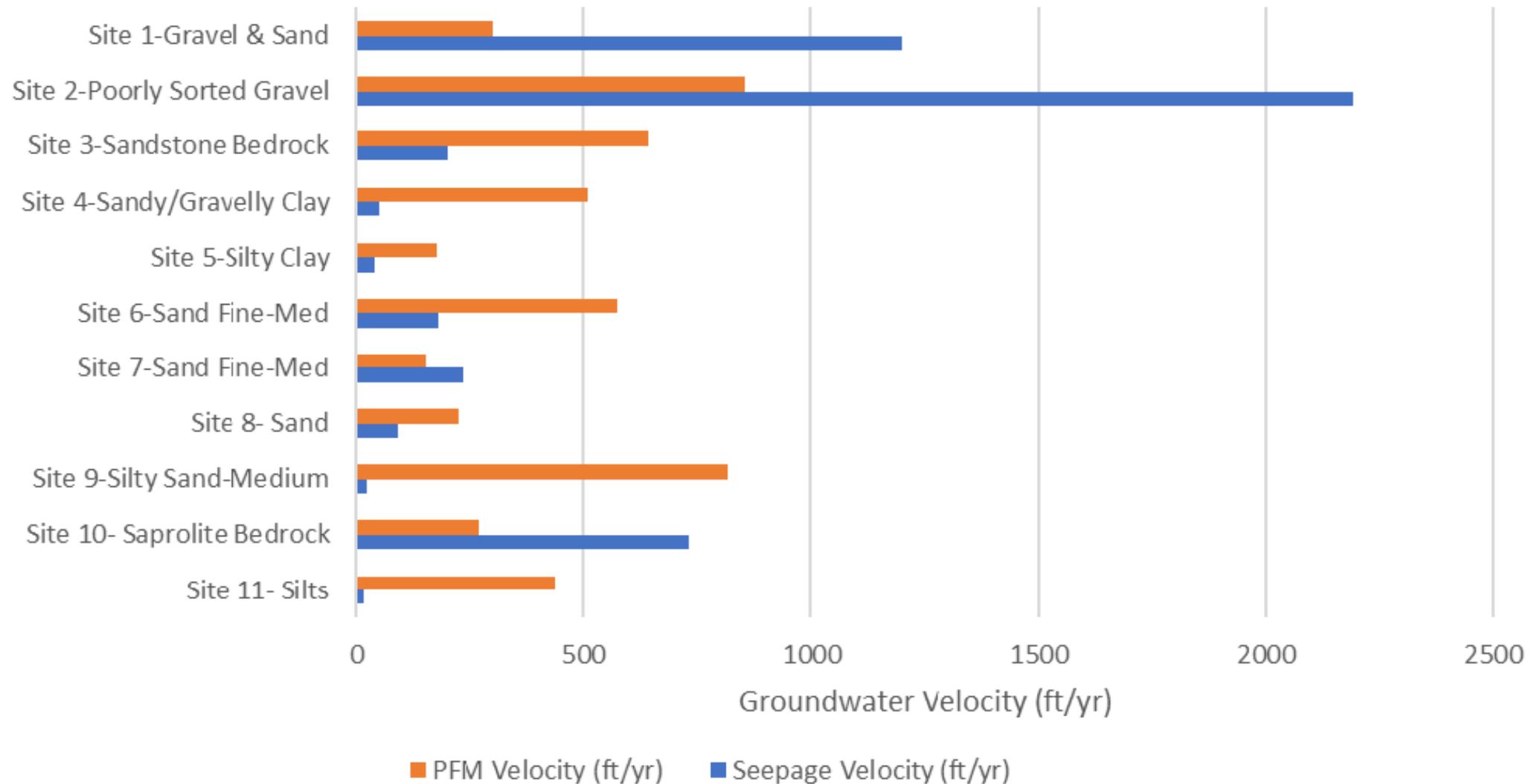


up to connect sock to

cked with activated

ced periodically to

## Passive Flux Velocity & Seepage Velocity



# Design Verification Analysis

## Project Population

- 43 Sites

## Project Design Approach

- 33% source areas
- 67% mid- to distal- plume

## Contaminant Type

- 35% Petroleum
- 61% CVOCs
- 4% Comingled

## General Soil Type

- 50% Fine grained (Clays and Silts)
- 50% Coarse grained (Sand and Gravel)

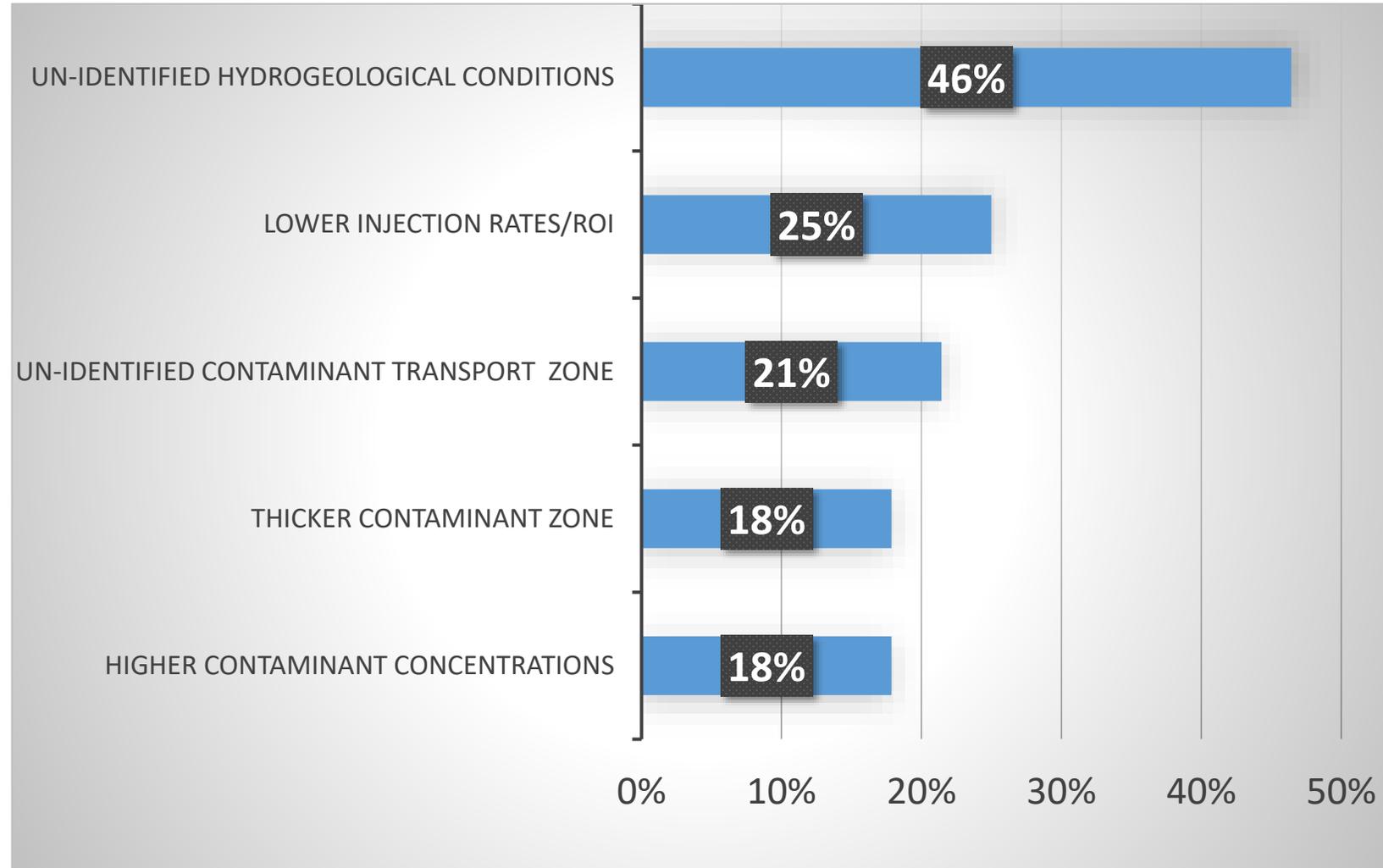
# Analysis of Technical Blind Spots

**What's the outcome?**

**~80% of tests to date found unanticipated results (technical blind spots)**

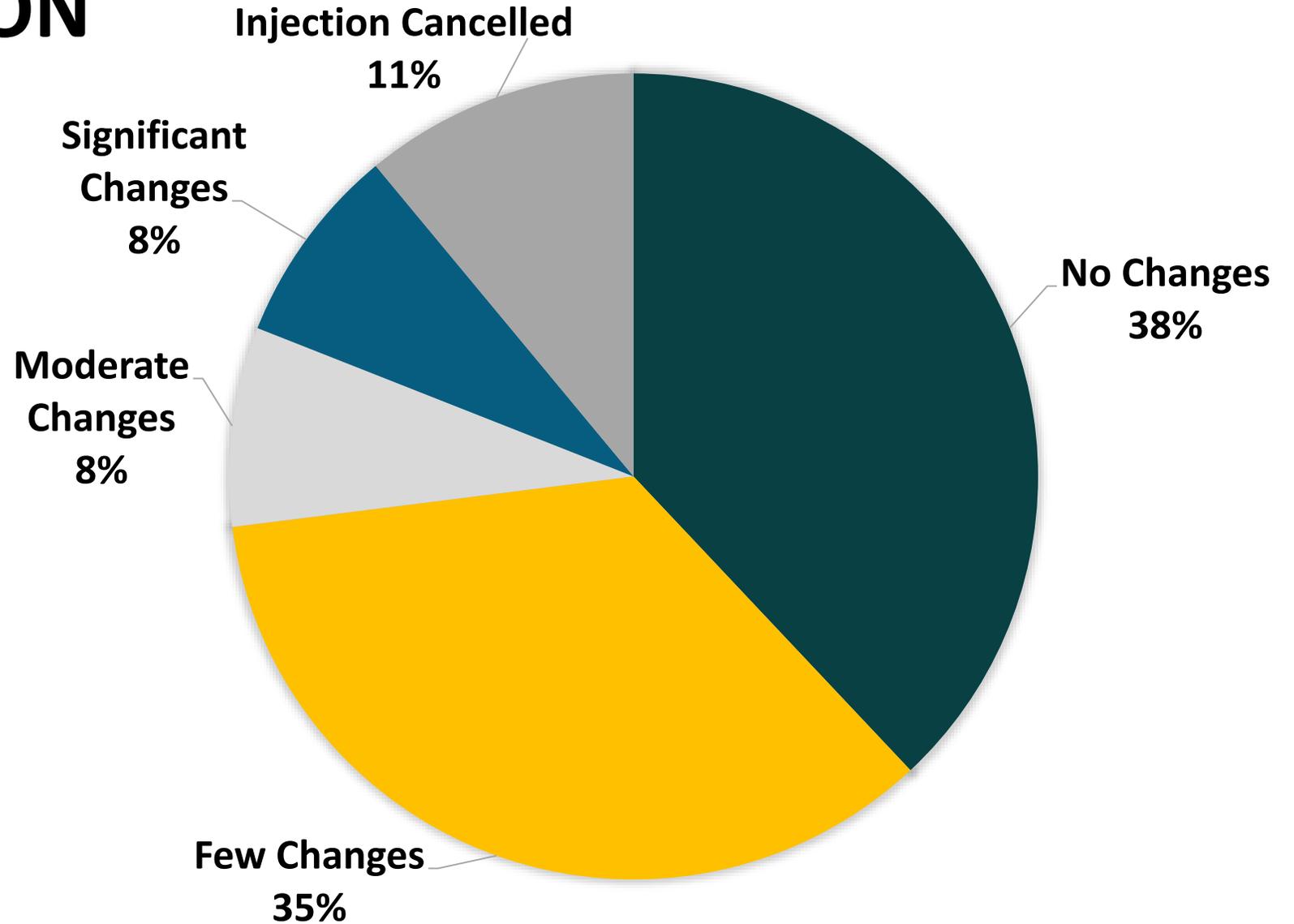
**62% of preliminary designs were modified / refined**

**Most design changes were cost-neutral**



# DESIGN VERIFICATION

## Design Changes



DVT Analysis of 43 Sites

# Lessons Learned: Design Verification Test

- **Depositional Processes significantly control contaminant distribution**
  - Depositional processes are predictable and non-random
  - Design Verification data provides additional remedial insight
- **Design Verification Test improves**
  - Predictability
  - Implementation time and efficiency
  - Early identification of “Technical Blind Spots” and problems
  - Enhances final design and application program outcomes



# Panel Session A

# Implementation

# Hydraulic Fracturing to Deliver Amendments in Low-Permeability Formations and Weathered Bedrock



**Chapman Ross ([cross@frx-inc.com](mailto:cross@frx-inc.com))**

# Poll Question

8. What types of injection delivery methods have you used on your remediation projects (select all that apply)?
- a. Traditional injection wells
  - b. Horizontal injection wells
  - c. Direct-push injection
  - d. Hydraulic fracturing
  - e. Pneumatic fracturing
  - f. Soil mixing
  - g. Slurry wall

# ITRC Injection Optimization Guidance Document

The screenshot shows the ITRC website interface. At the top left is the ITRC logo, which includes the text 'INTERSTATE COUNCIL REGULATORY TECHNOLOGY' around the acronym 'ITRC'. To the right of the logo is a green header bar with the title 'Optimizing Injection Strategies and In situ Remediation Performance' and a 'HOME' button. Below the header is a search bar with the text 'Search this website'. A navigation menu on the left lists the following sections: '1 Introduction', '2 Remedial Design Characterization', '3 Amendment, Dose, and Delivery Design', '4 Implementation and Feedback (Monitoring) Optimization', '5 Regulatory Perspectives', and '6 Community and Tribal Stakeholder Considerations'. The main content area features a large 'Welcome' message and a diagram of an injection well. The diagram shows a cross-section of the ground with a well casing and a screen. Arrows indicate the flow of fluid from the well into the surrounding subsurface, which is depicted with different colored layers representing soil and groundwater.

<https://ois-isrp-1.itrcweb.org/>

# ITRC Guidance Document – Delivery Techniques

Delivery Technique	Direct Push Injection (DPI) [D1]	Injection Through Wells & Boreholes [D2]	Electrokinetics This is injection through wells. [D3]	Solid Injection [D4]		Permeable Reactive Barriers (PRBs) [D7]
				Hydraulic Delivery Through Wells & Boreholes [D5]	Pneumatic Delivery Through Open Boreholes [D6]	
Hydrogeologic Characteristics <a href="#">Unified Soil Classification System</a>						
Gravels	• (Sonic)	•	NA	NA	NA	•
Cobbles	• (Sonic)	•	NA	NA	NA	•
Sandy Soils (Sm, Sc, Sp, Sw)	•	•	NA	▣	▣	•
Silty Soils (Ml, Mh)	•	▣	•	•	•	•
Clayey Soils (Cl, Ch, Oh)	•	▣	•	•	•	•
Weathered Bedrock	•	•	▣	•	•	▣
Competent/Fractured Bedrock	NA	•	NA	▣	▣	▣
$K \leq 10^{-3}$ to $10^{-4}$ (Low Perm Soils)	•	▣	•	•	•	•
$K \geq 10^{-3}$ (High Perm Soils)	•	•	▣	▣	▣	•
Depth > Direct Push Capabilities	NA	•	▣	▣	▣	▣

Match delivery method with geology



Table 3-4

<https://ois-isrp-1.itrcweb.org/>

"Widely used = •", "Site-specific = ▣", and "Not applicable = NA"



March 29, 31 and April 1, 2021

# Hydraulic Fracturing of Solid Amendment



# ITRC Guidance Document - Amendments

Match amendments  
with contaminants  
AND  
delivery method

Treatment Type	Description/Summary	Target COCs	Typical Injection/Emplacement Technologies Methods
<b>Common Biotic Amendments (A.1)</b>			
Anaerobic (A1.3) biological reduction	Contaminants are degraded via a reductive process by certain types of microbes under anaerobic conditions. Fermentable organic substrates are injected or placed into the subsurface to enhance the production of hydrogen, which is in turn used by the microbes in the reductive reactions.	<ul style="list-style-type: none"> <li>Chlorinated solvents</li> <li>Many pesticides and munitions</li> <li>Certain inorganic compounds</li> <li>Petroleum hydrocarbons (typically by introduction of electron acceptors such as nitrate and/or sulfate)</li> </ul>	<ul style="list-style-type: none"> <li>Direct push injection</li> <li>Permanent injection wells</li> <li>PRBs</li> </ul>
<b>Abiotic Amendments (A2)</b>			
Chemical oxidants (A2.1)	Oxidants delivered to the subsurface degrade or transform contaminants via oxidation and reduction reactions in the vadose and saturated zones. Oxidants can be used for source area remediation in conjunction with other compatible remedial alternatives to address downgradient areas with dissolved-phase or lower concentrations. Reaction rates depend on temperature, pH, reactant concentrations, activators or stabilizers, reaction byproducts, natural organic materials, and oxidant scavengers. Activators, stabilizers, and chelating agents may be used to enhance the subsurface oxidation reactions.	<ul style="list-style-type: none"> <li>BTEX</li> <li>MTBE</li> <li>TPH</li> <li>Chlorinated solvents</li> <li>SVOCS</li> <li>Energetics</li> <li>1,4-dioxane</li> </ul>	<ul style="list-style-type: none"> <li>Trenching/soil mixing</li> <li>Direct push injection</li> <li>Permanent injection wells</li> <li>Soil mixing</li> <li>Permeability enhancement (i.e., environmental fracturing)</li> <li>Recirculation</li> <li>Slow-release oxidant cylinder (Evans 2018)</li> <li>Ozone sparging</li> </ul>
Chemical reducing compounds for degradation enhancement (A2.2)	In general, reducing agents degrade or chemically transform contaminants into potentially less toxic and less mobile forms. The reductive processes depend on the contaminant, the type of reduction, and natural processes in the subsurface.	<ul style="list-style-type: none"> <li>Metals and metalloids</li> <li>Chlorinated solvents</li> <li>Energetics</li> </ul>	<ul style="list-style-type: none"> <li>Trenching/soil mixing</li> <li>Direct push injection</li> <li>Permanent injection wells for very fine zero-valent iron (ZVI) products and calcium polysulfide</li> <li>Hydraulic and pneumatic emplacement</li> </ul>



Table 3-2  
<https://ois-isrp-1.itrcweb.org/>



March 29, 31 and April 1, 2021

# Solid Amendment Options



# Mass Loading and Cost

- Costs for treatment using hydraulic fracturing
  - \$50-150/CY for ZVI treatment of chlorinated solvents  
(costs for range of treatment from diffuse plume to DNAPL source zone)
- Hydraulic fracturing is capable of delivering much higher mass loading than traditional injection methods.
  - ZVI mass loading of >3% (by dry weight soil) is readily achievable



# Horizontal Remediation Wells, Challenges and Benefits

**MARK STRONG, JACOBS ENGINEERING**



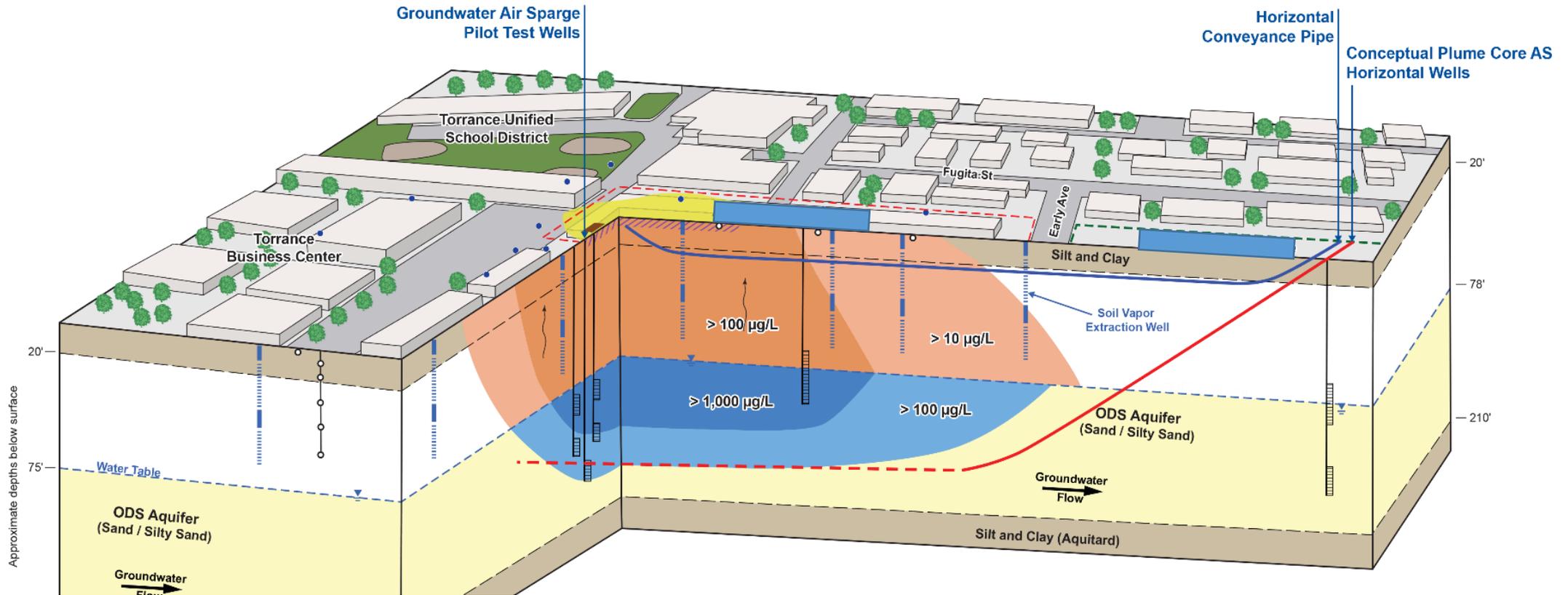
# Remediation Industry Experience with HDD

- First environmental wells installed in late 80s (DOE - Savannah River), continued development in 90s, several technical challenges.
- Mid to late 2000s, improved installation methods and more successful installations.
- Current and Historical Applications:
  - Air Sparging (AS) and Soil Vapor Extraction (AS/SVE)
  - Groundwater/NAPL pumping
  - PRBs, slope stabilization, landfill drains, etc
  - Liquid injection
  - Horizontal Heaters/ERH
- Developing Sustainable Remediation Options:
  - Passive/limited infrastructure treatment cells such as Arcadis HRX or coaxial treatment wells

# Why Directional Drilling

- Plume Access
- Contact Efficiency
- Decreased Site Impact
- Cost (for large plumes, less infrastructure, I&C, conveyance lines, etc – simpler O&M)

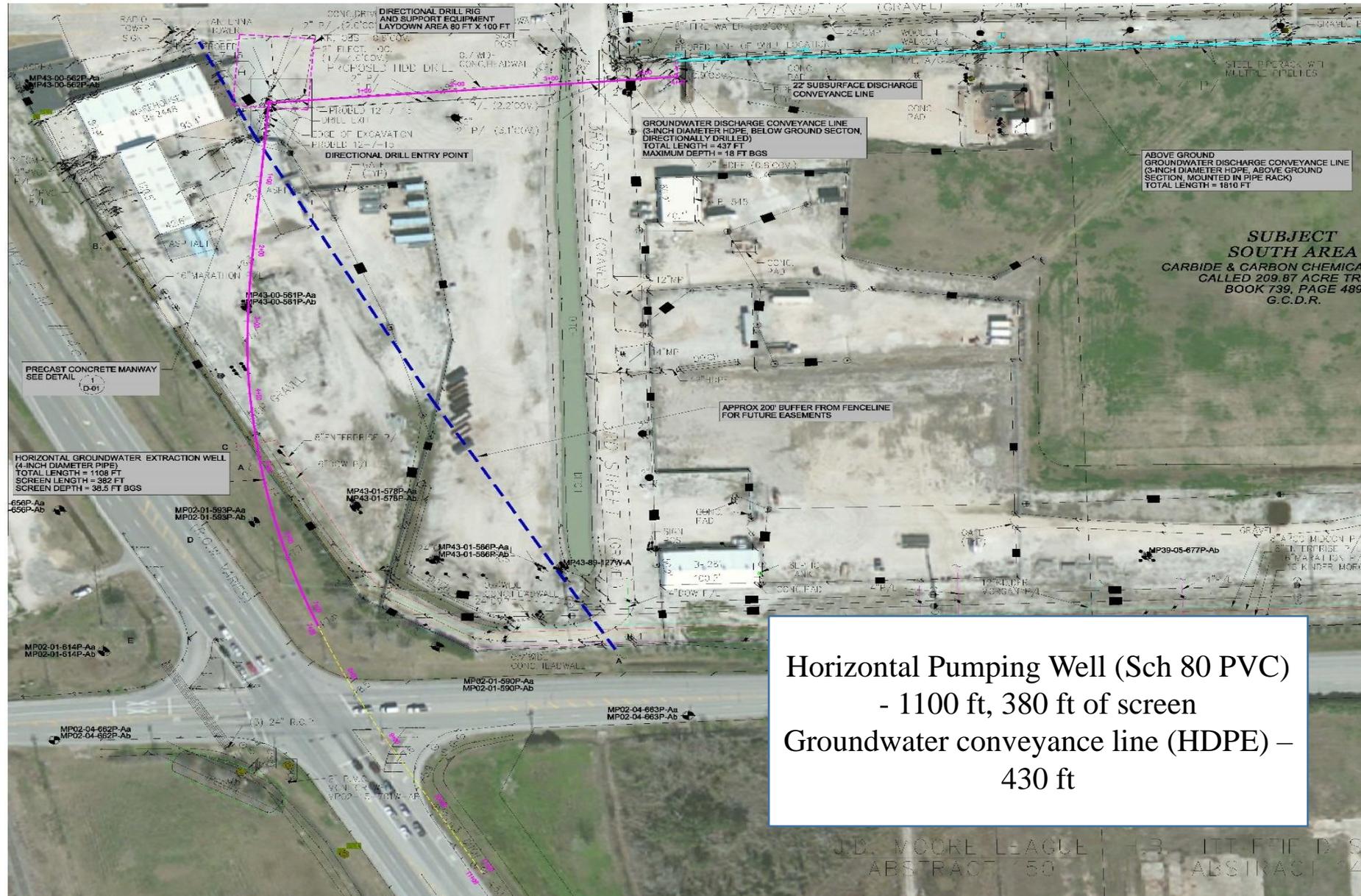




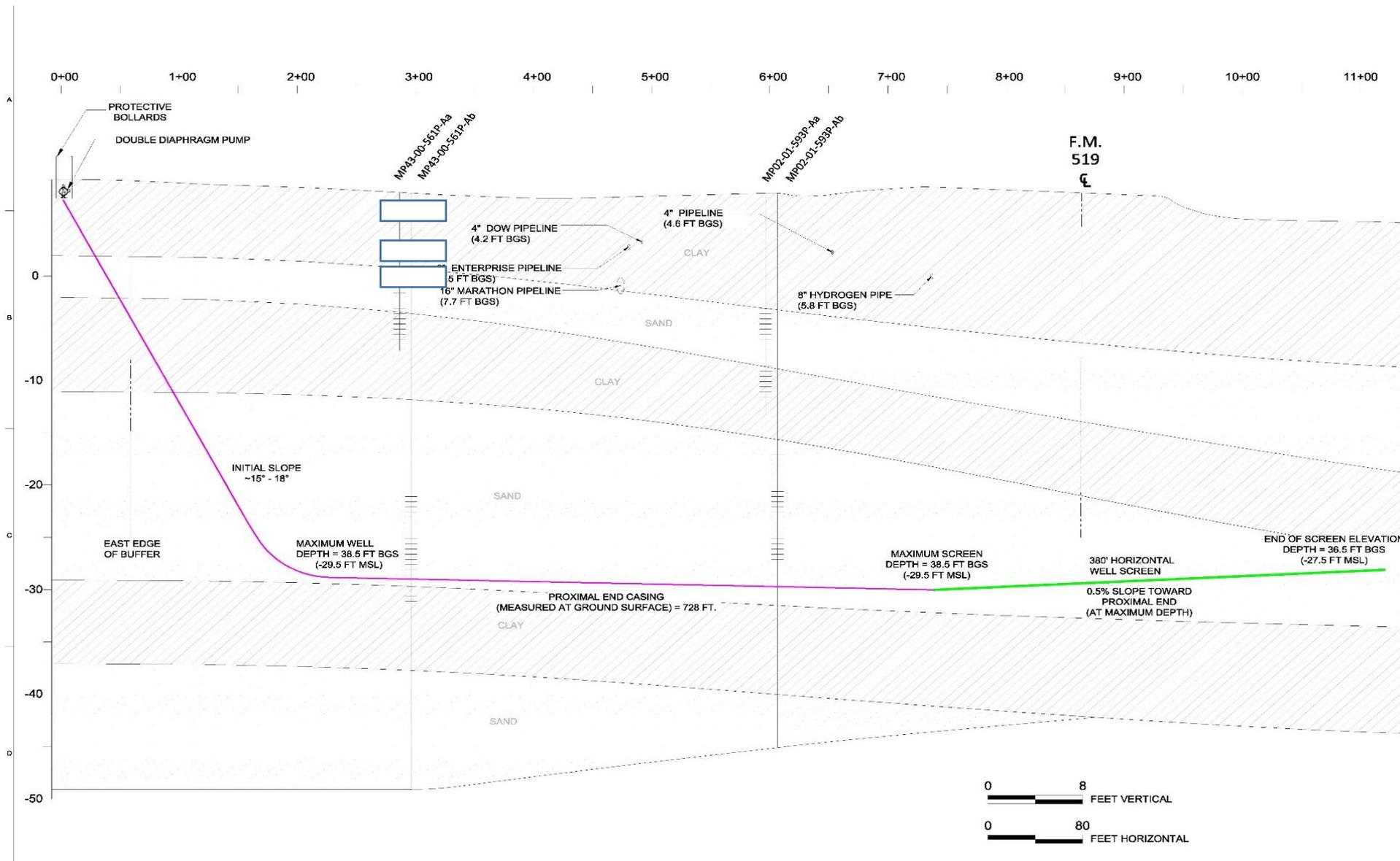
- Blind end drilling in sands
- Gyro steering tools that do not require surface access
- Cased well installation techniques facilitate use of lower cost well materials
- Improved accuracy of navigation at depths exceeding 100 ft bgs

## Recent Developments

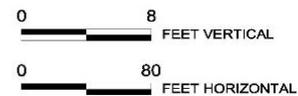
Case Study –  
Groundwater Plume  
Containment, Industrial  
Client, South Texas



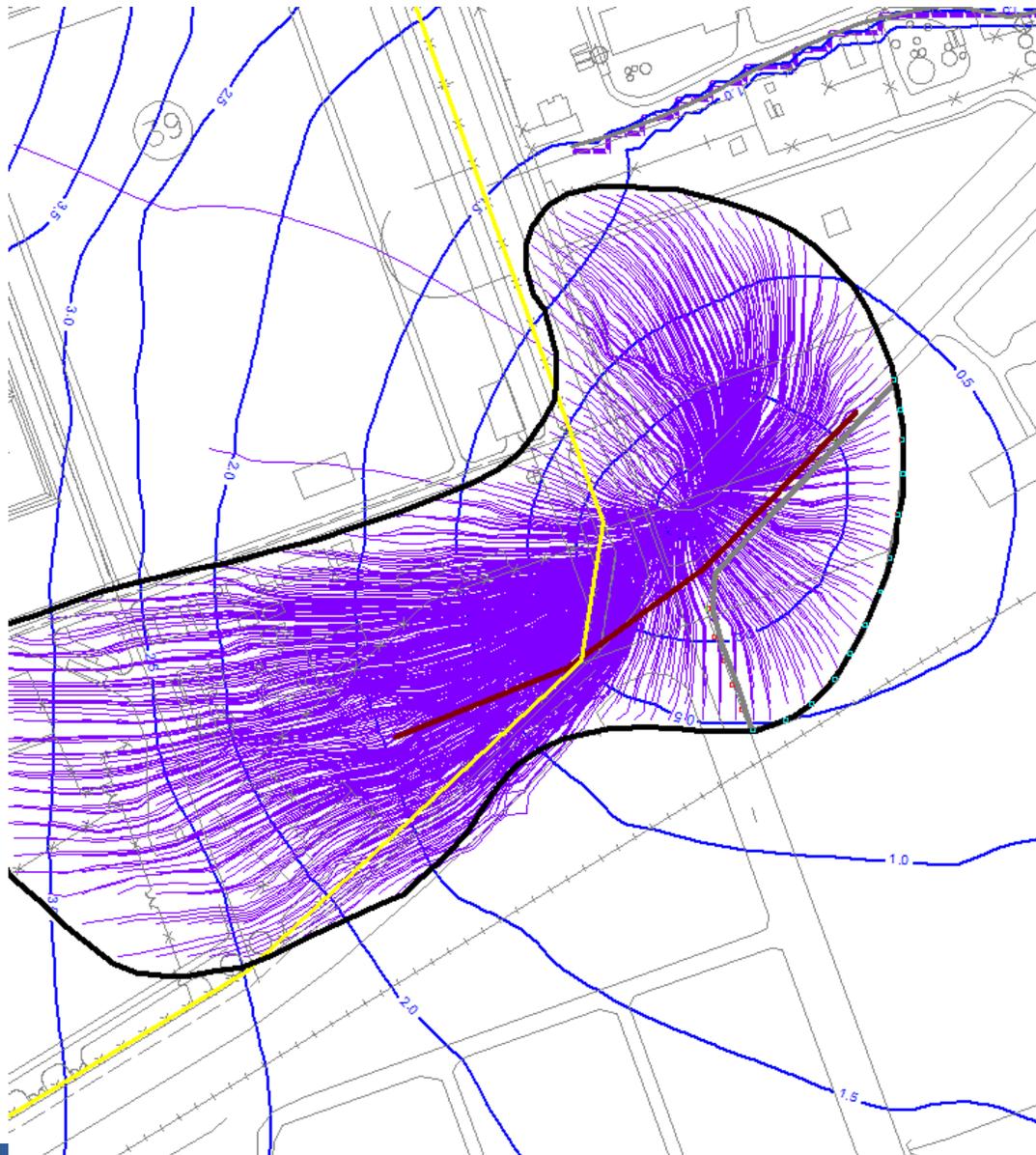
Horizontal Pumping Well (Sch 80 PVC)  
- 1100 ft, 380 ft of screen  
Groundwater conveyance line (HDPE) –  
430 ft



Cross Section



NDM LOCATION: NWO FILENAME: HW\_XSEC\_1 PLOT DATE: 09-03-2015

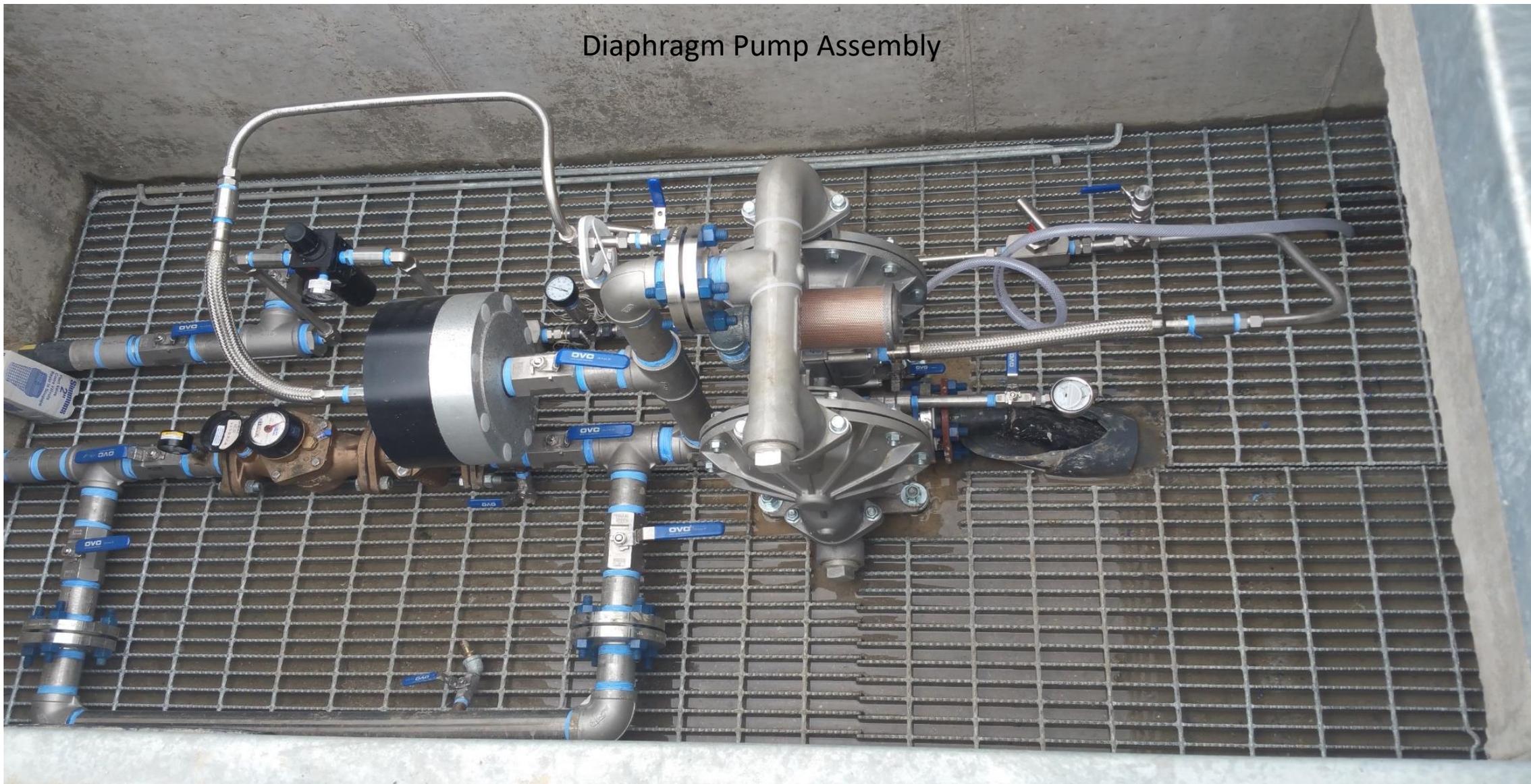


- Model output 380 ft screen at 30-40 ft bgs, 12 gpm
- Particle tracks and water level contours
- Field data indicated capture zone stabilization in ~3 weeks

## Pre-Cast Vault



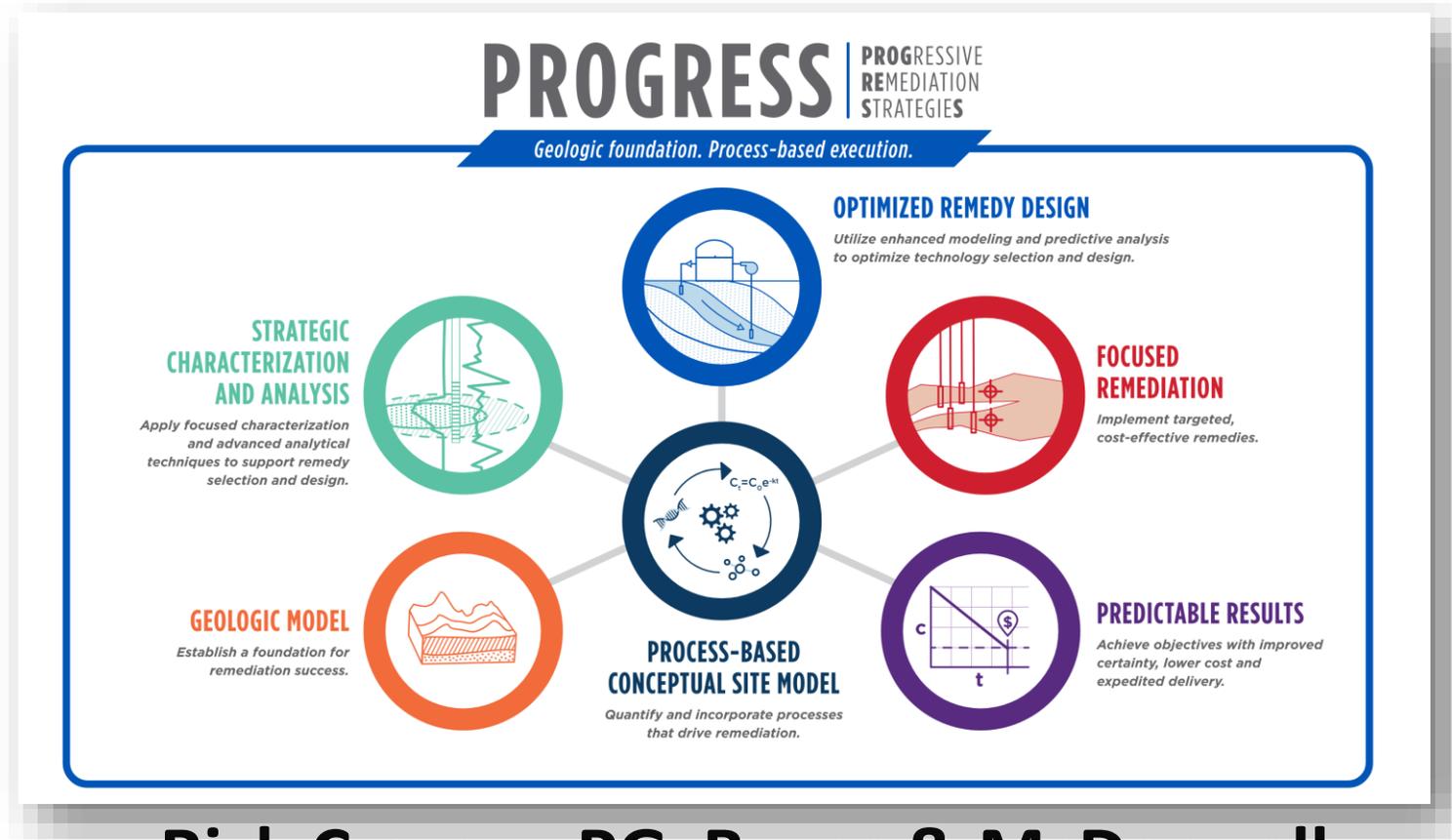
Diaphragm Pump Assembly



# Panel Session B

# Optimization

# Geology-Focused Approach to Optimize In-Situ Groundwater Remediation



**Rick Cramer, PG Burns & McDonnell**

# Poll Questions

8. Have you completed an Environmental Sequence Stratigraphy (ESS) or depositional based evaluation of geologic conditions as part of an in-situ design?
- a. Yes
  - b. No

# Geologic Model

*Establishes a foundation for remediation success*



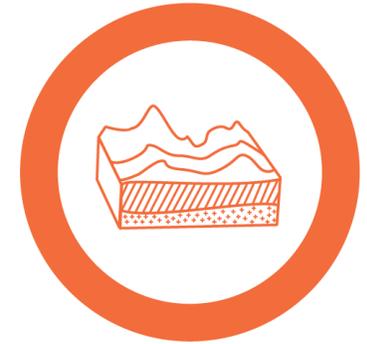
- Use “better science” to map contaminant transport, transition and storage zones
- “Untangle” heterogeneity and establish accurate geologic framework with clearly defined Hydrostratigraphic Units (HSUs)
- Develop a *framework and structure* that brings focus and efficiency to site investigation and remediation
  - Conceptual Structure AND Data Structure (Digital CSM)

***Groundwater lives in and is controlled by the Geology***

*Dr. J.H. Birman GSi/water, 1996*

# Geologic Model

*Direct relationship to subsurface processes*



▶ **Hydraulic processes (primarily advection, but also dilution and dispersion)**

- **Geologic Model** provides the permeability architecture to evaluate hydrogeologic properties.

▶ **Matrix diffusion processes**

- Permeability architecture (transport/storage zones) and distribution of organic carbon defined in the **Geologic Model**.

▶ **Adsorption/desorption**

- Organic carbon distribution is defined by the **Geologic Model** and hydrogeologic setting and conditions.

▶ **Biological degradation**

- **Geologic Model** and aquifer hydraulics can inform geochemical conditions that affect prevalence (or viability) of requisite organisms, functional genes, electron donors/acceptors, nutrients etc.

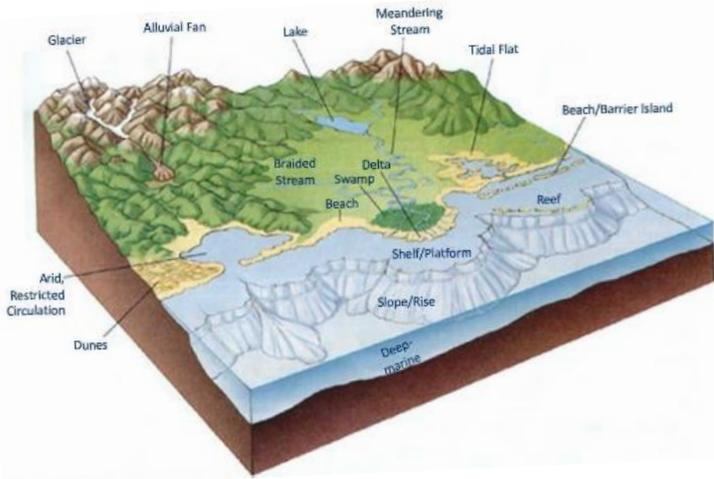
▶ **Abiotic degradation**

- **Geologic Model** and aquifer hydraulics can inform geochemical conditions that affect prevalence (or viability) of requisite reactants, redox conditions, processes, etc.

▶ **Environmental forensics**

- **Geologic Model** defines the contaminant migration pathway, essential to all forensic analyses.

# The Environmental Sequence Stratigraphy (ESS) Process



LOG of well No. 371 K SHEET 1

Time	To	Description of interval	Note	To	Classification of interval
27	28	NO SAMPLES TO 30'			
28	34	Clay, gray, with interbedded fine sand, abundant shells			
34	36	Clay, gray			
36	46	Sand, fine to silty, gray, silty fine			
46	53	Clay, gray, silty, shaly, with 1/2" gray, fine, sand bed @ 51' - 52'			
53	56	Sand, cemented, gray			
56	63	Sand, fine to medium, gray			
63	74	Sand, medium gray with 1/2" gravel to 3/4" and a trace of wood			
74	100	Sand, medium to coarse, gray with pebbles and a few small cobbles to 3/4"	Some clay balls @ 81' to 91'		
100	105	Clay, gray			
105	114	Sand, medium to coarse with gravel and a few cobbles to 3/4" diameter			
114	137	Sand, medium to very coarse, with cobbles to 3/4" dia, and up to 100 grains			
137	145	Clay, gray with shells			
145	150	Silt, fine sandy, gray			
150	154	Clay, gray			
154	186	Silt, fine sandy, gray with a few increasing pebbles with shells from 100' to 186'			

Reference: 278 - 282' CONTROL ON SHEET 1A

Scale: 1" = 10'

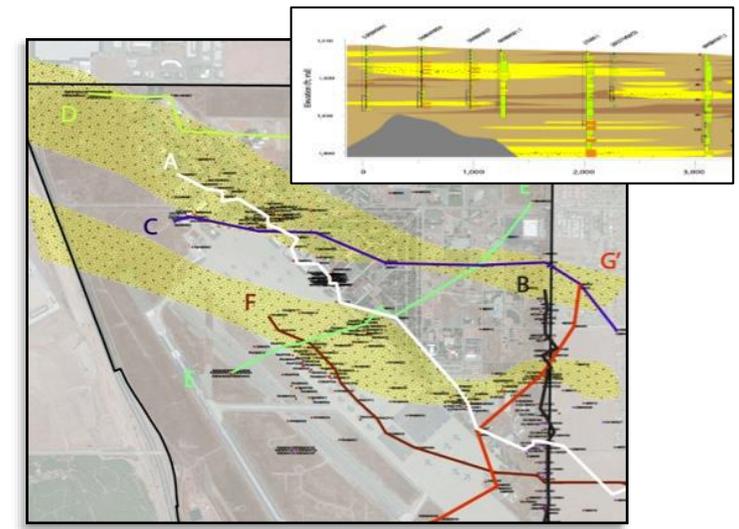
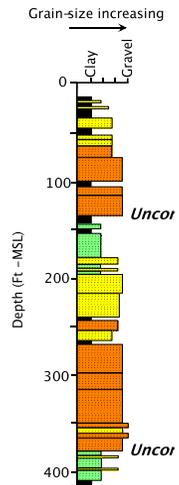
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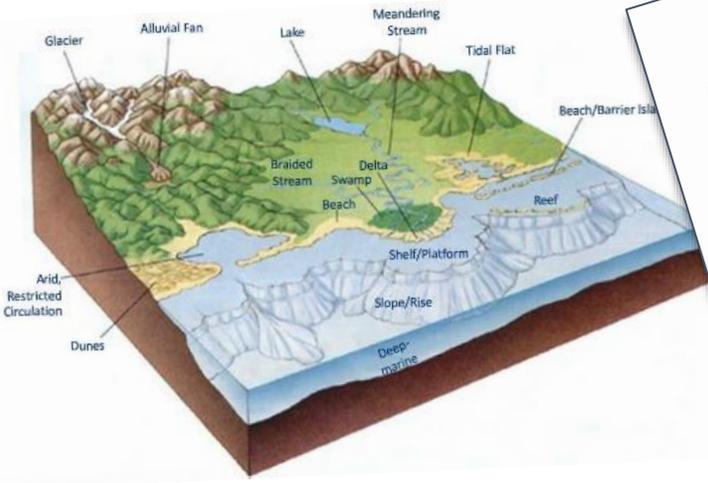


**1** Research regional geology to determine depositional environment, the foundation of the ESS evaluation.

**2** Leverage existing lithology data: vertical grain size patterns indicative of genetic relationships.

**3** Map and predict the subsurface permeability architecture away from the data points.

# The Environmental Sequence Stratigraphy (ESS) Process



1

Research regional geology to determine depositional environment, the foundation of the ESS evaluation.

EPA/##/R-###/###

**Ground Water Issue**

United States Environmental Protection Agency

**Best Practices for Environmental Site Management:**  
A Practical Guide for Applying Environmental Sequence Stratigraphy to Improve Conceptual Site Models

Michael R. Shultz  
Richard S. Cramer  
Colin Plank  
Herb Levine

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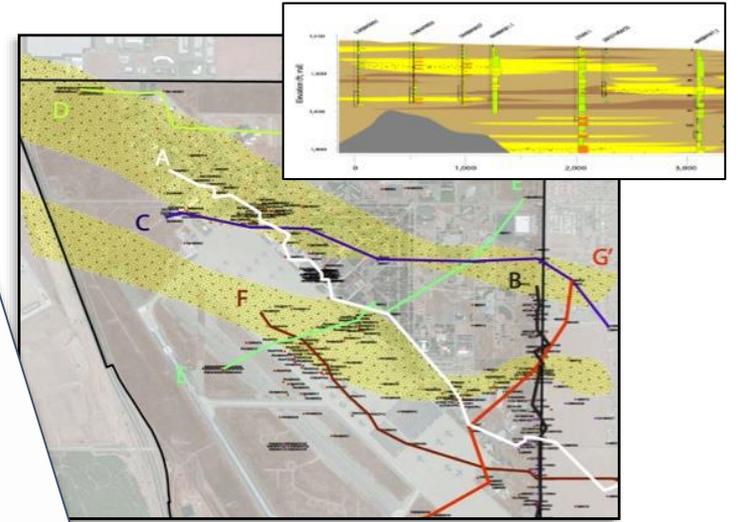
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**BACKGROUND**

This issue paper was prepared at the request of the Environmental Protection Agency (EPA) Ground Water Forum. The Ground Water, Federal Facilities, and Engineering Forums were established by professionals from the United States Environmental Protection Agency (USEPA) in the ten Regional Offices. The Forums are committed to the identification and resolution of scientific, technical, and engineering issues impacting the remediation of Superfund and RCRA sites. The Forums are supported by and advise Office of Solid Waste and Emergency Response's (OSWER) Technical Support Project, which has established Technical Support Centers in laboratories operated by the Office of Research and Development (ORD), Office of Radiation Programs, and the Environmental Response Team. The Centers work closely with the Forums providing state-of-the-science technical assistance to USEPA project managers. A compilation of issue papers on other topics may be found here:  
<http://www.epa.gov/superfund/remedytech/tsp/issue.htm>

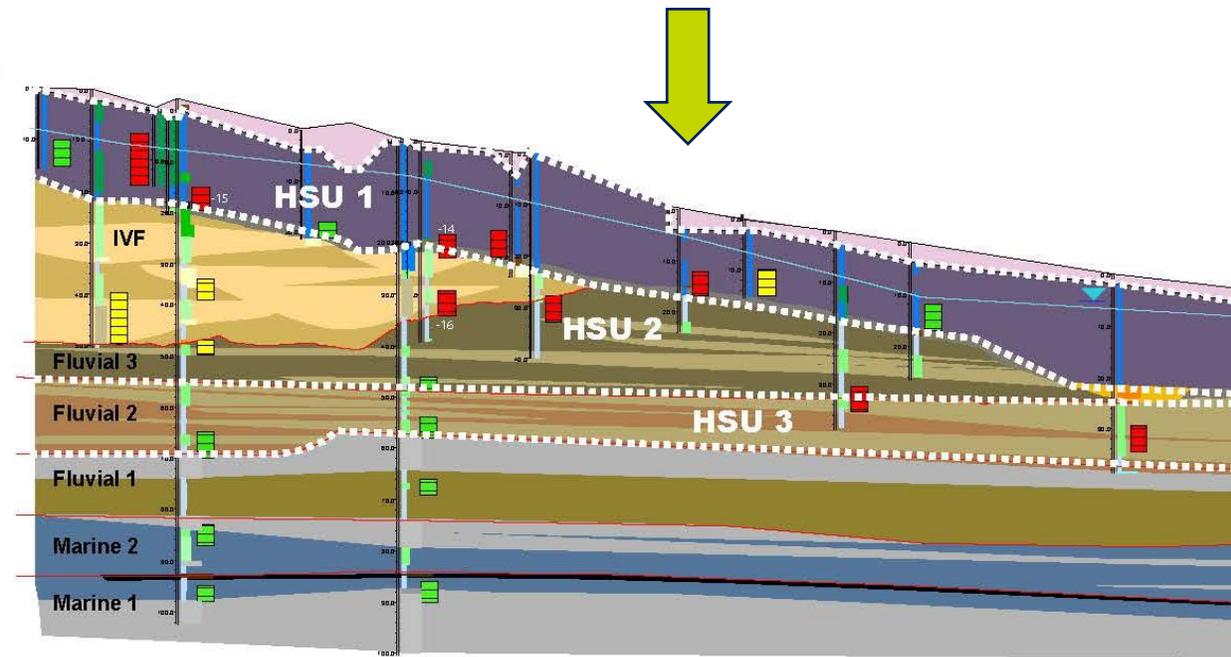
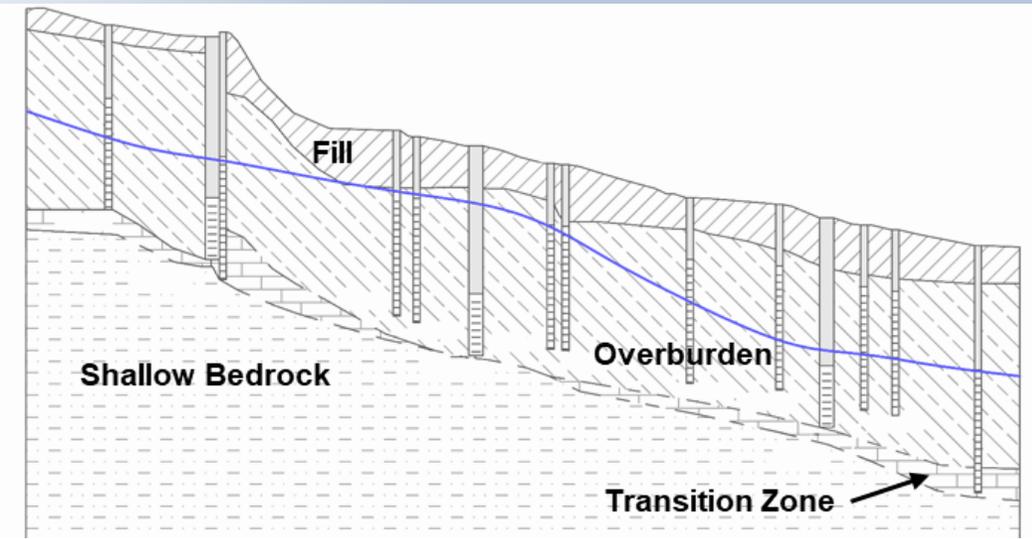
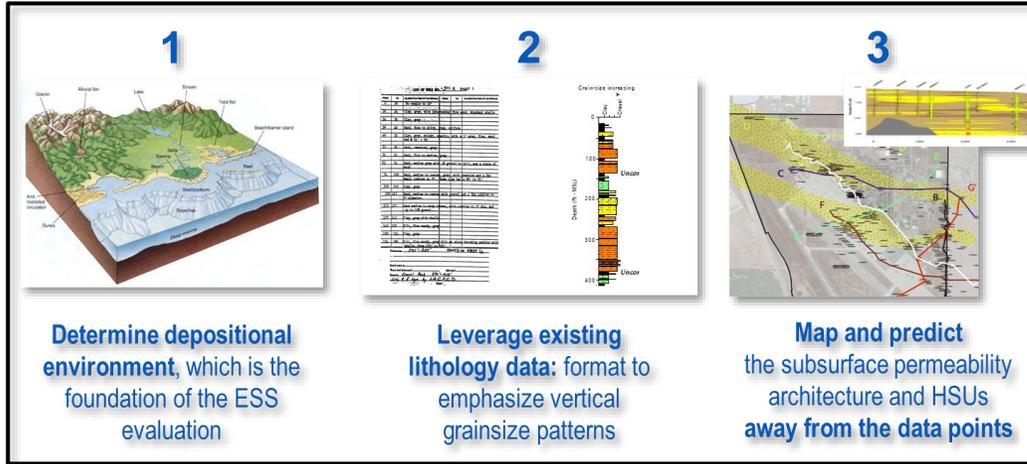
The purpose of this issue paper is to provide a practical guide to practitioners on application of the geologic principles of sequence stratigraphy and facies models to the characterization of stratigraphic heterogeneity at hazardous waste sites.

This document was prepared under the U.S. Environmental Protection Agency National Decontamination Team Decertification Analytical And Technical Service (DATS) II Contract EP-W-12-26 with CSS-Dynamics, 10301 Democracy Lane, Suite 300, Fairfax, Virginia 22030

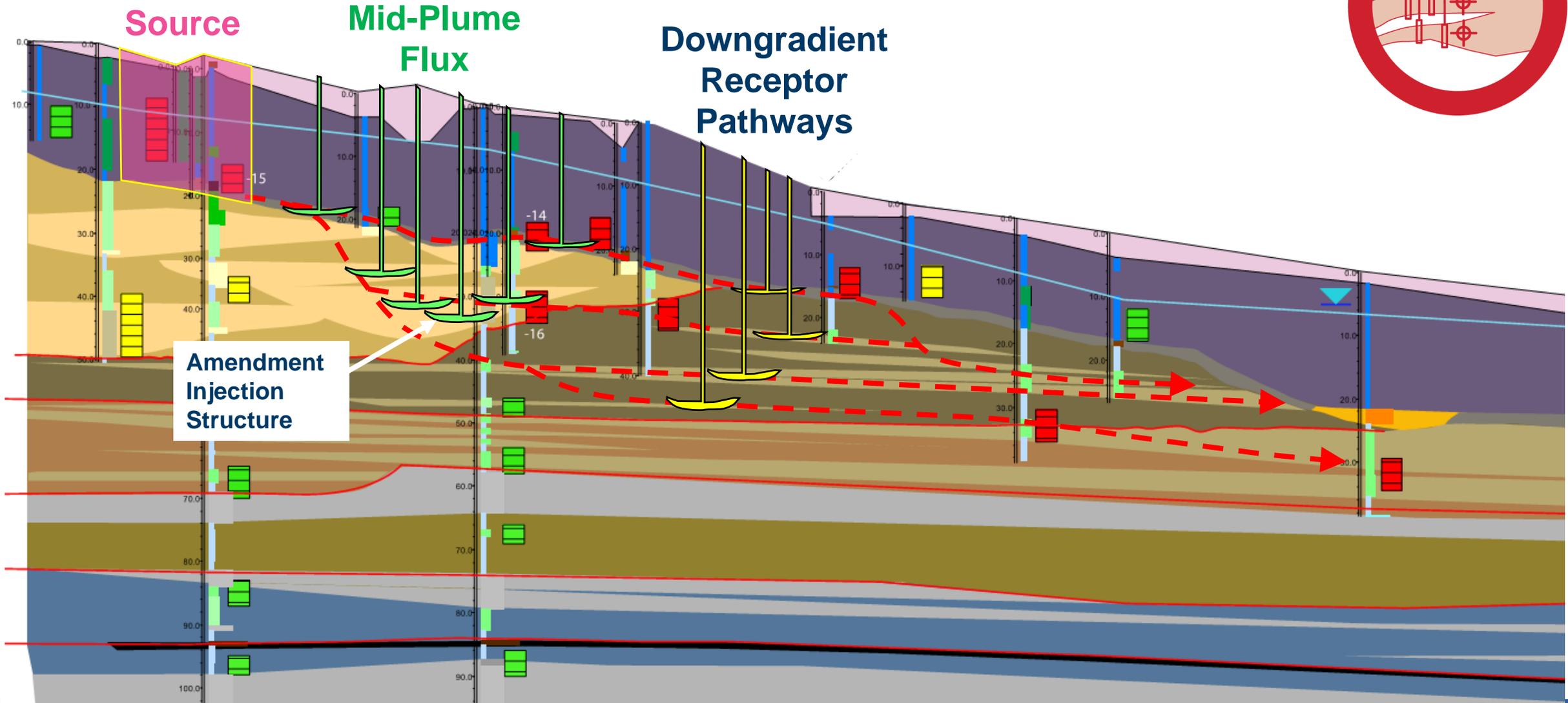
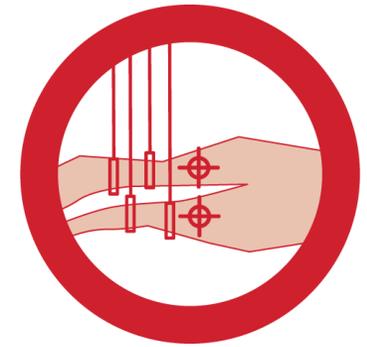


Map and predict the subsurface permeability structure away from the data points.

# The Geologic Model



# Focused Remediation



# Panel Session C