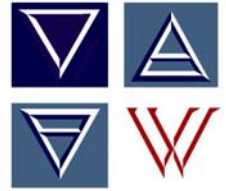


Project Name: Confidential Litigation Support— Chlorinated Solvent Impact: Former Dry Cleaners at Retail Shopping Center



General Project Description and Services Provided

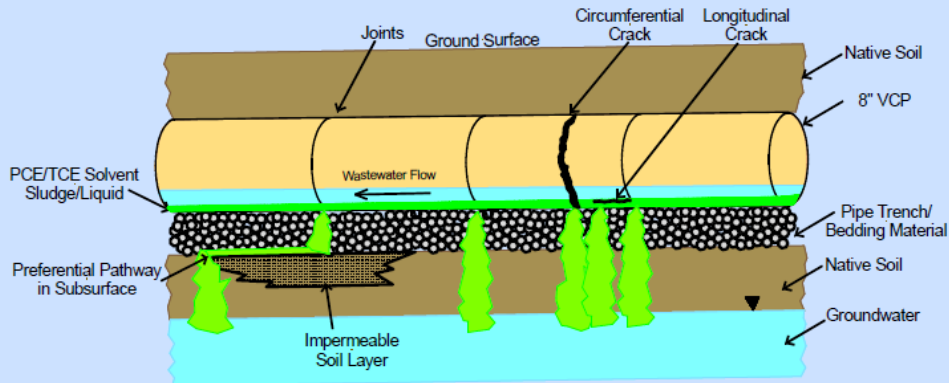
Waterstone provided litigation support to the owner of a retail center with groundwater impacted by chlorinated solvents. Waterstone provided expert witness deposition and trial testimony to demonstrate that solvents originated from defects in an offsite sanitary sewer and had migrated beneath the plaintiff's facility. The solvents had been discharged to the sanitary sewer from an automotive repair shop formerly located on the Subject Property and a former dry cleaning operation at the retail center. In addition, a smaller release of PCE had occurred onsite from the former dry cleaning facility. Research of the surrounding area did not identify any other potential sources. Waterstone personnel designed a sampling plan performed by plaintiff's consultant which confirmed that the sewer was the source of groundwater impact. A cost estimate was prepared for remediation of the groundwater in accordance with the requirements of the Los Angeles Regional Water Quality Control Board. The court ruled in favor of plaintiff on causation and the case was settled.



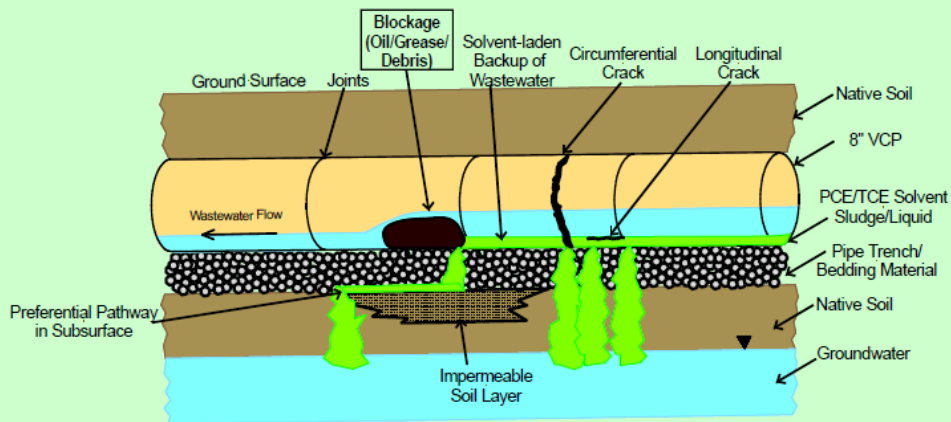


Solvent Release Scenarios from a Sewer Pipeline

**JOINTS AND
CRACKS**



BLOCKAGE



Key Project Highlights

- ◆ The source of chlorinated solvent impact was determined using 3-D analysis following a detailed sub-surface investigation.
- ◆ Forensic analysis indicated multiple sources and source areas historically located at the site. Also, different contaminants were released by the different sources.
- ◆ Sewer lines were traced at the property and in the street to find additional potential sources.
- ◆ New remediation techniques including electrical resistive heating were evaluated to determine the most efficient and economical method of remediating the site.
- ◆ The court ruled in favor of plaintiff on causation and the case was settled.