RISK-BASED ASSESSMENT AND CLOSURE PROJECT CAPSULES

1. Former Reduction Works – Colorado Springs, Colorado
Paragon attended meetings with attorneys, the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency to develop a strategy for redeveloping the property and reviewed historical technical documents. Assessment tasks included preparation of a Voluntary Cleanup (VCUP) Risk Assessment Report for the entire site; a tenant walk through; completing test pit excavations; collecting and logging soil samples; evaluating test pit soil sample results; coordinating and observing drilling activities; and completing a groundwater quality assessment. Based on the assessment results and meetings with the regulatory agencies, Paragon developed a strategy of completing VCUPs for smaller parcels to carve out the impacted portions of the larger property. VCUPs and risk assessments were prepared for parcels separately as buyers were identified and went under contract. No-Action Determinations were issued for the individual parcels as the property was fully developed.

2. Former Service Station - Northglenn, Colorado
Paragon completed a soil and groundwater characterization; identified volatile organic compound (VOC) and petroleum contamination in groundwater from a used-oil tank; prepared database and historical reviews; coordinated with the CDPHE; performed a risk assessment; and finalized and submitted a VCUP report. A No-Action Determination was obtained from the CDPHE based on the risk assessment presented in the VCUP Application.

3. Former Car Dealership – Golden, Colorado
VOC contamination in groundwater associated with a used-oil tank was discovered during routine drilling activities. Paragon completed a soil and groundwater characterization, performed quarterly monitoring, completed database and historical reviews, coordinated with the CDPHE, performed a risk assessment, and finalized and submitted a RCRA SCAP report and quarterly monitoring reports. No-Further-Action Status was obtained from the CDPHE based on sampling results, natural attenuation and a risk assessment.

4. Dry Cleaner – Denver, Colorado
Paragon completed a soil and groundwater characterization; performed quarterly monitoring, completed database and historical reviews, and reviewed prior technical reports. Paragon performed a risk assessment, negotiated with the CDPHE regarding natural attenuation as an alternative to active soil and groundwater remediation, and submitted a VCUP report. No-

Action-Determination Status from the CDPHE was obtained based on sampling results and the risk assessment presented in the VCUP Application.

5. Private School – Denver, Colorado

Paragon replaced the previous consultant and coordinated with Colorado Division of Oil and Public Safety (OPS). Paragon performed on-site and off-site subsurface assessment and installed monitoring and remediation wells, performed a geophysical assessment, and prepared the Corrective Action Plan. The remediation treatment train included enhanced-fluid recovery (EFR); oxygen enhancement with microbubblers; and carbon injection. Paragon performed quarterly groundwater monitoring and reporting and performed risk-based fate & transport modeling for groundwater to develop Risk-Based Site-Specific Target Levels (SSTLs) for contaminants of concern. The SSTLs allowed for No-Further-Action issuance for impacted groundwater that remained in place beneath the subject property. OPS issued a No-Further-Action letter for the site based on the SSTLs.

6. Former Service Station - Denver, Colorado

Paragon discovered and reported soil and groundwater petroleum hydrocarbon impacts as part of a property transaction assessment. Paragon coordinated with the OPS and performed on-site and off-site soil and groundwater assessment. Paragon performed remediation bio-feasibility assessment and prepared the Corrective Action Plan. The remediation treatment train included Oxygen Release Compound®, Micro-Blaze® and carbon injections. Paragon performed quarterly groundwater monitoring and reporting and performed risk-based fate and transport modeling for groundwater to develop Risk-Based Site-Specific Target Levels (SSTLs) for contaminants of concern. These SSTLs allowed for No-Further Action issuance for impacted groundwater that remained in place beneath adjacent public roadways and beneath off-site properties. OPS issued a No-Further-Action letter for the site based on the SSTLs.