

JENNER & BLOCK LLP/GENERAL DYNAMICS CORPORATION
Tucson, Arizona

Strategic Environmental Management and Litigation Support Services, CERCLA Site, Tucson International Airport

Geolex, Inc. (Geolex) has been providing strategic environmental management services to General Dynamic Corporation initially through McKenna & Cuneo LLP and, subsequently, Jenner & Block LLP since 1991. Our activity on this project was initiated as a litigation support function in response to seven separate toxic tort actions taken against a group of PRPs on the Tucson International Airport (TIA) and U.S. Air Force Plant 44 (Plant 44) CERCLA sites in Tucson, Arizona.

There are two CERCLA sites with multiple operable units that comprise the overall Superfund Site in the vicinity of TIA. The major PRPs in these sites include the United States Air Force, Raytheon, Hughes, Boeing, General Dynamics, the City of Tucson, Tucson Airport Authority, the Arizona Air National Guard, Hamilton Aviation, Burr Brown, and several smaller companies. The CERCLA site consists of contaminated soil and groundwater on the Plant 44 site, which has migrated into a drinking water aquifer for the City of Tucson and beneath TIA. In addition, historic activities at TIA Three Hangars Area were involved in toxic torts and property damage actions related to the contamination of the drinking water aquifer. Subsequent to the trying and settling of these private actions, the PRPs entered into negotiations with each other and EPA to arrive at a consent decree for the remediation of the various operable units at the site. Alberto A. Gutiérrez, R.G., as President of Geolex, has served as General Dynamics' technical representative to the settling defendants' committee and to the technical committee overseeing the implementation of soil and groundwater remedies at the site. Geolex has provided services spanning the spectrum of various environmental, hydrogeologic, regulatory, and litigation support areas on this project.

Currently, Mr. Gutiérrez (Arizona Registered Professional Geologist) is on the technical committee overseeing the development and implementation of the remedial design for the contaminated soil and groundwater on the TIA property associated with the Three Hangars area. Their effort included two-year prolonged negotiations with EPA, arriving at a consent decree that permits the remediation of contaminated soil and groundwater in the area and establishes a technical impracticability zone for an area where contamination concentrations and aquifer characteristics make it extremely difficult, if not impossible, to remediate with current technologies.

Our services have also included value engineering, evaluations, and overall development and implementation of environmental, regulatory, and engineering strategies to minimize the capital and long-term operation and maintenance costs associated with the remedial action, which is anticipated to take approximately 25-30 years from startup in 2006-2007. This project is an excellent example of the integration of multi-disciplinary support through representation by a strong technical and regulatory expert on behalf of our clients to minimize total costs on a project and to assure technical excellence and regulatory compliance.

Major Project Elements:

- Hydrogeology
- Historical aerial photographic analysis
- Litigation support
- Chemical fingerprinting
- Groundwater modeling
- Remedial design
- CERCLA compliance
- Sampling and analysis plan development/ Optimization
- Design and construction oversight
- RI/FS & RD/RA oversight activities
- Regulatory negotiations
- Management & cost control
- Chlorinated solvent geochemistry
- 1,4 dioxane

