

# Ending the Investigation: “We’re not the Cause of the Pollution”

Environmental Advisors

A Client Success Story

**Routinely, companies come to Dragun when another consultant has failed them.** In the following example, a company that distributes gasoline (Client) had a release at one of their locations that resulted in significant soil and groundwater remediation.

## Initial Investigation

The Client hired an environmental consultant who removed two underground storage tanks and more than 1,100 metric tonnes of impacted soil. Sixty soil borings and monitoring wells later, they began chemical injection treatments to remediate the groundwater.

Years after the consultant began the work, there were still major groundwater contamination issues. The Regulator was not pleased with the progress and requested more investigation. Among the requests from the Regulator was to further delineate the extent of impacted soil and groundwater, investigate reported gasoline vapors, and report on the progress of the cleanup to background levels.

The (now thoroughly frustrated) Client asked Dragun to peer review the file. Could we find an efficient way to end the project?

## Dragun’s Compelling Evidence

After our **peer review** and limited additional investigation, we **convinced the Regulator** that our

Client should be “done” at this site. Here’s the evidence we presented to the regulators:

# EVIDENCE



1. We knew exactly where and when our Client’s release occurred, and the groundwater chemistry clearly indicated a second, older release of gasoline on our Client’s property.
2. The soil chemistry data indicated the second release occurred when the groundwater was at a different elevation than when our Client had their release.
3. High-resolution groundwater monitoring from data loggers revealed a very complex and dynamic groundwater flow map. First, we identified a groundwater divide on the site. The divide indicated the second, older release originated off site. Second, the groundwater rarely flowed in what would be considered the “likely” direction, but instead the groundwater flow was affected by the city sewer.
4. The previous review of site history was poorly executed. There was an old gasoline tank below a building adjacent to our client’s property, not several blocks away, as reported in the site history.
5. A soil gas survey showed that gasoline vapors in the city sewer pump station should no longer be an issue.



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The impacted groundwater on the west side of the site was not our Client’s responsibility as previously thought by the Regulator; it was due to an old release from the adjacent property.

The reevaluation of the historical site conditions uncovered this previously-unidentified source. The Regulator released our Client from further delineation and remediation of that problem.

What we presented to the Regulator was a new interpretation of the site conditions based on multiple lines of data.

Dragun **clearly demonstrated** that our Client was not responsible for the soil and groundwater contamination on the west side of their property. And in the end, we provided the compelling evidence that convinced the Regulators of our argument and **saved our client hundreds-of-thousands of dollars.**

## Testimonials:

“Data-driven forensics work is becoming more important in this sector and Dragun is foremost in identifying opportunities for analysis and conducting such work.” (Lawyer)

“In our experience, Dragun's work has been more accurate, and more complete, than the work of other environmental consultants because Dragun takes the time to get to the facts.” (Corporate EHS Manager)

“I find it refreshing to deal with people who are really engaged with critical analysis.” (Lawyer)



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