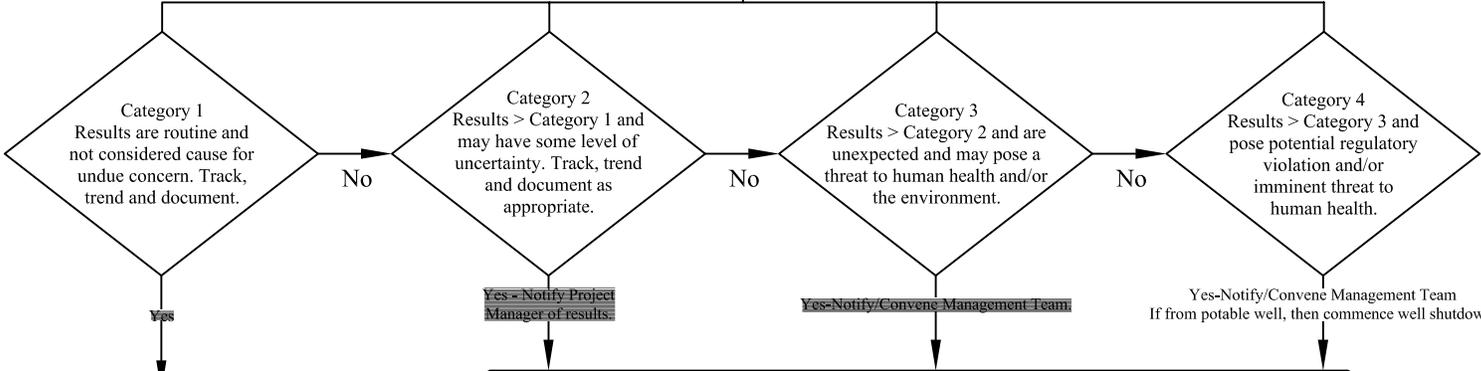


BNL GROUNDWATER CONTINGENCY PLAN

- Provides guidance on responding to the detection of unexpected levels of contamination in BNL groundwater monitoring and water supply wells.
- Actions are organized into four stages: Discovery, Confirmation, Near-term Follow-up and Reporting, and Long-term Follow-up

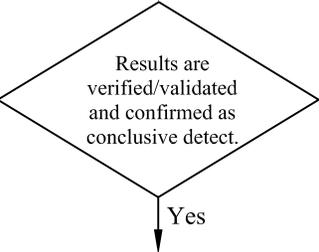
Stage I - Discovery : BNL reviews new groundwater monitoring results for all CERCLA and Facility monitoring wells and potable supply wells. Results are categorized according to specified "Action Levels" .



Plan implementation stops.

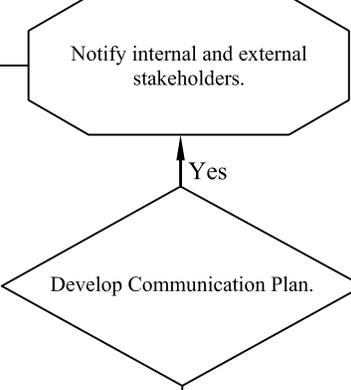
Stage II - Confirmation : New samples are collected from the affected well, and nearby wells if appropriate. Samples are delivered to lab(s) for quick turn-around analysis. A review of all existing and historical data is performed of affected and vicinity wells. Form technical team to evaluate source of contamination. Regulatory agencies could be notified of initial unconfirmed results (Cat 3 & 4 only).

Results are verified/validated and determined to be Non-Detect for all confirmatory samples. Plan implementation stops.



- Notification of confirmation to Regulators
- BNL Technical Team meets to assess
- Draft fact sheet prepared
- BNL Management Team meets to assess (Cat 3 & 4)
- Determine if release is Off-Normal or Unusual Occurrence (comply with ORPS)
- Proceed to Stage III - Near-Term Follow-up

Stage III - Near-term Follow-up & Reporting: Collect additional samples, if necessary. Initiate intensive sampling of all potentially impacted wells. Utilize modeling or other methods to evaluate any impacts to receptor wells. Finalize fact sheet, determine if communication plan is needed. Prepare written Occurrence Report (if necessary).



Stage IV - Long-term Follow-up & Reporting: Evaluate the analytical results from Stage III and make recommendations as appropriate. Ensure full compliance with all required reporting and corrective actions. Develop plan to investigate source(s). Determine applicability of the IAG (identification of new AOCs). Determine what corrective actions/follow-up activities are needed.