

Attachment 2: Decision Matrix

Rule 603 Criteria for Evaluation of Remedial Alternatives	Comments	Favors PLS Plan	Favors DEQ Alternative
The effectiveness of protecting the public health, safety, and welfare and the environment	Both remedies are equally protective.	--	--
Long-term uncertainties associated with proposed remedial action	For PLS plan, uncertainty is with projected pathway and fate of plume; for DEQ uncertainty is NPDES permit conditions and feasibility of treatment at MVSC and of construction of pipelines	--	--
The toxicity, mobility, and propensity to bio-accumulate of the hazardous substance	Not evaluated. Same for both.	--	--
The short and long-term potential for adverse health effects from human exposure	There are no current exposures. Both plans prevent future exposures	--	--
The costs of the remedial action, including long-term maintenance	DEQ did not balance the costs, although it did review the estimates. PLS estimates its plan will be much less costly.	Yes	No
The reliability of alternatives	Both rely on “pump and treat.”	--	--
The potential threat to public health, safety and welfare and the environment associated with the excavation, transportation, and re-disposal or containment	PLS’s plan is low (re injection into aquifer). DEQ’s alternative considerably higher (large scale treatment, oxygen storage, materials transportation, construction and operation of pipelines)	Yes	No
The ability to monitor remedial performance	Both require extensive monitoring	--	--
The reliability of the alternatives	Large scale system proposed by DEQ is more prone to long term operation and maintenance problems; no way to directly verify internal “capture” requirement. PLS has proposed reinjection, which is well established technology.	Yes	No
The public’s perspective about the extent to which the proposed remedial action effectively addresses Part 201 and the Part 201 Rules.	Public comments went both ways. However, residents at the leading edge and the City of Ann Arbor do not favor “leading edge” capture.	--	--
The potential for future remediation if the alternative fails	Same for both.	--	--