



PROFESSIONAL PROFILE



George A. Tyers, PG

Principal Hydrogeologist

CONTACT INFORMATION

Main: (631) 232-2600
Direct: (631) 630-2386
Email: gtyers@rouxinc.com
Website: www.rouxinc.com

209 Shafter Street
Islandia, NY 11749

EDUCATION

MS, Earth and Space Sciences
(Hydrogeology
Concentration), State
University of New York at
Stony Brook, 1999
BS, Geology, Southampton
College, LIU, 1983

PROFESSIONAL LICENSES

Professional Geologist,
New York State #000418
Certified Professional Geologist,
AIPG. No. 10274

EXPERIENCE SUMMARY

Thirty-five years of professional geological and environmental consulting experience including soil and groundwater investigations and remediation, environmental site assessments, airborne geophysics for oil and gas prospecting, asbestos inspections and abatement monitoring, and insurance claim evaluation.

Since January 2004, Mr. Tyers has focused on providing pollution claim evaluations for insurance carriers for sites located across the United States and internationally. Mr. Tyers has evaluated hundreds of claims including leaking underground storage tank sites, pipeline releases, dry cleaners, and oil and gas sites. Mr. Tyers has also been retained as an expert in cases related to petroleum and chlorinated solvent contamination.

TECHNICAL SPECIALTIES

Soil and groundwater contaminant investigation and remediation. Environmental insurance claim evaluations including source identification, cost evaluations, timing evaluations, damage assessments, cost estimates, and litigation support.

REPRESENTATIVE PROJECTS

Representative Cases

- Bill Wolf Petroleum Corp. v. Laretco Company, Inc., Larry E. Tyree Co., Inc., et al; Supreme Court of the State of New York, County of Nassau; Index No. 15168/11.
- Allstate Insurance Company v. Marusia Cuellar. Superior Court of New Jersey Chancery Division: Hudson County. Docket No. HUD C-51-10.
- Long Island Lighting Company d/b/a LIPA v. H2M Group, et al. Nassau County, NY. 2008.
- Spotswood-Loman v. Ramal Inc. v. Hartford Insurance Company, et al. New Jersey.
- R. L. Vallee, Inc. v. American International Specialty Lines Insurance Company. United States District Court, Vermont 2006.
- Charles F. Wasserman, L.C.S. Investments LLP and Severn and Veterans LLC v. Dolores Craven and Gloria Watson. Louisiana.
- Georgetown Plaza, LP. v. Benzo, Inc., et al. Marion Supreme Court Indiana.
- Miami River Project, LLC v. Groundwater Environmental Group, Inc., et al. 2016.

Insurance Claims and Litigation Support

- Consulting expert for insurance claim adjusters for hundreds of environmental claims nationwide including underground storage tank releases, heating oil claims, pipeline releases, oil and gas sites, saltwater disposal sites, dry cleaner sites, and contaminated commercial and industrial facilities.
- Provided technical and remediation cost evaluations for insurance carriers in connection with pollution claims nationwide and internationally. Provided opinions regarding source and timing of contamination and generated estimates of reasonable past and future costs.
- Provided assistance to insurance adjusters in liability determination, hiring of remediation contractors, source and timing evaluations, and providing opinions regarding timing of releases.

- Expert witness retained to evaluate contribution of secondary contamination resulting from leaking storage tank system at a gasoline service station in Brooklyn, New York, and to evaluate past and projected remediation costs. Provided on-going settlement support to counsel and presented technical arguments at mediation conference.
- Consulting expert for defense counsel to evaluate source and timing of contamination, evaluate the reasonableness of past and projected remediation costs; provide independent estimate of future remediation costs; and assess potential liability of dry cleaner operation in Indianapolis, Indiana.
- Consulting expert for defense counsel to evaluate source and timing of contamination, provide estimate of future remediation costs; and assess potential liability of former dry cleaner operator in Louisiana.
- Technical consulting expert for coverage claim relating to environmental damages arising from the operations of a dry cleaner operation in eastern Pennsylvania. Evaluated existing data to determine the source and timing of contamination. Coordinated and oversaw the implementation of forensic soil and groundwater sampling and analysis plan to assess timing of contamination.
- Technical consulting expert for coverage claim relating to environmental damages arising from gasoline station operations in Westchester County, New York. Evaluated existing data to determine the source and timing of contamination. Coordinated and oversaw the implementation of forensic soil and groundwater investigation to assess timing of contamination.
- Provided litigation support to evaluate past and future costs at several Midwest US paint manufacturing facilities.
- Provided claims evaluation at dozens of underground storage tank sites throughout the United States, particularly in New Jersey, Florida, Michigan, and Texas.
- Consulting witness for major insurance company to evaluate source and timing of petroleum release at a retail petroleum service station in a complex limestone geologic setting in Vermont.
- Provided expert consultant services to insurance carriers in connection with coverage disputes related to contamination resulting from oil and gas operations in several states.
- Provided on-going project support for claims adjusters including providing opinion regarding reasonable and necessary work, proposed cost and invoice reviews, assessment of past and future cost allocations.
- Analysis of costs related to improperly designed landfill in Minnesota. Determined damages arising out of implementation of flawed engineering design.
- Evaluated site data and conducted source and timing evaluation of petroleum contamination at gasoline service station in Wheeling, West Virginia.
- Evaluated current and historical site data to assess contribution of recent pipeline release to pre-existing petroleum contamination at a gasoline service station in Passaic County, New Jersey.
- Retained as expert and testified in court regarding asbestos abatement costs in tax certiorari case in Nassau County, New York.
- Claim evaluation and forensic study to determine the timing of contamination at a gasoline service station in Westchester County, New York. Non-aqueous phase liquid (NAPL) samples were extracted from absorbent pads and submitted to lab for fingerprint and forensic analysis including tetraethyl lead and “PIANO” petroleum hydrocarbons. Based on the lab analysis Mr. Tyers provided a source and timing opinion, and coverage was disclaimed.
- Technical consulting expert for a claim relating to environmental damages arising from a fire and subsequent offsite migration of contaminants at a fertilizer plant in Pennsylvania. Mr. Tyers was responsible for categorizing and evaluating the reasonableness of past costs.
- Provided insurance claim support and evaluation related to saltwater contamination of drinking water well in northern Oklahoma. The drilling contractor (the insured) employed to install geothermal wells encountered a saltwater aquifer while drilling which resulted in the vertical migration of saline water into overlying drinking water aquifer. Mr. Tyers obtained local contractor to flush well and provide temporary supply of potable water. After evaluation of technical alternatives and costs, a point-of-entry water treatment system utilizing reverse osmosis filtration was installed at claimant’s residence and Mr. Tyers negotiated settlement agreement with claimant.
- Provided insurance claim support and damage assessment from saltwater contamination (road salt) at Long Island, New York golf course.
- Providing on-going technical support to insurance carriers for dry cleaner remediation projects in the State of Indiana. Responsibilities include review of work scopes, analytical data, project reports and deliverables to the Indiana Department of Environmental Management, cost proposals, invoice reviews, budget tracking, and technical consulting.

Site Investigation and Remediation

- Conducted numerous Phase I Environmental Site Assessments in accordance with ASTM Standards.
- Principal Hydrogeologist for the investigation and remediation of a gasoline spill site in complex bedrock setting at a former bus garage and gas station in New Jersey. Contaminants included petroleum hydrocarbons and the gasoline additives MTBE and TBA. Pneumatic fracturing and hydraulic injection of sand slurry was conducted to increase permeability of contaminated formation. Remediation of the site was performed using bioremediation technology via closed loop groundwater re-circulation system.
- Principal-in-Charge for investigation and remediation of former gas station in Smithtown, NY. Responsibilities included evaluating historical analytical data, assessing the need for additional investigation, prepared and implemented subsurface investigation work plan to characterize the nature and extent of contamination including the advancement of soil borings, collection and analysis of soil samples, preparation of geologic cross-sections, and reporting. A quarterly groundwater monitoring program was implemented, and Mr. Tyers was responsible for collection and analysis of groundwater samples, preparation of groundwater flow maps, iso-concentration maps, and monitoring reports. A remedial action plan was prepared, and the Site remediated by in-situ enhanced bioremediation (via chemical injection) and soil vapor extraction (SVE). Mr. Tyers prepared an exposure assessment that provided the basis for regulatory site closure that was approved by the NYSDEC.
- Strategic consulting for major petroleum company. Evaluated existing remedial action work plans and remediation activities conducted at gas station sites nationwide with complex and challenging technical and legal issues that prevented site closure including complex bedrock settings, low permeability clays, and multiple contaminants. Alternative remedial options were assessed, and cost estimates prepared that were specifically designed to overcome the challenges at each site and achieve closure.
- Principal-in-Charge for the evaluation of claim stemming from the release of gasoline caused by drilling contractor's accidental damage to product pipeline at a gasoline station in western Mojave Desert in California. A deep groundwater investigation (150 feet bgs) was completed and a soil vapor extraction system installed and operated.
- Principal Hydrogeologist for the investigation and remediation of a residential fuel oil release in eastern Pennsylvania. The release occurred in the basement of a house and fuel oil entered a sump that discharged to a field several hundred feet from the house. The release resulted in contamination to soils and rock below the basement, at the discharge location, and at several locations along the discharge pipe. Mr. Tyers oversaw the investigation to determine the extent of contamination, evaluate cleanup options, and implementation of the remedial actions.
- Project Manager for UST removal project and subsequent remedial investigation at Paterson, New Jersey site. The project included the removal of one 4,000-gallon UST and a dispenser pump. Following the discovery of a petroleum release, remedial action and remedial investigation activities were implemented that consisted of removing additional impacted soil, soil sampling, monitoring well installation and groundwater sampling.
- Project Manager for natural attenuation remediation project at a petroleum-contaminated bus maintenance facility in New Jersey. Upon NJDEP approval of remedial action plan, a natural attenuation monitoring program was implemented consisting of semiannual sampling and reporting. Additionally, the leading edge of the plume was treated with an oxygen-releasing compound (ORC) under a NJDEP Permit-by-Rule.
- Performed Phase II Environmental Assessment at a former commercial liquid/sludge waste processing center in Jersey City, New Jersey. The project objective was to characterize the environmental site conditions by collecting soil and groundwater samples in specific areas of concern related to the former site activities. Twenty-two soil borings were completed for soil sampling and groundwater samples were collected from existing monitoring wells and from temporary well points installed with a Geoprobe. The data that was collected was used to develop a budgetary remedial cost estimate.
- Project Manager of approximately 50 sites for two major retail petroleum companies throughout Long Island and New York City. Responsibilities included: design and management of on-site and off-site soil and groundwater investigations; feasibility and pilot testing of selected remedial technologies; installation and start-up of SVE/sparge systems; management of underground storage tank USEPA compliance upgrade/removal assessments; preparation of assessment reports and remedial action work plans to satisfy NYSDEC stipulation agreement requirements, monthly remedial system operations and maintenance management, and quarterly ground water monitoring management and reporting.
- Performed subsurface soil investigations at various railroad facilities to determine soil quality prior to planned construction activities.
- Project Manager for numerous U.S. Environmental Protection Agency (USEPA) Underground Injection Control (UIC) Program Sites. Performed initial inspections and prepared UIC remedial

work plans to comply with USEPA closure requirements. Oversaw remedial actions, including groundwater and soil remediation, and achieved closure.

- Senior Hydrogeologist for New York State Class 2 Inactive Hazardous Waste Site at dry cleaning facility on Long Island. Prepared remedial investigation and remedial measures work plans, reports, and managed field activities. Field activities included: test pits; soil borings; well installation; soil and ground water sample collection and analysis, and removal of impacted soil. Assisted in design of soil vapor extraction system and coordinated installation, start-up, and management of system through closure.
- Project Manager for Phase I, II and remedial actions at several large shopping centers on Long Island for a large real estate developer. Investigations included soil and groundwater investigations, UST/soil removals, and asbestos inspections and abatement.
- Performed investigations at operating and abandoned commercial properties throughout Long Island and New York City. Investigations included UST removals, subsurface soil and groundwater investigations, and geophysical surveys.
- Managed investigation to determine lateral and vertical extent of chlorinated solvents in groundwater at a Long Island dry cleaning facility. The scope of work included vertical profiling of ground-water quality including both onsite and off-site analysis

of ground water samples continued until the contaminant plume was delineated.

PROFESSIONAL TRAININGS

40-Hour OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) Certified

NGWA Training Course; Natural Attenuation of Contaminated Sites, March 1998.

NGWA Training Course; Environmental Forensics; Methods and Applications, June 2006.

Rutgers Office of Continuing Education: Groundwater in Fractured Bedrock, April 2010.

Rutgers Office of Continuing Education: Site Remediation Reform Act & LSRP Program, March 2010.

Rutgers Office of Continuing Education: Environmental Forensics: Methods for Age-dating Contamination, October 2010.

Rutgers Office of Continuing Education: Advanced Petroleum Forensics, October 2012.

PROFESSIONAL AFFILIATIONS

American Institute of Professional Geologists (AIPG)

New York State Council of Professional Geologists

National Groundwater Association (NGWA)

Society of Environmental Insurance Professionals