

## Jakub, Barbara, Env. Health

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**From:** Mehrdad Javaher [mehrdad@lrm-consulting.com]  
**Sent:** Wednesday, December 14, 2011 4:13 PM  
**To:** Jakub, Barbara, Env. Health  
**Subject:** Re: RO 0134-Former Val Strough Chevrolet-Draft CAP Addendum  
**Attachments:** scan0004.pdf

Hi Barb-

Thanks for calling me today to clarify the items you had questions about.

I've attached a hand-marked copy of the basemap which shows the source area and related wells. The key features shown are:

- 1) a Wall (hand-mark label "wall" )which separates the service area from the parts department. This wall is very close to MW-3 and limits access around this well in the downgradient direction.
- 2) a chain fence which encompasses MW-3 is hand marked, which further limits rig access to the location of this well. We can get a limited access rig in for injections, but it is very difficult. The fence is there (and usually locked) so people can go from service area to the parts department.
- 3) The parts department as shown as a series of row of shelves on which parts and equipment are stored within the parts department. Access to even monitor MW-4 is very difficult, let alone getting a rig into the parts department to advance any wells; I don't know how that well was ever installed historically. As you know, MW-4 has been clean throughout the record of history.

Lastly, please consider the scale of the map and the fact that all of these wells are in very close proximity to one another. MW-3 and MW-9a/9b are about 7 feet apart. I don't think we can even get another well in next to MW-3 (or between MW-3 and 9a/9b, given access issues and the many utility lines that cross that area. We had to be very careful when injecting around that area (we got one injection point in within a couple of feet of MW-3 the during the pilot test).

Please let me know if you want photos to help support this. We can swing by the site to take some. There were no historical basemaps showing any more detail than we've provided.

Please let me know if you want to discuss this further or have any additional questions or needs.

Thanks again for your help.

Regards,  
Mehrdad

On 12/12/2011 2:49 PM, Jakub, Barbara, Env. Health wrote:  
No but it is next on my list. Hope to get the letter out to you this week if all goes well.

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**From:** Mehrdad Javaher [<mailto:mehrdad@lrm-consulting.com>]  
**Sent:** Monday, December 12, 2011 2:36 PM

To: Jakub, Barbara, Env. Health

Subject: Re: RO 0134-Former Val Strough Chevrolet-Draft CAP Addendum

Hi Barb-

Sorry to bug you on this, but was wondering if you've yet had a chance to review the very brief (2 pages) DRAFT CAP Addendum and the email below in support of finalizing the Draft CAP for public review?

I know you're busy, so thank you in advance for your time.

Regards,  
Mehrddad  
415-706-8935

On 11/21/2011 2:12 PM, Mehrddad Javaher wrote:

Hi Barb-

Thanks again for your time last Friday, November 18, 2011 to discuss your comments on the DRAFT CAP for the former Val Strough Chevrolet Site. First, per your request, we have uploaded to Geotracker the EDF and Geo-Well reports for the 4th Quarter 2010 and the first three quarterly monitoring events in 2011. We have also uploaded the Draft CAP to Geotracker; proofs of each of these uploads are attached herein.

Second, in response to your request during our call last week, we have prepared a brief, 2-page Draft CAP Addendum letter report which includes a table summarizing a cost comparison between the remedial alternatives evaluated, and a map showing the proposed location of the DPE system compound; this Draft CAP Addendum has been uploaded to your ftp site and to Geotracker.

As we discussed on Friday, please take a few minutes to review the Preferred Remedial Alternative section (Section 5.2) and the Implementation Plan section (Section 6) of the Draft CAP previously submitted.. These two sections clearly outline our proposed plan to first apply DPE for at least 6 months to remove free product (SPHs) from the residual source area. Only after the SPHs have been removed, we would then apply the ISCO (RegenOx) injection to target the dissolved plume without the free product source feeding it.

As discussed, we see a lot of benefit (cost and efficiency) for having an overarching CAP that approves both alternatives (one alternative for free product and one alternative for dissolved plume) to be implemented in a tiered approach, rather than approving only one alternative and then having to prepare another CAP for the second alternative. To allow for such approval, the implementation plan in the Draft CAP outlines clearly the trigger points for transitioning between DPE and ISCO, including the fact that ISCO will only be applied after the SPHs are shown to have been removed through demonstrated absence via post-DPE monitoring. The implementation plan also outlines the reporting of this information to the County and obtaining concurrence before DPE is terminated after SPH removal and transition to ISCO for dealing with the dissolved phase occurs.

If you have any remaining questions, I would greatly appreciate the opportunity to discuss this with you to help streamline the Draft CAP review process and allowing for initiation of the public review process. As you indicated during our call, our aim is to initiate the permitting process in December pending your review of the brief Draft CAP addendum and review of the sections of the original Draft CAP referenced above.

Thanks as always for your help and support.

Regards,

Mehrdad

Mehrdad Javaherian  
LRM Consulting, Inc.  
415-706-8935

