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**Attachments:** Cap\_Mod-3333Final.pdf  
Generic Cap.pdf

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Heather

I think that this revision captures what we discussed with you, Mike and Brad about 2 weeks ago. The "Generic CAP" provides background data and will be submitted with all CAPs forthcoming.

Shelly – the only difference between this surface remedy and those approved by BLM with eTech is

1. We use precipitation and storm water diverted to the spill footprint to flush the salt below the root zone
2. We do not use any additives – other than some hay to increase the permeability of the soil
3. We provide as-built drawings of the remedy – with relative elevations of berms, overflows, diversion channels, etc.
4. We take a second set of samples after 12 months **or** when volunteer vegetation is present
5. Seeding occurs after we observe the volunteer vegetation or sampling shows the soil is good for seeding.

Note the closure criteria does not rely upon chemistry – it is closed when the site is re-vegetated.

Let us know what you think.

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