Sonoma County Community Development Commission
Sonoma County Housing Authority
1440 Guerneville Road, Santa Rosa, CA 95403-4107

EXHIBIT A

SCOPE OF WORK

BACKGROUND

The Project was a dry cleaning facility located at 761 Sebastopol Road, Santa Rosa, California (the Site). Dry cleaning operations were conducted at the Site between 1965 and 1971. This Site is bounded by a drainage ditch and commercial property to the north; commercial and retail properties adjacent to the east; commercial and retail south across Sebastopol Road; and commercial and retail properties adjacent to the west. The Site is owned by Sonoma County Community Development Commission (the SCCDC). The SCCDC intends to have the Site redeveloped under a public-private development with two high-density residential housing buildings, including affordable housing, (referred to herein as Buildings A and B), a civic building, a market, and a one-acre public plaza.

A release of tetrachloroethene (PCE) from the former dry cleaning facility was discovered in January 2002 during a sanitary sewer assessment and underground utility survey. During the assessment, PCE was detected in a groundwater sample up to 288 parts per billion. In November 2002, the California Regional Water Quality Control Board – North Coast Region (Regional Water Board) issued a California Water Code Section 13267 Order regarding the former dry cleaners at 761 Sebastopol Road in response to the detection of PCE and other contaminants in groundwater during the assessment. The Regional Water Board required that an investigation be conducted to determine the source of PCE in groundwater and define the complete lateral and vertical extent of contamination.

Soil, soil gas, indoor air, and groundwater investigations and soil removal actions have been conducted at the Site since 2003. Confirmation soil sample results indicate that the PCE-impacted soil has been excavated from the Site. On 29 December 2016, the Regional Water Board issued a Path Forward to Redevelopment Letter. The letter concluded that the residual concentrations of PCE in shallow soils near the former dry cleaner do not present a direct contact risk to human health and the Regional Water Board requires no further action with respect to PCE in soil. In the letter, the Regional Water Board required an additional investigation of soil vapor and groundwater to better delineate impacts in those media, continuation of groundwater monitoring, preparation of a Conceptual Site Model, and development of an environmental site assessment and response plan.

Additional investigations were conducted at the Site in 2017 by Harris and Lee Environmental Services (HLENV), and results, along with a Conceptual Site Model, were submitted to the Regional Water Board by HLENV under report entitled *Site Assessment Report and Conceptual Site Model*, dated 31 October 2017. The report concluded that the lateral and vertical extent of PCE in the soil vapor and groundwater has been delineated and that groundwater monitoring indicates that the PCE groundwater plume is stable and decreasing in concentration in the

vicinity of the former dry cleaner. In a letter dated 19 January 2018, the Regional Water Board concurred with the conclusions presented in the report. The Regional Water Board also indicated that an environmental response plan would need to be prepared to: (1) develop appropriate cleanup levels protective of human health and the environment; and (2) select a cleanup method to meet these levels in a reasonable time frame. The Regional Water Board also required that the response plan include a method for control and mitigation of potential soil vapor intrusion into future residential units within the footprint of the PCE plume, and a Site Management Plan to manage soil and groundwater generated during development.

In 2018, several remedial technologies were evaluated for the reduction of PCE in the groundwater and soil vapor at the Site. It was determined that the most effective response action for reducing the PCE mass in groundwater would be in-situ chemical oxidation (ISCO) technology. Reduction of PCE mass in groundwater will result in a reduction of PCE mass in soil vapor. To help design the final groundwater response action, an ISCO Pilot Test will be conducted. Based on the results of the Pilot Test, the full scale response actions will be designed and implemented.

If the groundwater remedy is not effective at the time of Site development in reducing the concentration of PCE in soil vapor to below concentrations that pose an unacceptable vapor intrusion risk to future ground-floor residential occupants in Building A, a vapor barrier and Passive Vapor Intrusion Mitigation System (PVIMS) will be required to be installed. This PVIMS is included in the response plan as a contingent remedy. The scope and estimated cost for this contingent remedy are included herein.

This response action Scope of Work includes the following:

- Implementation of the ISCO Pilot Test in the former dry cleaner area and evaluation of the results. Additional mass delineation in the former dry cleaner area, installation of groundwater and soil vapor monitoring wells, laboratory bench-scale permanganate testing, and aquifer testing will be conducted as part of the Pilot Test;
- Preparation of the final response action for PCE-affected groundwater;
- Implementation of the final response actions, including soil gas sampling to evaluate the need for the contingent remedy;
- Design/installation of a contingent PVIMS beneath a portion of Building A; and
- Two years of post-Pilot Test groundwater and soil vapor monitoring to confirm the effectiveness of the remedy.

WORK TO BE PERFORMED BY GRANTEE

ISCO Pilot Test

The objective of the ISCO Pilot Test will be to inform the final response design criteria for the PCE-affected shallow and upper deep groundwater and assess the effect of the reduction of PCE concentrations in shallow groundwater on the PCE concentrations in soil vapor. The first task of the Pilot Test will be to conduct additional mass delineation in the former dry cleaner area to

further define the lithology in the Pilot Test area and to better delineate the PCE distribution in the subsurface in the former dry cleaner area. The second task will be to install additional groundwater and soil vapor monitoring wells. Groundwater and soil vapor will be sampled from the new and existing wells to establish baseline conditions prior to the ISCO injections. These wells will also be used to assess the performance of the Pilot Test injections and for longer term groundwater and soil vapor monitoring. The third task will be to conduct an aquifer test to evaluate the hydrogeologic properties of the shallow and upper water bearing zones. The fourth task will be to conduct laboratory bench-scale testing of permanganate reactions with PCE in the Site groundwater samples in an effort to inform the design of the injectate formula. Following completion of these tasks, the ISCO injections will be conducted in a small target area of the former dry cleaner area.

To accomplish the above objectives, the following specific scope of work will be conducted:

- Task 1: ISCO Pilot Test Work Plan:
  - A work plan for the scope of work to be conducted for the ISCO Pilot Test will be submitted to the Regional Water Board and State Water Resources Control Board via GeoTracker for review;
  - As necessary, comments to the work plan will be addressed; and
  - Upon receipt of concurrence of the work plan, the scope of work will be initiated.
- Task 2: Pre-Injection Delineation in Former Dry Cleaner Area/Well Installation:
  - All necessary pre-field activities to implement the additional investigation, including securing all subcontractors, permits, access agreements, notifications, and staging areas, preparing a health and safety plan, arranging utilities clearances, and notifying regulatory agency of the dates of activities at the Site will be performed;
  - Advance cone penetration test (CPT)/dynamic penetration test (DPT) borings will be performed to collect lithologic data and to collect soil and grab groundwater samples in the former dry cleaner area;
  - A total of one soil and four grab groundwater samples from each boring will be analyzed by an offsite contract laboratory for volatile organic compounds (VOCs) analysis. This data will be used to assess the lateral and vertical distribution of PCE in the Pilot Test area. Each boring will be grouted to the surface following sample collection;
  - Four shallow zone groundwater monitoring wells will be installed to a total depth of 25 feet below ground surface (bgs). Three upper deep zone groundwater monitoring wells will be installed to a total depth of 40 feet bgs. Following installation, the wells will be developed;
  - Five soil vapor wells will be installed to a total depth of 5 feet bgs;
  - The location and elevation of the well heads will be surveyed by the licensed surveyor; and

    - The soil cuttings and development water will be drummed for offsite disposal.
- Task 3: Aquifer Testing and Data Analysis:
    - An aquifer slug test will be conducted at two well pairs;
    - Water levels will be measured during the aquifer slug test using pressure transducers; and
    - The data will be evaluated to assess the hydraulic conductivity of the water bearing zones.
- Task 4: Bench Scale Testing and Baseline Groundwater and Soil Vapor Sampling:
    - Soil and groundwater will be collected during the well installation activities for submittal to the offsite analytical laboratory for an ISCO bench-scale test;
    - Baseline sampling will be conducted at 17 groundwater monitoring wells and 5 soil vapor wells prior to the implementation of the ISCO injections. Soil and soil vapor samples will be analyzed for VOCs. Groundwater samples will be analyzed for VOCs and the following dissolved metals: barium, chromium, lead, manganese, nickel, and zinc; and
    - The purge water will be drummed for offsite disposal.
- Task 5: ISCO Injection Test Design Report:
    - The data collected during Tasks 1 through 3 will be evaluated and an ISCO Injection Test Design Report will be prepared, which will finalize oxidant selection, oxidant dosing plan, injection location layout, and the oxidant injection plan; and
    - The Final ISCO Injection Test Design Report will be submitted to the regulatory agencies for review via GeoTracker. Upon receipt of regulatory concurrence, the ISCO Injection Test will be conducted.
- Task 6: ISCO Injection Test:
    - A notice of intent (NOI) to apply for the General Waste Discharge Requirements (WDR) for In-Situ Treatment will be prepared;
    - The regulatory agency will be notified of the dates of activities at the Site;
    - Injections of sodium permanganate will be conducted at 14 location from a depth of 12 to 38 feet bgs; and
    - Any waste generated will be drummed for offsite disposal.
- Task 7: Performance Groundwater and Soil Vapor Monitoring:
    - Monthly groundwater and soil vapor monitoring will be performed for a period of four months (total of four events);

- Groundwater samples will be collected from three shallow and two upper deep zone groundwater monitoring wells to assess the performance of the ISCO product on the destruction of the PCE in groundwater;
- The purge water will be drummed for offsite disposal;
- Soil vapor samples will be collected from one soil vapor well located close to the Pilot Test area; and
- Groundwater samples will be analyzed for VOCs and the following dissolved metals: barium, chromium, lead, manganese, nickel, and zinc, and soil vapor samples will be analyzed for VOCs by an offsite analytical laboratory.

- Task 8: ISCO Injection Test Data Evaluation Report:
  - A report will be prepared that presents the results of the ISCO Injection Test. This report will be submitted to the regulatory agencies for review and concurrence via GeoTracker.

Response Plan

The objectives of the Response Plan are to summarize the investigations conducted to date including the ISCO Pilot Test; identify occurrences of constituents of concern (COC) in the subsurface that may create unacceptable human health risks; and present the final response actions to be implemented to address those occurrences of COC in the affected media to reduce such occurrences to concentrations that mitigate human health risks during construction and for subsequent residential Site use.

Following completion of the ISCO Pilot Test, the Response Plan will be prepared for regulatory approval. Upon regulatory approval, the final response actions will be implemented. The following final response actions are anticipated to be identified in the Response Plan: 1) up to two additional ISCO injections, as necessary, to further reduce PCE concentrations in groundwater beneath the Site; 2) monitoring of the groundwater and soil vapor following Pilot Test implementation to verify and document that the response actions are effective at achieving the cleanup goals; and 3) monitoring of the indoor air in the garage portion of Building A, and sub-slab soil vapor will be conducted following construction to verify that the potential health risk to residential occupants has been mitigated.

If, prior to the time of site development, the groundwater remedy is not effective in reducing the elevated concentrations of PCE in the soil vapor to concentrations that do not pose an unreasonable risk to future residential occupants of Building A, the contingent PVIMS remedy will be designed and implemented to mitigate intrusion of PCE-affected soil vapor into residential units located on the ground floor. The results of the soil vapor sampling will be compared to the remedial action goals presented in the Response Plan.

- Task 1: Development of Response Plan:
  - Cleanup levels, methods, procedures, designs, and specifications to be used to implement the response actions will be developed;

- A groundwater remedial plan will be presented to include additional ISCO injections within and downgradient of the release area;
- A design for the contingent PVIMS remedy for the east-west portion of Building A will be described;
- The Plan will include a summary of the Conceptual Site Model;
- A Draft Response Plan will be submitted to the Regional Water Board and State Water Resources Control Board for review;
- Comments received from the Regional Water Board and the State Water Resources Control Board will be responded to, and a Draft Final Response Plan will be submitted;
- A fact sheet that will be reviewed and concurred upon by the Regional Water Board prior to public submittal will be prepared;
- The Draft Final Response Plan and Fact Sheet will be submitted for a 30-day public comment period; and
- Public comments will be addressed and the Final Plan will be submitted to the Regional Water Board and State Water Resources Control Board via GeoTracker.

Implement Response Plan

There are several objectives of the Implementation of the Response Plan. These objectives include:

Groundwater Response: to destroy the PCE in the groundwater via ISCO. This objective will be accomplished by injecting sodium permanganate into the subsurface at several locations at the Site.

Quarterly Groundwater and Soil Vapor Monitoring: will be initiated following the Pilot Test injections to: 1) evaluate the performance of the ISCO in destroying PCE and other chlorinated solvents present in groundwater; 2) assess the overall decline in contaminant concentrations and contaminant plume stability in groundwater; and 3) assess the effect of the reduction of PCE in groundwater on the concentration of PCE in the soil vapor.

Contingent PVIMS Evaluation: to determine whether a PVIMS is necessary for the protection of building occupants based on the monitoring data. The evaluation will be conducted prior to building construction. If the soil vapor monitoring results indicate that PCE concentrations will not be reduced below residential screening levels prior to building construction, then a PVIMS will be designed and installed.

In-Garage Air Monitoring: to evaluate the concentrations of VOCs in the garage space located in the north-south wing of Building A to help confirm that the concentrations are below health risk goals.

The following tasks will be conducted to implement the Response Plan:

- Task 1: Pre-Injection Delineation in Downgradient Area of Site:

- All necessary pre-field activities will be performed to implement the additional investigation, including securing all subcontractors, permits, access agreements, notifications, and staging areas, preparing a health and safety plan, arranging utilities clearances, and notifying the regulatory agency of the dates of activities at the Site;
- CPT/DPT borings will be advanced to collect lithologic data and to collect soil and grab groundwater samples at eight locations in the downgradient area of the Site;
- A total of one soil and four depth-discrete grab groundwater samples from each boring will be analyzed by an offsite contract laboratory for VOC analysis. This data will be used to assess the lateral and vertical distribution of the VOCs in the downgradient area; and
- Each boring will be grouted to the surface.

- Task 2: Groundwater Response (ISCO Injections):
  - The regulatory agency will be notified of the dates of activities at the Site;
  - All equipment and materials, supplies, and personnel will be mobilized to the Site to advance the borings and perform the chemical injections per the design in the approved Response Plan;
  - One round of injections of sodium permanganate will be conducted at 32 locations from a depth of 9 feet bgs to 38 feet bgs;
  - A second round of injections of sodium permanganate will be conducted at 16 locations at a depth of 9 feet bgs to 38 feet bgs;
  - Any waste generated will be drummed for offsite disposal; and
  - Security will be provided for the Site.
- Task 3: Quarterly Groundwater and Soil Vapor Monitoring:
  - Traffic control, equipment, supplies, and personnel necessary to conduct sampling will be secured;
  - Four consecutive quarterly groundwater and soil vapor monitoring events will be conducted, in accordance with the approved Response Plan, for a period of two years;
  - Seventeen groundwater monitoring wells will be gauged, purged, and sampled in each event;
  - Purge water will be drummed for offsite disposal;
  - Five soil vapor monitoring wells will be excavated and sampled in each event;
  - An offsite analytical laboratory will analyze the groundwater samples for VOCs and select dissolved metals (barium, chromium, lead, manganese, nickel, and zinc);

- An offsite analytical laboratory will analyze the vapor samples for VOCs;
- Eight consecutive quarterly groundwater and soil vapor monitoring reports will be prepared;
- Reports will be submitted to the regulatory agencies for review and concurrence via GeoTracker; and
- The contingent PVIMS evaluation will be conducted after one year of monitoring has been completed and prior to building construction.

- Task 4: In-Garage Air Monitoring in Building A:
  - Four consecutive semi-annual garage air monitoring events will be conducted, in accordance with the approved Response Plan, over a period of two years following building construction;
  - Traffic control, equipment, supplies, and personnel necessary to conduct sampling will be secured;
  - A total of three canisters will collect air for a period of 8 hours. Two of the canisters will be located in the garage and one canister will be located outside of the garage; and
  - An offsite analytical laboratory will analyze the garage air samples for VOCs.
- Task 5: Quarterly Groundwater, Soil Vapor, and In-Garage Air Monitoring Data Transmittal Reports:
  - Eight consecutive quarterly data transmittal reports summarizing the finding of the analytical data will be prepared;
  - Data summary and depth to groundwater tables, groundwater elevation figures, and isoconcentration figures will be prepared; and
  - The reports will be submitted to the regulatory agencies for review and concurrence via GeoTracker.
- Task 6: Groundwater Completion Report:
  - Remedial response activities conducted at the Site will be summarized;
  - Quarterly groundwater monitoring data will be summarized and evaluated;
  - PCE trends in groundwater, soil vapor, and in-garage air monitoring data will be analyzed;
  - A Groundwater Completion Report will be prepared. The report will include tables and figures; and
  - The report will be submitted to the Regional Water Board and State Water Resources Control Board for review and concurrence via GeoTracker.

Contingent PVIMS

If, based on the contingent PVIMS evaluation, ISCO is not effective in reducing the concentration of PCE in soil vapor in the vicinity of Building A prior to the time of development, the contingent PVIMS remedy will be designed and installed. The purpose of the PVIMS would be to mitigate potential risk of elevated concentrations of PCE migrating into the residential units on the ground floor of Building A.

This objective of the PVIMS will be accomplished through the installation of a vapor barrier and subterranean piping beneath the east-west wing of Building A. The subterranean piping will be connected to risers fitted with wind-driven turbine fans. The wind-driven turbine fans will ventilate vapors from beneath east-west portion of Building A to the atmosphere. Sub-slab sampling will be conducted to confirm the PVIMS is operating as designed. The installation, sampling results, and operation and maintenance guidelines will be documented in the PVIMS Completion/Operations, Monitoring, and Maintenance (OMM) Document.

The tasks to be included in the Contingent PVIMS are:

- Task 1: Passive Soil Vapor Mitigation System (PVIMS) Installation:
  - Engineering drawings and specifications will be prepared and submitted to the Regional Water Board, State Water Resources Control Board, and building department for review and approval;
  - A contractor will be contracted with for the installation of the PVIMS;
  - The contractor will install the PVIMS;
  - Oversight will be provided during the installation of the PVIMS; and
  - Confirmation sampling will be conducted.
- Task 2: 6 Sub-Slab Sampling Events:
  - One pre-PVIMS activation sub-slab vapor and 5 post-PVIMS activation sub-slab vapor monitoring events will be conducted. The 1 pre-PVIMS activation and 4 of the 5 post-PVIMS activation sub-slab vapor monitoring events will be conducted quarterly for the first year after activation of the PVIMS;
  - The fifth sub-slab vapor monitoring event will be conducted in the second year of operation of the PVIMS;
  - A total of 5 sub-slab vapor samples will be collected from vapor monitoring points located with the east-west wing of Building A during each monitoring event;
  - The sub-slab vapor samples will be analyzed for VOCs; and
  - Two troubleshooting events will be conducted, as necessary, for the first year.
- Task 3: PVIMS Completion Report/OMM Document:

    - A PVIMS Construction Completion Report and Operation and Maintenance Manual will be prepared. This report will include as-built drawings of the PVIMS;
    - Pre-venting and at least one post-venting sub-slab monitoring event analytical data will be included;
    - The report will be submitted to the regulatory agencies for review and concurrence via GeoTracker; and
    - Concurrence will be obtained from the regulatory agencies that the PVIMS has been installed as designed and the building can be occupied.
- Task 4: Sub-Slab Vapor Monitoring Data Transmittal Reports:
    - A total of five data transmittal reports summarizing the finding of the analytical data will be prepared;
    - Data summary table and figure will be prepared; and
    - The reports will be submitted to the regulatory agencies for review and concurrence via GeoTracker.
- Task 5: PVIMS Performance Monitoring Completion Report:
    - Remedial response activities conducted at the Site will be summarized;
    - Soil vapor, sub-slab vapor, and in-garage air monitoring data collected at the Site during the remedial response actions will be summarized and evaluated;
    - PCE trends in soil vapor, sub-slab vapor, and in-garage air monitoring data will be analyzed;
    - A Soil Vapor, Sub-Slab Vapor, and In-Garage Air Completion Report will be prepared. The report will include tables and figures; and
    - The report will be submitted to the Regional Water Board and State Water Resources Control Board for review and concurrence via GeoTracker.

Site Work and Documentation

All of the Site activities described above will be conducted in the following manner:

- A qualified professional will be used to oversee and document all field activities in standard field logs;
- Soils will be field screen soils for VOCs and all borings will be logged for lithologic purposes;
- Soil boring and well construction completion logs will be prepared;
- All wells will be completed with locking caps and traffic-rated well boxes;

- Sample duplicates, field blanks, trip blanks, and equipment blanks will be collected/prepared and analyzed in accordance with the Quality Assurance/Quality Control procedures as presented in the Field Sampling and Analysis Plan;
- Soil, groundwater, and soil vapor samples will be collected and analyzed in accordance Department of Toxic Substances Control guidelines and/or United States Environmental Protection Agency standard protocols;
- All investigation-derived waste generated during investigation and monitoring activities will be disposed offsite at appropriate waste disposal or recycling facilities; and
- Reports, analytical data, boring logs, and monitoring well construction information will be uploaded to GeoTracker for Regional Water Board and State Water Resources Control Board review.

TABLE OF ITEMS FOR REVIEW

ITEM	DESCRIPTION	CRITICAL DUE DATE	ESTIMATED DUE DATE
SCOPE OF WORK			
	WORK TO BE PERFORMED BY GRANTEE		
	ISCO PILOT TEST		
Task 1	ISCO Pilot Test Work Plan		1Q2019
Task 2	Pre-Injection Delineation in Former Dry Cleaner Area/Well Installation		3Q2019
Task 3	Aquifer Testing/Data Analysis		3Q2019
Task 4	Bench Scale Testing and Baseline GW & SV Sampling		3Q2019
Task 5	ISCO Pilot Test Design Report		3Q2019
Task 6	ISCO Pilot Test - Injections		4Q2019
Task 7	Performance GW and SV Monitoring		4Q2019-1Q2020
Task 8	ISCO Pilot Test Data Evaluation Report		1Q2020
	RESPONSE PLAN		
Task 1	Development of Response Plan		3Q2019
	IMPLEMENT RESPONSE PLAN		
Task 1	Pre-Injection Delineation in Downgradient Area of Site		1Q2020
Task 2	Groundwater Response (ISCO Injections)		2Q2020
Task 3	Quarterly GW and SV Monitoring		2Q, 3Q, 4Q 2020 1Q, 2Q, 3Q, 4Q 2021 1Q 2022
Task 4	In-Garage Air Monitoring in Bldg A		
Task 5	Quarterly GW/SV/In-Garage Air Monitoring Reports		
Task 6	GW Completion Report		2Q 2022
	CONTINGENT PVIMS		
Task 1	Passive Vapor Mitigation System Design/Install		4Q2020 – 1Q2021
Task 2	6 Sub-Slab Sampling Events/2 Troubleshooting Events		
Task 3	PVIMS Installation/OMM Document		
Task 4	Sub-Slab Vapor Monitoring Data Transmittal Reports		
Task 5	PVIMS Performance Monitoring Completion Report		2Q2022
PROJECT MANAGEMENT: Invoicing, Budget Detail, and Reporting Provisions			
A.	INVOICE PACKAGES		
1.	Invoices		Quarterly
B.	REPORTS		
1.	Progress Reports		Quarterly

2.	Final Project Report		Three months following final two-year sampling event

PROJECT BUDGET

TASK #	DESCRIPTION	TOTAL
	ISCO PILOT TEST	
Task 1	ISCO Pilot Test Work Plan	
Task 2	Additional Investigation in Former Dry Cleaner Area/Well Installation	
Task 3	Aquifer Testing/Data Analysis	
Task 4	Bench Scale Testing and Baseline GW and SV Sampling	
Task 5	ISCO Pilot Test Design Report	
Task 6	ISCO Pilot Test	
Task 7	Performance GW and SV Monitoring	
Task 8	ISCO Pilot Test Data Evaluation Report	
	ISCO Pilot Test Total	
	RESPONSE PLAN	
Task 1	Development of Response Plan	
	IMPLEMENT RESPONSE PLAN	
Task 1	Additional Investigation in Downgradient Area of Site	
Task 2	Groundwater Response (ISCO Injections)	
Task 3	Qtrly GW and SV Monitoring	
Task 4	In-Garage Air Monitoring in Bldg A	
Task 5	Quarterly GW/SV/In-Garage Air Monitoring Reports	
Task 6	GW Completion Report	
	Implement Response Plan Total	
	CONTINGENT PVIMS	
Task 1	Passive Vapor Mitigation System Design/Install	
Task 2	6 Sub-Slab Sampling Events/2 Troubleshooting Events	
Task 3	Sub-Slab Vapor Monitoring Data Transmittal Reports	
Task 4	PVIMS Installation/OMM Document	
Task 5	PVIMS Performance Monitoring Completion Report	
	Contingent PVIMS Total	
	PROJECT TOTAL	