

TO: Rick Wenzel
The Dow Chemical Company

FROM: Jim M. McDade
GSI Environmental Inc.

RE: Monthly Status Report, August 2013, Charlie Burch Site, Spring, Texas. VCP No. 421.

Activities Completed During August 2013

- **Groundwater Pump-and-Treat System in Source Area:** The bi-weekly system inspections were conducted on 9 and 23 August 2013. Semi-annual groundwater samples were evaluated to update mass removal estimates and contaminant levels in the portion of the plume directly influenced by the recovery wells. The monthly operation and maintenance inspection was also completed on 5 August 2013.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** A monthly operation and maintenance site inspection was performed on 5 August 2013. The inspection noted that the treated groundwater being reinjected in the Eastern Infiltration Trench (Trench) was backing up indicating that the systems operating flow rates (35-37 gallons per minute [gpm]) into the Trench were overwhelming the Trench's infiltration capacity. The system was shut down upon finding the situation. An evaluation of the Trench was performed on 7 August 2013 and it was determined that the infiltration screen had become partially clogged. After completing the visual inspection, the system was restarted at a reduced flow rate (25 gpm) and monitored to determine if it could handle the reduced infiltration. Upon confirming that capacity of the Infiltration Trench could handle the reduced flows, the system was left on for the remainder of the month. Additional inspections performed on the system in August confirmed all operations were normal at the lower flow rates.
- **Plume Remediation Activities:** Conducted the Phase 5 Enhanced Anaerobic Bioremediation (EAB; downgradient portion of plume) pre-design direct push groundwater investigation during the week of 12 August 2013. The data indicate that the plume has shifted slightly to the west from its 2006 alignment which pre-dated the start of the 13-Acre Tract recovery system and infiltration of treated groundwater. Preparation of a work plan for the Phase 5 EAB activities began upon evaluation of the data and a teleconference call was scheduled for 12 September 2013 with TCEQ to discuss the updated Phase 5 EAB design.

On 12 August 2013, plugged and abandoned wells MW-CB-20AS, MW-CB-21AS, and MW-CB-23AS in accordance with Title 12 Chapter 1901.255 of the Texas Occupational Code and 16 TAC 76.1004, as approved by the TCEQ in a letter dated 2 November 2012.

Continued to work on the agreement to obtain property access for implementing EAB on Warren Wert's property (Phase 3 EAB). Continued negotiating with ICG Rayford

Partners LP to obtain a signed access agreement to enable the Phase 5 remedial well installation and EAB injection activities, and continued working with Productioneered Parts Corporation (Rummell property) to obtain a signed access agreement to enable the Phase 4 activities to be initiated.

- **Miscellaneous:** Continued correspondence with the Source Area landowner's (XOG's) attorney regarding the need to place documentation in the deed records under 30 TAC 350.13(h). A draft access agreement that would contain deed recordation provisions is being discussed.
- **Public Communications and Information Website:** The project website (see below for link) continued to be updated with the prior period's monthly progress report and other relevant documents.

Link to website: <http://charlieburchproject.com/>

Activities Planned for September 2013

The following activities are planned during the next reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** The groundwater recovery system will continue to operate per its operations and maintenance (O&M) manual, and the system inspection and effluent sampling will be performed on a bi-weekly basis.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** The system will continue to operate per its O&M manual, but at a reduced rate until the Infiltration Trench screen can be cleaned out. The clean out is scheduled to occur in the next month. Routine maintenance and the monthly site inspection will be performed.
- **Plume Remediation Activities:** Discussions related to access agreement and remediation alternatives for the portions of the plume underlying the Wert property will be continued, to extent practical. A meeting with the Rummell (Productioneered Parts) property owners to discuss access to the site during remedial activities will be scheduled, and discussions with ICG Rayford Partners LP regarding the downgradient plume properties to obtain a signed access agreement enabling remedial activities (i.e., EAB) to be implemented downgradient of the 13-Acre Tract Pump-and-Treat system (Phase 5 EAB) will be continued.

Design investigations and studies for the Phase 4 EAB and Phase 5 EAB response actions will be continued. Results of the Phase 5 EAB pre-design direct push groundwater investigation will be evaluated, and the Phase 5 EAB design will be completed based on groundwater investigation results. A conference call with TCEQ will be held on 12 September 2013 to discuss Phase 5 EAB pre-design investigation results and design. Modification 07 of the UIC Authorization for the plume will be submitted for approval of Phase 5 EAB injection activities.

- ***Public Communications and Information Website:*** The information on the project website will continue to be updated and maintained to keep the most recent information submitted to TCEQ.