

TO: Rick Wenzel
The Dow Chemical Company

FROM: Jim M. McDade
GSI Environmental Inc.

RE: Monthly Status Report, January 2018, Charlie Burch Site, Spring, Texas. VCP No. 421.

Activities Completed During January 2018

- **Groundwater Pump-and-Treat System in Source Area:** The new air stripper, which is part of the Phase 4 Enhanced Anaerobic Bioremediation (EAB) construction, continued to operate per its design. Bi-weekly effluent sampling was completed on 12 and 26 January 2018, and a monthly operation and maintenance (O&M) system inspection was conducted on 26 January 2018.

On 31 January 2018, the TCEQ emailed a copy of the approved amendment to the Underground Injection Control (UIC) authorization to reinject the treated effluent to the infiltration trench located on the Rummell property east of the site. In addition, the approved amendment authorizes the injection of EAB substrate in up to 50 new substrate injection wells (SIWs), 10 existing SIWs, and 188 temporary injection points (TIPs). Note that Dow has not begun reinjection of the treated effluent, and will not do so until Dow approves the transition to the new infiltration galleries.

- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** The monthly O&M inspection was performed on 26 January 2018. Maintenance activities during January 2018 included the following: i) constructed an access road from Forestry Drive to the treatment compound to enable a carbon change-out to be performed safely; ii) repaired portions of the influent piping that was cracked due to freezing temperatures; iii) replaced all fittings and valves with PVC fittings and valves; and iv) conducted a carbon change of the granular activated carbon (GAC) containers. In addition, the pump at TRW-CB-3 was replaced on 25 January 2018 when it was determined to be no longer functioning.
- **Plume Remediation Activities:** Continued preparations for the Phase 1, 2, and 5 EAB refresh treatment. As noted above, approval of the UIC amendment for substrate injections into new SIWs and TIPs was received by the TCEQ on 31 January 2018. Continued discussion with Mr. Wert regarding access to his property and detailed planning for Phase 3 EAB treatment. Began preparing the UIC semiannual report for the period 1 July to 31 December 2017, documenting the November 2017 semiannual EAB performance groundwater monitoring for Phases 1, 2, 4, and 5.
- **Comprehensive Groundwater Monitoring:** Continued to evaluate the results of the annual groundwater monitoring event and prepare the 2017 annual groundwater monitoring report, which is due to the TCEQ by 1 March 2018.

- **Public Communications and Information Website:** The project website (see below for link) was updated with the prior period's monthly progress report and other relevant documents.

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

Activities Planned for February 2018

The following activities are planned during the next reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** Startup operations of the updated system will continue to be performed and bi-weekly system effluent sampling and monthly system inspections will be conducted. Upon Dow approval, the treated effluent will be redirected into the infiltration trench on the Rummell property, and reinjection will be initiated to the infiltration trench with monthly system effluent sampling in accordance with the amended UIC authorization.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** The system will continue to be operated, and routine inspections and maintenance activities will be conducted.
- **Plume Remediation Activities:** Well installation for Phase 1, 2, and 5 EAB refresh treatments is tentatively scheduled to begin during the first week of February 2018, with injections tentatively scheduled to begin in mid- to late-February. Discussions will continue with Mr. Wert regarding access to his property and detailed planning for Phase 3 EAB treatment on the Wert property will be renewed.

The semiannual UIC report will be finalized and submitted to the TCEQ in February.

- **Comprehensive Groundwater Monitoring:** The annual groundwater monitoring report will continue to be prepared for submittal to the TCEQ in early March 2018.
- **Public Communications and Information Website:** The information on the project website will be updated and maintained with the most recent information submitted to TCEQ.