GSI ENVIRONMENTAL

TO: Ed Tokarski
Rohm and Haas Company

FROM: Jim M. McDade
GSI Environmental Inc.

RE: Monthly Status Report, July 2009, Charlie Burch Site, Spring, Texas.
VCP No. 421.

Activities Completed During July 2009

The following activities were conducted during the subject reporting period:

- ***Groundwater Pump-and-Treat System in Source Area:*** Completed the bi-weekly system operation, maintenance, and monitoring site visits on 10 and 24 July 2009.

  Prepared a draft report, for internal review, which evaluated the 8-hr and 24-hr pumping test data conducted on recovery wells in the source area. Used aquifer hydraulic characteristic data from the 8-hr and 24-hr pumping test to update the groundwater model for the source area pump and treat system. Groundwater level and chemical data from the October 2008 annual groundwater sampling event were input into the groundwater model as a start of the model update.

- ***Groundwater Pump-and-Treat System on the 13-Acre Tract:*** Completed monthly and annual operation and maintenance site inspection on 31 July 2009. During inspection of the pipeline during that visit, a localized wet area was observed between recovery wells CB-RW-03 and CB-RW-04. The system was shut down, and a follow-up inspection held on 3 August 2009 was able to identify the leak at a welded connection that was repaired on Thursday, 6 August 2009. The system was restarted on 6 August 2009 after the repair was completed. The semi-annual Underground Injection Control (UIC) report for the period 1 December 2008 through 31 May 2009 was submitted to TCEQ on 9 July 2009.

- ***Plume Remediation (Annual Groundwater Sampling):*** An annual groundwater report review letter from TCEQ requested Rohm and Haas sample a private well (Lewis well) down gradient from the toe of the plume. Rohm and Haas prepared and submitted a response letter during the subject reporting period which provided technical rationale describing why sampling the well was not appropriate.

- ***Plume Remediation (MaxOx Pilot Study):*** Data collected from the MaxOx pilot study wells in June were received on 7 July 2009 and forwarded to GES. GES continued preparation of a report documenting the MaxOx pilot study results.

- ***Plume Remediation (Enhanced Anaerobic Biodegradation [EAB] Pilot Study):*** Pilot test data was received on 7 July 2009 on two of the injection wells sampled during the May 2009 O&M visit of the 13-acre system. Lab-scale titration studies of pH buffering material were completed and based on the results of titration studies,

Rohm and Haas is planning to inject additional buffer into the injection wells and continue monitoring the pilot study system for an additional six months. Brian Smith of TCEQ's UIC section was contacted regarding the planned additional injections. Mr. Smith indicated that a brief UIC modification letter of the additional injection events would need to be submitted to update the existing authorization. The draft letter was prepared during the subject period and procurement of injection material was initiated.

- ***Information Website:*** Continued to update project information on the website at URL: http://charlieburchproject.com/.

Activities Planned for August 2009

The following activities are planned during the next reporting period:

- ***Groundwater Pump-and-Treat System in Source Area:*** Continue system operation and evaluation of system performance as part of optimization efforts.

  Finalize the 8-hr and 24-hr pumping test report. Continue to update the groundwater model for the source area pump and treat system.

- ***Groundwater Pump-and-Treat System on the 13-Acre Tract:*** Continue system operation, perform required and scheduled maintenance activities, and conduct monthly operation and maintenance site inspection.

- ***Plume Remediation:*** Complete pilot study report for the MaxOx pilot study. Procure and prepare for injection of additional buffer solution into the EAB pilot study formation and continue evaluation of pilot study groundwater data for an additional 6 months of performance monitoring. Additional injections will be coordinated with TCEQ's UIC Section in Austin, Texas, but injections are anticipated to occur in late August 2009.

- ***Innocent Owner/Operator Program (IOP) Certificates:*** Continue to work with the Amerson property legal counsel to obtain signatures and proof of ownership information from all 29 property owners and submit revised IOP application.

- ***Information Website:*** Continue to operate website to provide information regarding work at the Charlie Burch site.