

TO: Ed Tokarski
The Dow Chemical Company

FROM: Jim M. McDade
GSI Environmental Inc.

RE: Monthly Status Report, July 2011, Charlie Burch Site, Spring, Texas.
VCP No. 421.

Activities Completed During July 2011

The following activities were conducted during the subject reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** Completed bi-weekly pump and treat system operation, maintenance, and monitoring site visits on 8 and 22 July 2011. Collected water level elevations in source area monitoring and recovery wells to provide additional input for continuing groundwater modeling efforts.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** Completed monthly and annual operation and maintenance site inspection on 27 July 2011. Submitted the semi-annual underground injection control authorization report to the TCEQ for period 1 December 2010 through 31 May 2011 on 27 July 2011.
- **Comprehensive Groundwater Monitoring Event:** Conducted a static water level survey for all wells south of MW-CB-41S and 41D on 8 July 2011 to evaluate groundwater flow patterns. On 26 July 2011, re-surveyed the top-of-casing and natural ground surface elevations for three MaxOx pilot study wells (INJ-3, OBS-1, and OBS-2) to assess and correct anomalous static water levels observed in recent static water level surveys.
- **Plume Remediation Studies:** Continued the preparation of the multi-phase draft Enhanced Anaerobic Bioremediation (EAB) design and implementation work plan. Met with property owners to discuss locations of proposed injection wells and implementation of planned EAB on their property. Continued to work on finalizing the redesign of the source area pump and treat system.
- **Innocent Owner/Operator Program (IOP) Certificates:** Discussed submittal procedures of revised Amerson property IOP application (IOP No. 691) with TCEQ.
- **Public Communications and Information Website:** Continued to update project information on the site's website at URL: <http://charlieburchproject.com/>.

Activities Planned for August 2011

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 design and initiate procurement of contractor to construct the new groundwater recovery/containment system.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** Continue system operation, and perform required and scheduled annual maintenance activities during the monthly site inspection. A carbon change-out is scheduled for the first week of August.
- **Comprehensive Groundwater Monitoring Event:** Collect a second round of static water level elevations from wells located south of MW-CB-41S to observe groundwater flow patterns to identify any variability in potentiometric flow patterns.
- **Plume Remediation Activities:** Finalize EAB design and work plan for submittal to TCEQ for review. Continue to work with private property owners on implementation of the injections scheduled to begin in Fall 2011.
- **Innocent Owner/Operator Program (IOP) Certificates:** Submit revised Amerson tract IOP application and issue adjacent property notification letters.
- **Public Communications and Information Website:** Continue to operate and maintain information on the project website to keep the most recent information submitted to TCEQ available to the public regarding work at the Charlie Burch site.