

**TO:** Ed Tokarski  
The Dow Chemical Company

**FROM:** Jim M. McDade  
GSI Environmental Inc.

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

### **Activities Completed During November 2011**

The following activities were conducted during the subject reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** Resumed bi-weekly inspections on 4 and 18 November 2011 after the system was down during the month of October due to mechanical and electrical repairs on the system blower and air compressor. Began installation of the new source area recovery system on November 7, 2011, and completed approximately 50% of construction. Recovery well RW-CB-3D was taken off-line on 9 November 2011 to accommodate installation of a concrete vault surrounding RW-CB-3D for the new recovery system.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** Completed the monthly operation and maintenance site inspection and quarterly sampling visit on 23 November 2011.
- **Comprehensive Groundwater Monitoring Event:** Continued evaluating annual groundwater monitoring data from the 2011 sampling event. Obtained permission from Southwestern University and Rayford Business Campus property owners to access their properties to conduct the supplemental lithology and groundwater investigation in the vicinity of MW-CB-45. Surveyed sampling locations in the vicinity of MW-CB-45 and began preparing for sampling program.
- **Plume Remediation Studies:** Continued to work with private property owners on planned implementation of the EAB injections in accordance with the EAB Work Plan submitted to TCEQ on 31 August 2011. Permission to proceed with Phase 1 of EAB was obtained from two of the property owners. The Phase 1 EAB work will begin in January 2012 to avoid interruptions around the holiday season.
- **Innocent Owner/Operator Program (IOP) Certificates:** Awaited TCEQ issuance of IOP certificates to the Amerson property owners.
- **Public Communications and Information Website:** Continued to update project information on the site's website at URL: <http://charlieburchproject.com/>.

### Activities Planned for December 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. Complete construction of the new groundwater recovery/containment system. Test the new recovery/containment system, make adjustments, as needed, take the old recovery wells off-line, and begin operation of new 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.
- **Comprehensive Groundwater Monitoring Event:** Begin site preparations at the Southwestern University and Rayford Business Campus properties. Complete the proposed investigation of groundwater and lithology conditions in the vicinity of MW-CB-45. Continue to evaluate groundwater data collected during the comprehensive groundwater sampling event.
- **Plume Remediation Activities:** Coordinate injection well installation and subsequent injection work with private property owners and vendors (material suppliers, surveyors, etc.). Installation of EAB wells is currently scheduled to begin in January 2012.
- **Innocent Owner/Operator Program (IOP) Certificates:** Anticipate issuance of IOP Certificates by the TCEQ to Amerson property owners.
- **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.