

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

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

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

### **Activities Completed During October 2011**

The following activities were conducted during the subject reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** The source area pump and treat system was not in operation from 30 September to 26 October 2011 due to mechanical and electrical repairs of the system blower. Bi-weekly inspections will resume on 4 November 2011. Completed well development of the new source area system recovery wells, and marked and cleared locations for the source area electrical building and system piping.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** Completed the monthly operation and maintenance site inspection on 31 October 2011.
- **Comprehensive Groundwater Monitoring Event:** Began tabulating results of the comprehensive groundwater monitoring event and site-wide static water level survey. Evaluated the following to assess possible presence of any paleo-channel that could influence flow direction of the 1,2-DCA groundwater plume: i) lithology data from previous site investigations in the vicinity of MW-CB-45; ii) static water elevation surveys conducted at wells south of MW-CB-41S and -41D in July, August, and October 2011; and iii) 1,2-DCA concentrations from the September 2011 groundwater monitoring event. Submitted the evaluation to the TCEQ on 29 October 2011.
- **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. Private property owners requested additional information regarding the injections on their property and overall plume remediation strategy.
- **Innocent Owner/Operator Program (IOP) Certificates:** On 29 October 2011, submitted to the TCEQ copies of all IOP notification letters issued to property owners adjacent to the Amerson property, Certified Mail Receipts, and Return Receipt Requests.
- **Public Communications and Information Website:** Continued to update project information on the site's website at URL: <http://charlieburchproject.com/>.

### Activities Planned for November 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. Restart bi-weekly system inspections on 4 November 2011. Begin construction of 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.
- **Comprehensive Groundwater Monitoring Event:** Begin site preparations at the Southwestern University and Rayford Business Campus properties in order to conduct 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 access and injection well installation work with private property owners and vendors (material suppliers, surveyors, etc.) on implementation of the EAB injections. Installation of EAB wells was scheduled to begin on their properties in October 2011, but property owners have requested additional information before granting access to continue, so a delay in the start of injections is anticipated.
- **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.