

TO: Rick Wenzel
The Dow Chemical Company

FROM: Jim M. McDade
GSI Environmental Inc.

RE: Monthly Status Report, October 2013, Charlie Burch Site, Spring, Texas.
VCP No. 421.

Activities Completed During October 2013

- **Groundwater Pump-and-Treat System in Source Area:** The bi-weekly system inspections were conducted on 4 and 19 October 2013. The monthly operation and maintenance inspection was completed on 2 October 2013. Recovery well RW-CB-3R was restarted on 10 October 2013 after the surge protector device was replaced. A system outage also occurred on 28 October 2013 due to downed power lines and several blown fuses near the entrance to the source area. CenterPoint Energy made repairs the same day and the system was restarted.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** A monthly operation and maintenance site inspection was performed on 2 October 2013. The eastern infiltration trench was water jetted on 4 October 2013 to unclog the infiltration pipe. The pipe was found to be clogged with fine root fibers from the surrounding trees. An operational change plan to the standard operation practice of the infiltration trench will be prepared to include the application of commercially available root killer for routine maintenance, which will be conducted twice each year (Spring and Fall) to minimize the potential for further clogging.
- **Plume Remediation Activities:** Completed the work plan for the Phase 5 Enhanced Anaerobic Bioremediation (EAB) activities based on the data obtained from the pre-design direct push groundwater investigation. The Phase 5 EAB Work Plan was sent to TCEQ by overnight carrier on 2 October 2013. Locations for the Phase 5 EAB injection and performance monitoring well were staked and the brush and small trees cleared on 21 and 29 October 2013, respectively. A signed copy of the access agreement for property maintained by ICG Rayford Partners LP was received on 4 November 2013.

Continued Phase 4 EAB (Rummell property) design and planning, and continued communicating with Production Engineered Parts Corporation regarding renewal of the site access agreement for the Rummell property to enable Phase 4 EAB activities to be performed.

- **Comprehensive Groundwater Monitoring:** The annual groundwater sampling event was completed during the week of 7 October 2013. Results of the sampling event were received, and data evaluation was initiated for the annual report due in February 2014.

- **Miscellaneous:** Received no response to latest correspondence (sent September 2013) with Source Area landowner's (XOG's) attorney regarding the need to place documentation in the deed records under 30 TAC 350.13(h). A draft access agreement that would contain provisions for deed recordation and restrictive covenants is being discussed.
- **Public Communications and Information Website:** The project website (see below for link) continued to be updated with the prior period's monthly progress report and other relevant documents.

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

Activities Planned for November 2013

The following activities are planned during the next reporting period:

- **Groundwater Pump-and-Treat System in Source Area:** The groundwater recovery system will continue to operate per its operations and maintenance (O&M) manual, and the system inspection and effluent sampling will be performed on a bi-weekly basis.
- **Groundwater Pump-and-Treat System on the 13-Acre Tract:** The system will continue to operate per its O&M manual, and routine maintenance activities during the monthly site inspection will be performed. The initial application of root killer will be performed in the eastern infiltration trench.
- **Plume Remediation Activities:** Receipt of the signed access agreement with ICG Rayford Partners LP is anticipated (received on 4 November 2013). Injection well installation is scheduled to begin in early November 2013, with delivery of injection substrate tentatively scheduled for early December 2013.

Discussions related to access agreement and remediation alternatives for the portions of the plume underlying the Wert property (Phase 3 EAB) will be continued, to extent practical. A meeting with the Rummell (Productioneered Parts) property owners to discuss access to the site during remedial activities will continue to be attempted. Design investigations and studies for the Phase 4 EAB response actions will be continued to the extent possible.

- **Comprehensive Groundwater Monitoring:** Continue evaluating the annual groundwater sampling event results and begin preparing the annual monitoring report.
- **Public Communications and Information Website:** The information on the project website will continue to be updated and maintained with the most recent information submitted to TCEQ.