

Issued: October 8, 2018

TO: Brad Wilkinson
The Dow Chemical Company

FROM: Joshua McFarlain (Jacobs), with input from Brian Vanderglas (Parsons)

RE: Monthly Status Report September 2018
Charlie Burch Site, Spring, Texas.
VCP No. 421.

Activities Completed During September 2018

Groundwater Pump-and-Treat System in Source Area:

- Continued operation of the Air Stripper remediation system.
- Bi-weekly effluent sampling events were completed on September 5 and 19.
- Daily pH measurements were collected during operation of the air stripper system, with recovered groundwater being treated and discharged to the adjacent flood channel.
- A monthly operation and maintenance (O&M) system inspection was conducted on September 20.

Groundwater Pump-and-Treat System on the 13-Acre Tract:

- The system continued operating during the month of September.
- A monthly O&M system inspection was conducted on September 20.

Plume Remediation Activities:

- Requested TCEQ approval to extend the submittal date for the 1st Half 2018 (1H2018) semi-annual Underground Injection Control (UIC) report on September 13 to include all injection activities from 2018 completed to date. TCEQ approved extension to October 12, 2018, to allow injections into August to be included in the 1H2018 report. The 2nd Half 2018 report will only cover the period from September 1 through December 31, 2018. Initiated revisions to the semi-annual UIC report to enable the July and August injection activities to be included per discussions.
- Developed a draft amended agreement with new property owner of source area who is interested in developing a portion of the property.
- Completed draft planning documents for MIPS investigation of the groundwater plume located on the Source Property for possible aggressive in situ treatment.

Comprehensive Groundwater Monitoring:

- The site-wide sampling event is scheduled for completion during the month of October.

Public Communications and Information Website:

- The following project website will be updated with the September 2018 monthly progress report: <http://charlieburchproject.com/>.

Activities Planned for October 2018:

The following activities are planned for October:

Groundwater Pump-and-Treat System in Source Area:

- The system will continue to be operated, and bi-weekly system effluent sampling and monthly system inspections will be completed.

Groundwater Pump-and-Treat System on the 13-Acre Tract:

- The system will continue to be operated, and routine inspections and maintenance activities will be conducted.

Plume Remediation Activities:

- Complete site-wide gauging and sampling event
- Complete preparation of revised semi-annual Underground Injection Control report covering the period from January 1 through August 31, 2018 and submit to TCEQ.
- Continue discussions with property owner regarding amendment to the existing agreement that would satisfy lender concerns regarding use of the portion of property planned for development.
- Complete planning documents and preparatory activities, such as mowing, utility locate services, safety planning, for source area investigation of the groundwater plume. The MIPS investigation is tentatively scheduled to begin on or about October 29.