McKesson Corporation
One Post Street, 34th Floor
San Francisco, CA 94104
608.848.4134 Tel

Jean A. Mescher
Director, Environmental Services

McKESSON
Empowering Healthcare

Certified Mail

October 10, 2012

Mr. Ruben Moya, Superfund Remedial Project Manager
Superfund AR/LA Enforcement Section (6SF-RA)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Subject: Monthly Progress Report – September 2012
Arkwood, Inc. Site, Omaha, Arkansas

Dear Mr. Moya:

Pursuant to Section IX (B) of the corrected Consent Decree in this matter, the following letter report is Millbrook Distribution Services' (MMI) monthly progress report.

I. CURRENT ACTIVITIES

The following is a general description of Work (as defined in the Consent Decree) activities commenced or completed during this reporting period:

During September, we operated the main treatment system, collected operational samples and conducted Site maintenance activities. In addition to collecting samples for laboratory analysis of pentachlorophenol, field samples were collected to measure pH, temperature and dissolved oxygen. At the request of the ADEQ, the effluent sample collection location will be documented each month since it will vary depending on flow conditions. Injection of non-ozonated water on the main site was discontinued prior to the sample collection. Water samples were collected on September 24, 2012. The analytical data was forwarded to you and Mr. Mark Moix of the ADEQ when it was available. A summary of the data is attached for reference. Samples at the spring mouth and weir will continue to be collected once per month.

II. PROJECT DATA

Attached.

III. PROJECTED ACTIVITIES

October: MMI plans to continue ongoing operations and Site maintenance activities. A response to the additional comments from the EPA dated August 22, 2012 on the groundwater remediation summary will be submitted by October 12, 2012. In addition, an evaluation of the affect on the Arkwood Site for the EPA's recent change in dioxin standard is being prepared for submittal to the agencies.

9412131

November: MMI plans to continue ongoing operations and Site maintenance activities.
December: MMI plans to continue ongoing operations and Site maintenance activities.

IV. PROBLEMS ENCOUNTERED OR ANTICIPATED
None.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this monthly progress report, please do not hesitate to contact me at (608) 848-4134.

Sincerely,

Jean A. Mescher, Project Coordinator
Director, Environmental Services

Enclosure

Copy:
- Mark Moix, ADEQ*
- EPA Assistant Regional Counsel (6C-WA)* (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E)* (w/o enclosure)

*** CERTIFIED MAIL**

Arkwood, Inc. Site: Ozone Injection Pilot Study

Date	Variables		Spring	PCP	
	Water Inj	O3 Inj	Flow	Mouth	Weir
12/8/05			5		
12/9/05	35		5		
12/14/05	35	1lb/10 g	21	28	
12/15/05	35	1lb/10 g	30/27	29.3	
12/20/05	36	1lb/10 g	27	7.39	<5.10
12/26/05	36	1lb/10 g	27	11.4	11.1
1/2/06	36	1lb/10 g	21	42.4	35.1
1/9/06	36	1lb/10 g	20	32.4	33
1/16/06	36	1lb/10 g	27.5	32.3	<5.00
1/23/06	36	1lb/10 g	34/32	15.9	<5.00
1/30/06	36	1lb/10 g	41	34.3	<5.00
2/6/06	36	1lb/10 g	38	<5.10	<5.00
2/13/06	36	1lb/10 g	34	23.9	<5.00
2/20/06	36	1lb/10 g	21	5.53	4.19J
2/27/06	36	1lb/10 g	26	19.9	<5.00
3/6/06	34	1-2lb/10 g	16	25.1	<5.00
3/13/06	33	1-2lb/10 g	57	107	<5.00
3/20/06	32	1-2lb/10 g	48	26.2	<5.00
3/27/06	32	1-2lb/10 g	27	4.09J	<5.00
4/3/06	34	2-3lb/10 g	24	11.3	<5.00
4/10/06	33	2-3lb/10 g	16.4	39.3	<5.00
4/17/06	34	2-3lb/10 g	22	7.94	7.82
4/24/06	35	2-3lb/10 g	16	7.0	<5.00
4/27/06	33	2-3lb/10 g	50	11.3	NA
4/29/06	33	2-3lb/10 g	193	28.2	NA
5/1/06	33	2-3lb/10 g	94	23.4	7.16
5/8/06	33	2-3lb/10 g	59	52.3	23.3
5/15/06	34	2-3lb/10 g	21.7	14.9	<5.00
5/22/06	34	2-3lb/10 g	16	<5.00	<5.00
5/30/06	34	2-3lb/10 g	16.7	5.64	<5.00
6/7/06	0	0	3	253	<5.00
6/12/06	0	0	2.19	LE	LE
6/19/06	34	0	16.7	52.1	14.3
6/26/06	34	0	16.7	74.7	<5.00
7/5/06	35	0	21.7	9.8	<5.00
7/17/06	34	0	16.7	21.9	4.01J
8/7/06	34	0	16.7	23.6	18
8/14/06	34	0	16.7	<5.00	5.22
9/5-6/06	34	0	23	6.57	<5.10
9/18/06	34	0	24	6.29	<5.00
10/2/06	34	0	24	16.8	<5.00
10/16/06	34	2-3lb/10 g	41	39.6	2.22J
10/16/06	34	5-6lb/10g	81	92.3	19.4
10/18/06	34	5-6lb/10g	27	118	<5.00
11/7/06	35	2-4lb/10g	41	52.7	4.70J
11/20/06	35	2-4lb/10g	24	57.4	<5.00
11/30/06	35	5-6lb/10g	636	<50.0	<5.00
12/4/06	35	5-6lb/10g	59	<54.3	<5.00
12/6/06	35	5-6lb/10g	37	<52.6	<5.00
12/18/06	35	2-3lb/10 g	21	24.1	<5.00
1/8/07	35	2-3lb/10 g	21	16.7	<5.00
1/22/07	35	2-3lb/10 g	79	34.6	<5.00
2/5/07	35	2-3lb/10 g	27	25.9	<5.00

2/19/07	35	2-3lb/10 g	47	19.6	<5.00
3/5/07	35	2-3lb/10 g	27	<5.00	<5.00
3/19/07	35	2-3lb/10 g	25	NA	NA
4/9/07	35	2-3lb/10 g	23	<5.00	<5.00
4/23/07	35	2-3lb/10 g	30	7.27	<5.00
5/7/07	35	2-3lb/10 g	21	2.90J	<5.00
5/21/07	35	2-3lb/10 g	20	4.36J	<5.00
6/4/07	35	2-3lb/10 g	20	<5.00	<5.00
6/18/07	35	0	21	9.62	<5.00
7/9/07	35	0	20	15.0	<5.00
7/23/07	35	0	18	8.65	<5.00
8/6/07	0	0	1	191	9.19
9/10/07	35	0	23	217	26.4
9/24/07	35	0	18	16.2	19.4
10/10/07	35	2-3lb/10 g	18	5.63	1.15J
10/22/07	35	2-4lb/10g	18	1190	53.7
11/5/07	35	2-4lb/10g	18	209	7.93
11/19/07	35	2-4lb/10g	18	19.8	24.1
12/3/07	35	2-4lb/10g	18	20.1	<5.00
12/17/07	36	2-4lb/10g	32	87.4	1.20J
1/7/08	36	2-4lb/10g	23	<5.00	<5.00
1/21/08	36	2-4lb/10g	23	58	<5.00
2/4/08	36	2-4lb/10g	24	52	<5.00
2/18/08	35	2-4lb/10g	83	57	15
3/3/08	35	5-6lb/10g	580	<5.00	<5.00
3/17/08	35	5-6lb/10g	44	11	<5.00
4/7/08	35	5-6lb/10g	78	10	<5.00
4/12/08	35	5-6lb/10g	240	6.5	NA
4/13/08	35	5-6lb/10g	100	6.8	NA
4/14/08	35	5-6lb/10g	78	8.2	NA
5/10/08	36	5-6lb/10g	68	75	<5.00
5/27/08	0	0	18	189	<5.00
6/9/08	35	2-4lb/10g	30	77	<5.00
6/23/08	35	2-4lb/10g	580	5.6	<5.00
7/7/08	35	2-4lb/10g	80	194	189
7/10/08	35	5-6lb/10g	140	254	20
7/21/08	35	5-6lb/10g	42	477	<5.00
8/4/08	35	2-4lb/10g	22	108	14
8/18/08	35	2-4lb/10g	36	31	<5.00
9/1/08	35	2-4lb/10g	25	32	<5.00
9/22/08	35	2-4lb/10g	40	22	<5.00
10/6/08	35	2-4lb/10g	21	20	<5.00
10/20/08	33	2-4lb/10g	21	13	<5.00
11/3/08	35	2-4lb/10g	24	<5.00	<5.00
11/17/08	35	2-4lb/10g	30	28	<5.00
12/1/08	35	2-4lb/10g	24	12	<5.00
12/22/08	33	2-4lb/10g	24	<5.00	<5.00
1/5/09	35	2-4lb/10g	32	7.3	<5.00
1/26/09	32	2-4lb/10g	27	<5.00	<5.00
2/9/09	33	2-4lb/10g	90	<5.00	<5.00
2/23/09	33	2-4lb/10g	31	6	<5.00
3/9/09	34	2-4lb/10g	30	5.7	<5.00
3/23/09	33	2-4lb/10g	30	<5.00	<5.00
4/6/09	32	2-4lb/10g	38	5.8	<5.00
4/20/09	32	2-4lb/10g	243	8.5	<5.00
5/4/09	33	2-4lb/10g	343	8.2	8.7
5/18/09	33	2-4lb/10g	51	6.2	<5.00

6/8/09	35	2-4lb/10g	38	<5.00	<5.00
6/29/08	33	2-4lb/10g	25	9.1	<5.00
7/20/09	32	2-4lb/10g	47	39	<5.00
8/10/09	32	2-4lb/10g	23.7	31	<5.00
9/13/09	32	0	22	8	<5.00
10/12/09	32	0	104	21	<5.00
11/9/09	32	0	45	<50	<5.00
12/7/09	32	0	28	8.2	<5.00
1/10/10	32	0	42	13	<5.00
2/15/10	32	0	87	11.1	<5.00
3/15/10	32	0	35	<5.00	<5.00
4/15/10	32	0	40	9.62	<5.00
5/17/10	32	0	180	11	<5.00
6/13/10	32	0	43	15	<5.00
7/8/10	32	0	33	66	<2
8/19/10	0-20	0	17	16.3	<5.00
9/21/10	34	0	33	28.2	<5.00
10/18/10	37	0	20	14.9	<10.00
11/20/10	37	0	21	4.89	<4.00
12/16/10	37	0	24	6.15	<5.00
1/18/11	37	0	23	3.39	2.86
2/9/11	37	0	27	10.4	<10.0
3/17/11	37	0	49	14.2	<5.00
4/19/11	37	0	58	12.5	<5.00
5/2/11	0	0	310	11	NA
5/3/11	0	0	271	8.92	NA
5/4/11	0	0	156	10.8	NA
5/4/11	0	0	123	15.8	NA
5/5/11	0	0	83	18	NA
5/9/11	0	0	34	43.8	<5.00
6/9/11	0	0	7	52.4	<5.00
7/18/11	0	0	0.5	18.6	<5.00
8/15/11	0	0	1	38.9	<5.00
9/13/11	0	0	0.1	<5.00	<5.00
10/18/11	0	0	24	52.4	<5.00
11/16/11	37	0	30	30.6	<5.00
12/19/11	37	0	60	11.5	<5.00
1/19/12	37	0	32	<5.00	<5.00
2/14/12	37	0	41	6.68	<5.00
3/29/12	37	0	51	7.95	<5.00
4/18/12	37	0	23	20	<5.00
5/23/12	37	0	18	10.9	<5.00
6/11/12	37	0	17	7.13	<5.15
7/30/12	37	0	15	5.68	<5.00
8/24/12	37	0	14	<5.00	<5.00
9/24/12	0	0	0.4	73.2	<5.00

Weir		
pH	Temp	DO
7.46	17.57	341.9

NOTES: Flow rates in gallons per minute (gpm)
O3 injection rates in pounds per 10 gallons
PCP concentrations in parts per billion (ppb)
NA - not analyzed
LE - Lab Error - samples not usable

Arkansas Analytical Inc.

11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

02 October 2012

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221

RE: Arkwood Monthly Sampling

SDG Number: 1209285

Enclosed are the results of analyses for samples received by the laboratory on 25-Sep-12 09:45. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Preservation Confirmed	✓
Received On Ice	✓
Temperature on Receipt	2.0°C

Sincerely,

Norma James

Norma James
President

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02 October 2012

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Date Received: 25-Sep-12 09:45

CASE NARRATIVE

Sample Delivery Group – 1209285

Qualified Analytical and/or Quality Control Results are Discussed Below:

Semivolatiles Analysis:
The three compounds labeled (surr) on the attached final report are "surrogates." Recovery of surrogates is for lab use only to determine the effectiveness of the extraction procedure; surrogate recoveries are not analytical results. The three surrogate compounds are as follows: 2,4,6-tribromophenol, 2-fluorophenol, and Phenol-d5.

This report must be reproduced in its entirety.

02 October 2012

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Arkansas Analytical Inc.

Date Received: 25-Sep-12 09:45

ANALYTICAL RESULTS

Lab Number: 1209285-01
Sample Name: Mouth
Date/Time Collected: 9/24/12 14:54
Sample Matrix: Water

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	**73.2**		9/27/12 16:43	A209318	8270D
2,4,6-Tribromophenol [surr]	%	98.7		9/27/12 16:43	A209318	8270D
2-Fluorophenol [surr]	%	58.9		9/27/12 16:43	A209318	8270D
Phenol-d5 [surr]	%	32.2		9/27/12 16:43	A209318	8270D

ANALYTICAL RESULTS

Lab Number: 1209285-02
Sample Name: Weir
Date/Time Collected: 9/24/12 14:15
Sample Matrix: Water

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	< 5.00		9/27/12 17:04	A209318	8270D
2,4,6-Tribromophenol [surr]	%	43.9		9/27/12 17:04	A209318	8270D
2-Fluorophenol [surr]	%	18.0		9/27/12 17:04	A209318	8270D
Phenol-d5 [surr]	%	13.7		9/27/12 17:04	A209318	8270D

This report must be reproduced in its entirety.

02 October 2012

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Arkansas Analytical Inc.

Date Received: 25-Sep-12 09:45

QUALITY CONTROL RESULTS

Semivolatiles - Quality Control
Analyzed: 27-Sep-12 15:18 By: TB

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A209318 - 3510C Modified										
Blank (A209318-BLK1)				Prepared: 25-Sep-12 Analyzed: 27-Sep-12						
Pentachlorophenol	ND	5.00	ug/L							
Surrogate: 2,4,6-Tribromophenol	*38.9*		"	*40.0*		*97.2*	*19.3-113*			
Surrogate: 2-Fluorophenol	*24.0*		"	*40.0*		*60.0*	*13-75.4*			
Surrogate: Phenol-d5	*13.2*		"	*40.0*		*33.0*	*13.1-75.2*			
LCS (A209318-BS1)				Prepared: 25-Sep-12 Analyzed: 27-Sep-12						
Pentachlorophenol	41.9	5.00	ug/L	40.0		105	48.5-124			
Surrogate: 2,4,6-Tribromophenol	*41.8*		"	*40.0*		*105*	*19.3-113*			
Surrogate: 2-Fluorophenol	*22.9*		"	*40.0*		*57.2*	*13-75.4*			
Surrogate: Phenol-d5	*15.8*		"	*40.0*		*39.4*	*13.1-75.2*			
Matrix Spike (A209318-MS1)		**Source: 1209285-01**		Prepared: 25-Sep-12 Analyzed: 27-Sep-12						
Pentachlorophenol	154	10.0	ug/L	80.0	73.2	101	29.2-146			
Surrogate: 2,4,6-Tribromophenol	*80.7*		"	*80.0*		*101*	*19.3-113*			
Surrogate: 2-Fluorophenol	*42.6*		"	*80.0*		*53.3*	*13-75.4*			
Surrogate: Phenol-d5	*29.9*		"	*80.0*		*37.4*	*13.1-75.2*			
Matrix Spike Dup (A209318-MSD1)		**Source: 1209285-01**		Prepared: 25-Sep-12 Analyzed: 27-Sep-12						
Pentachlorophenol	163	10.0	ug/L	80.0	73.2	112	29.2-146	5.95	25.6	
Surrogate: 2,4,6-Tribromophenol	*81.5*		"	*80.0*		*102*	*19.3-113*			
Surrogate: 2-Fluorophenol	*40.8*		"	*80.0*		*51.0*	*13-75.4*			
Surrogate: Phenol-d5	*28.0*		"	*80.0*		*35.0*	*13.1-75.2*			

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods, 20th Edition.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: Norma James

Norma James
President

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Arkansas Analytical Inc.

11701 Interstate 30, Bldg. 1, Ste. 115
Little Rock, AR 72209
PHONE: 501-455-3233
FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION	Project Description	Turnaround Time	Preservation Codes:	
Oxford Environmental & Safety, Inc.	Arkwood Monthly Sampling	24 Hour	1. Cool, 4 Degrees Centigrade	4. Thiosulfate for Dechlorination
14348 Nieman Rd.		48 Hour	2. Sulfuric Acid (H_2SO_4), pH < 2	5. Hydrochloric Acid(HCl)
Overland Park KS 66221	Reporting Information	72 Hour	3. Nitric Acid (HNO_3), pH < 2	6. Sodium Hydroxide (NaOH), pH > 12
	Telephone: 913-706-3422	Routine (5 Day)	TEST PARAMETERS	Bottle Type Code
Attn: Jim Fleer	Email: jfleer@oxfordeands.com	Preservative Code:	1	G = Glass; P = Plastic
		Bottle Type:	GA	V = Septum; A = Amber

Sampler(s) Signature: [signature]

Sampler(s) Printed: James Fleer

Field Number	SAMPLE COLLECTION Date/s	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	SAMPLE IDENTIFICATION/ DESCRIPTION	Pentachlorophenol (8270D)	Arkansas Analytical Work Order Number: 1209285
	9/24/12	14:54	X		1	Water	Mouth	X	01
	9/24/12	14:15	X		1	Water	Weir	X	02

1. Relinquished by: (Signature)	Date/Time	2. Received by: (Signature)
[signature]	9/24/2012 16:30	UPS
3. Relinquished by: (Signature)	Date/Time	4. Received by lab: (Signature)
UPS	9/25/12 0945	Sydney James

SAMPLE CONDITION UPON RECEIPT IN LAB		
1. CUSTODY SEALS:	✓ Yes	___ No
2. CONTAINERS CORRECT:	___ Yes	___ No
3. COC/LABELS AGREE:	___ Yes	___ No
4. PRESERVATION CONFIRMED:	___ Yes	___ No
5. RECEIVED ON ICE:	___ Yes	___ No
6. TEMPERATURE ON RECEIPT:	2°C	
FOR COMPLETION BY LAB ONLY		

REMARKS / SAMPLE COMMENTS		
MS/MSD Collected from: Mouth		
O_3 Power = 10%	Mouth	Weir
O_3 Conc = 12.0	pH = 6.80	7.46
Res O_3 > 2.56 ppm	Temp = 13.92°C	17.57 °C
Flowrate = 0.40	DO = 41.6%	341.9 %

Revision 1
12/1/10

02 October 2012
Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Date Received: 25-Sep-12 09:45

CHAIN OF CUSTODY FORM(S)

This report must be reproduced in its entirety.