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

August 22, 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 – July 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 July, we operated the treatment system, collected operational samples, continued injection of non-ozonated water on the main site and conducted Site maintenance activities. Operational water samples were collected on July 30, 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.

Comments from the EPA and ADEQ were received on the groundwater remediation summary.

II. PROJECT DATA

Attached.

III. PROJECTED ACTIVITIES

August: MMI plans to continue ongoing operations and Site maintenance activities. Pending agency approval, the injection of non-ozonated water will be discontinued for one year to evaluate for rebound effects. A response to the agencies' comments on the groundwater remediation summary was submitted.
September: MMI plans to continue ongoing operations and Site maintenance activities.
October: MMI plans to continue ongoing operations and Site maintenance activities.

9412132

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

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

REVISED REPORT

Arkansas Analytical Inc.

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

17 August 2012

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

RE: Arkwood Monthly Sampling

SDG Number: 1207302

Enclosed are the results of analyses for samples received by the laboratory on 31-Jul-12 09:50. 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	4.0°C

Sincerely,

Norma James

Norma James
President

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17 August 2012

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

Arkansas Analytical Inc.

Date Received: 31-Jul-12 09:50

REVISED REPORT

CASE NARRATIVE

Sample Delivery Group – 1207302

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.

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

Surrogate Failure: The surrogates 2,4,6-Tribromophenol and Phenol-d5 failed to recover within acceptance criteria in sample 1207302-02 (Weir). The surrogate recoveries were qualified by "%D3" and Pentachlorophenol was qualified as "estimated" (E1) for sample 1207302-02. Please note the surrogate 2,4,6-Tribromophenol had no recovery at all. This surrogate also had no recovery in the MS and MSD samples for which sample 1207302-02 (Weir) was used as the parent sample indicating a problem with the sample matrix.

This report must be reproduced in its entirety.

17 August 2012

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

Arkansas Analytical Inc.

Date Received: 31-Jul-12 09:50

REVISED REPORT

ANALYTICAL RESULTS

Lab Number: 1207302-01
Sample Name: Mouth
Date/Time Collected: 7/30/12 10:40
Sample Matrix: Water

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	**5.68**		8/5/12 17:52	A208019	8270D
2,4,6-Tribromophenol [surr]	%	111		8/5/12 17:52	A208019	8270D
2-Fluorophenol [surr]	%	51.7		8/5/12 17:52	A208019	8270D
Phenol-d5 [surr]	%	31.5		8/5/12 17:52	A208019	8270D

ANALYTICAL RESULTS

Lab Number: 1207302-02
Sample Name: Weir
Date/Time Collected: 7/30/12 10:30
Sample Matrix: Water

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	< 5.00	E1	8/5/12 18:14	A208019	8270D
2,4,6-Tribromophenol [surr]	%	NREC	NREC	8/5/12 18:14	A208019	8270D
2-Fluorophenol [surr]	%	21.3		8/5/12 18:14	A208019	8270D
Phenol-d5 [surr]	%	11.3	%D3	8/5/12 18:14	A208019	8270D

QUALITY CONTROL RESULTS

Semivolatiles -- Batch: A208019 (Water)
Prepared: 01-Aug-12 15:14 By: KR -- Analyzed: 05-Aug-12 17:31 By: LR

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Pentachlorophenol	<5.00 ug/L	121% / NA	77.8% / 80.6%		3.11%	
2,4,6-Tribromophenol [surr]	107 %	113% / NA	No Rec / No Rec		NA	NREC
2-Fluorophenol [surr]	51.8 %	53.1% / NA	26.4% / 29.1%		NA	
Phenol-d5 [surr]	31.8 %	37.5% / NA	16.4% / 18.8%		NA	

QUALIFIER(S)

*%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
*E1: Estimated Result Due to Surrogate Failure
*NREC: No Recovery

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
President

This report must be reproduced in its entirety.

17 August 2012

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

REVISED REPORT

Date Received: 31-Jul-12 09:50

CHAIN OF CUSTODY FORM(S)

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: 120730-
	7/30/2012	10:40	X		1	Water	Mouth	X	01
	7/30/2012	10:30	X		1	Water	Weir	X	02

1. Relinquished by: (Signature)	Date/Time	2. Received by: (Signature)	SAMPLE CONDITION UPON RECEIPT IN LAB	REMARKS / SAMPLE COMMENTS
[signature]	7/30/2012 13:00	FedEx	1. CUSTODY SEALS: ✓ Yes ___ No	MS/MSD Collected from: Weir
			2. CONTAINERS CORRECT: ___ Yes ___ No	O_3 Power: 50%
			3. COC/LABELS AGREE: ___ Yes ___ No	O_3 Conc: 32.2 g/Nm^3
3. Relinquished by: (Signature)	Date/Time	4. Received by lab: (Signature)	4. PRESERVATION CONFIRMED: ___ Yes ___ No	Residual O_3: 3.19 ppm
FedEx	7/31/12 0950	Sydney James	5. RECEIVED ON ICE: ___ Yes ___ No	Flowrate: 15.10
			6. TEMPERATURE ON RECEIPT: 4°C	
			FOR COMPLETION BY LAB ONLY	

Revision 1
12/1/10

This report must be reproduced in its entirety.