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May 3, 2005

Mr. Syed Quadri
 Western New York Remediation Section
 Emergency and Remedial Response Division
 United States Environmental
 Protection Agency, Region II
 290 Broadway, 20th Floor
 New York, NY 10007-1866

Dear Mr. Quadri:

Re: Administrative Orders
 Hooker Chemical/Ruco Polymer Corporation Site
 Index Nos. II-CERCLA-80216, II-CERCLA-94-0210, and II-CERCLA-02-2001-2018

Consistent with Sections 42, 91, and 55 of the above-referenced orders, this letter and attached Table 1 provide the progress report for the month of April 2005.

In summary, the following activities were performed in April 2005.

- i) Continue operation and monitoring of the GP-1/GP-3 supplemental treatment system.
- ii) Well GP-3 resumed pumping on April 8, 2005 and ran until April 19, 2005 when operational problems occurred. As of May 2, 2005 pumping of GP-3 had not yet resumed. Air discharge samples from the GP-1/GP-3 supplemental treatment system were collected by MSRMI on April 12, 2005 while GP-3 was pumping. The results showed the system is operating satisfactorily.
- iii) Negotiations are ongoing between MSRMI and Northrop regarding the purchase offer for the M-1 property for the proposed control center. While no formal agreement has been reached, it is believed that an agreement in principal exists between MSRMI and Northrop for the purchase of the M-1 property and that a formal agreement is about complete.
- iv) A request for access for the injection wells to be installed on Town of Oyster Bay property was submitted on March 16, 2005. The request requires the submittal of a bond and

insurance certificate by the well installer. Since the well installer has not yet been selected, Town approval has not been received. It is expected that once the installer is selected and the bond and certificate submitted, access permission will be given.

v) A draft Request for Bid (RFB) has been prepared for the injection and monitoring wells and another has been prepared for the remainder of the biosparge remedy in anticipation of receipt of EPA approval of the 100% Design. It should be noted that preliminary contacts with various contractors are discouraging based on both very limited availability and significantly inflated costs. MSRMI remains committed to complete the requirements of the ROD, however some construction delays might be encountered given the heavy industrial activity in the Hicksville area.

vi) Discussions are ongoing between MSRMI and Bayer regarding AOC 45 in which soil with PCB concentrations greater than 50 ppm were identified during the Phase II RFI performed by Bayer.

vii) Participated in the April 7, 2005 Technical Advisory Committee Meeting.

In summary, the following activities are planned for May 2005:

i) Awaiting EPA approval of the 100% Design submitted March 14, 2005 for the biosparge remedy. Upon receipt of EPA concurrence of the revisions, copies of the 100% Design will be distributed in accordance with the Administrative Order.

ii) Awaiting EPA comments on the OU-1 RA Implementation Report submitted on March 18, 2002.

iii) Complete negotiations with Northrop regarding access issues and property acquisition for the biosparge system control center.

iv) Continue with contractor review/selection process to minimize time prior to (and during) the initial construction phase of the proposed Biosparge remedy.

v) Closure of 6 offsite and 20 onsite shallow groundwater monitoring wells. Closure to be performed when biosparge well installation contractor is on Site.

vi) Continue working with Bayer to address recently identified soil with elevated PCB concentrations in AOC 45.

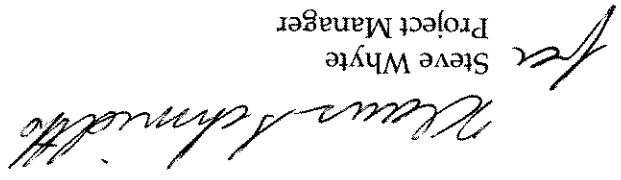
vii) Resume monitoring of the GP-1/GP-3 supplemental system when pumping of GP-3 restarts.

viii) Collect groundwater samples from wells E-1 and Sump 1 (F-1) and soil samples from the vicinity of E-1 and Sump 1 to evaluate the effect of the last 3 years of natural soil flushing in the E-1 area and enhanced soil flushing in Sump 1. Sampling will be performed when the biosparge well installation contractor is on Site.

Additional details will be provided in future monthly progress reports if needed based on the level of activities performed.

Should you have any questions on the above, please do not hesitate to contact me at (859) 543-2151 or e-mail at steve_whyte@oxy.com.

Sincerely yours,


Steve Whyte
Project Manager

KDS/mw/6883/169

Encl.

c.c.: K. Lynch (USEPA)
M. E. Wieder (USEPA)
S. Scharf (NYSDEC)
T. Kelly (Nassau County)
J. Robinson (Bayer)
J. Kay (CRA)

TABLE 1

MILLER SPRINGS REMEDIATION MANAGEMENT, INC.
 HOOKER/RUCO SITE
 HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Rucro Property (OU-3)
 April 2005

Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
• Work Plan	100	July 1993		September 23, 1993
• Borehole/Well Installation (MW-50, MW-53, MW-54 and MW-55)	100	September 30, 1994		June 19, 1995
• Well Development, Sampling and Analysis	100	July 10, 1995		August 9, 1995
• Water Level Measurements	100	August 15, 1995		April, 1996
• Interim Report	100	May 23, 1995		June 15, 1995
• Interim Report - Addendum No. 1	100	July 28, 1995		August 2, 1995
• Gruman Production Wells Sample Collection and Analysis	100	August 1, 1995		October 4, 1995
• Well Installation (MW-51, MW-52, MW-56 and MW-57)	100	August 30, 1995		January 26, 1996
• Regional Groundwater Level Monitoring Event	100	October 3, 1995		October 3, 1995
• Well Development, Sampling and Analysis	100	January 22, 1996		July 5, 1996
• Gruman Groundwater Model	100	July 27, 1995		November 20, 1997
• Phase I Report	100	February 21, 1996		April 26, 1996
• Supporting Documentation Regarding the Effectiveness of In Situ Remediation	100	June 10, 1996		August 9, 1996
• Phase II Report	100	February 21, 1996		August 12, 1996
• Comments on DEC Draft Supplemental Feasibility Study	100	September 23, 1996		October 17, 1996
• Responses to Northrop Comments on the Phase I Report	100	April 17, 1997		June 6, 1997
• Comments on DEC Supplemental Feasibility Study	100	June 1, 1997		June 20, 1997
• Comments on Navy Regional Groundwater Feasibility Study	100	July 28, 1997		October 8, 1997
• Revised Pages for Navy Regional Groundwater Feasibility Study	100	July 28, 1997		November 3, 1997
• Comments on Groundwater Flow Model Report	100	November 20, 1997		December 5, 1997
• Comments on Draft Final Regional Groundwater Feasibility Study	100	March 27, 1998		May 1, 1998
• Comments on Northrop Letter Report	100	May 20, 1998		June 4, 1998
• Evaluation of MW-52 Area Groundwater Extraction System	100	July 1, 1998		July 29, 1998
• Remedial Investigation Report	100	December 1, 1998		January 21, 1999
• Feasibility Study Report	100	December 1, 1998		March 16, 1999
• Groundwater Treatability Study (GTS)	100	December 16, 1998		July 19, 1999
• Responses to EPA Comments on RI Report	100	May 25, 1999		June 11, 1999
• Responses to EPA Comments on FS Report	100	June 21, 1999		July 7, 1999
• Scope of Pre-design Investigative Activities - Initial	100	June 1, 1999		June 11, 1999
• - Revised	100	February 16, 2001		May 28, 2001
• Revised RI Report	100	May 25, 1999		November 16, 1999
• Revised FS Report	100	July 7, 1999		December 22, 1999
• Responses to EPA Comments on GTS	100	October 14, 1999		November 3, 1999
• Responses to EPA Comments on FS Report Responses	100	October 14, 1999		November 3, 1999
• Obtain access agreements	100	June 1999		December 2001
• Final RI Report	100	March 15, 2000		July 21, 2000
• Final FS Report	100	April 10, 2000		July 25, 2000
• PRAP	100			July 28, 2000

MILLER SPRINGS REMEDIATION MANAGEMENT, INC.
 HOOKER/RUCO SITE
 HICKSVILLE, NEW YORK
 Groundwater Investigations Beyond the Ruco Property (OU-3)
 April 2005

TABLE 1

Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
• ROD	100			September 29, 2000
• Unilateral Administrative Order	100			April 26, 2001
• Evaluate VCM presence in CP-3	100			August 15, 2001
• Design Supplemental System for VCM in CP-3	100	August 15, 2001		December 2001
• EPA Conditional Approval for Pre-design Activities	100			September 28, 2001
• Issued Request for Bid for Well Installation	100			October 26, 2001
• Contractor Arrangements	100			January 15, 2002
• Arrangements for Biosparge Testing of Existing Wells	100			April 12, 2002
• Biosparge Testing of Existing Wells	100	April 15, 2002		August 13, 2002
• Phase 1 Well Installation	100	February 4, 2002		June 28, 2002
• Upgrade of CP-1/CP-3 Treatment System	100	April 8, 2002		July 9, 2003
• Sample Wells	100	June 17, 2002		July 12, 2002
• Evaluate Pre-Design Information / Develop Scope of Biosparge Remedy	100	December 18, 2002		November 22, 2002
• Install 2 Additional Wells (MW-67/68)	100			February 14, 2003
• Sample Wells MW-67 & MW-68	100			March 25/26, 2003
• Responses to EPA comments on Pre-design Information Report	100	March 6, 2003		March 27, 2003
• EPA Meeting	100			April 17, 2003
• Closed Well T-1	100			May 12, 2003
• MW-67/68 Installation Report	100			May 23, 2003
• Responses to EPA comments on March 27, 2003 Responses	100	June 25, 2003		July 29, 2003
• Pre-Final (95%) RD Report	100	July 7, 2003		October 31, 2003
• Responses to EPA comments on 95% RD Report	100	April 12, 2004		May 27, 2004
• Submitted Due Diligence Request to Northrop	100			May 10, 2004
• Follow up Due Diligence Clarification to Northrop 6/11 Data Package	100			June 25, 2004
• Offer to Northrop for Property Purchase	100			October 1, 2004
• Sample 13 Wells and Submit Results	100	August 23, 2004		October 14, 2004
• Responses to EPA Comments on 95% RD Report	100	November 17, 2004		December 6, 2004
• Revised Property Purchase offer submitted to Northrop	100	December 22, 2004		December 22, 2004
• Prepare 100% RD Report	100	January 12, 2005		March 14, 2005