



Miller Springs Remediation Management, Inc.

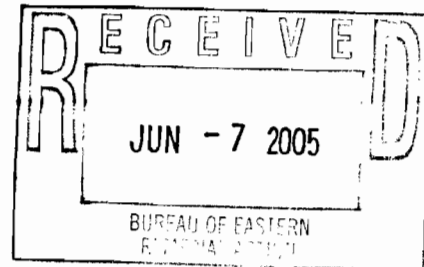
An affiliate of Glenn Springs Holdings, Inc.

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June 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 May 2005.

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

- i) Continue operation and monitoring of the GP-1/GP-3 supplemental treatment system.
- ii) Northrop's GP-3 well resumed pumping on May 5, 2005. Air discharge samples from the GP-1/GP-3 supplemental treatment system were collected by MSRMI on May 10 and 19, 2005 while GP-3 was pumping. The results showed the system is operating satisfactorily.
- iii) Negotiations have concluded between MSRMI and Northrop regarding the purchase for Northrop's M-1 property for the proposed MSRMI control center. Closing and execution of formal agreements will occur in June.
- iv) A Request for Bid for the well installation component of the RA was distributed on May 19, 2005. Bids are due on June 8, 2005.
- v) A Request for Bid for construction of the remaining components of the biosparge remedy was distributed on May 20, 2005. It should be noted that preliminary contacts with various contractors are very discouraging based on both very limited availability and significantly

inflated costs above realistic engineered cost build-ups. MSRMI remains committed to complete the requirements of the ROD, however some construction delays may be encountered given the heavy workload of contractors and the need to pursue reasonable construction cost commitments in the Hicksville area.

- vi) Discussions were held on May 26, 2005 with representatives of Northrop as well as a prospective property purchaser of Northrop's K-2 property (anticipated site for the northern biosparge fence line). Northrop arranged this meeting at the request of MSRMI to facilitate our explanation of the remediation requirements stipulated in the ROD. The perspective purchaser has been provided with historical documents as well as a copy of the recently submitted 100% Design document to facilitate their understanding and also to allow the best "combined" use of the property that is being acquired from Northrop.
- vii) 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. It is noted that Bayer received DEC approval in May to conduct the IRM described in Bayer's Work Plan.
- viii) EPA approval of the 100% Design was received on May 10, 2005 conditional on the inclusion of EPA comments dated May 10, 2005. The 100% Final Design Report was submitted to EPA on May 27, 2005.

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


- i) Awaiting EPA comments on the OU-1 RA Implementation Report submitted on March 18, 2002. EPA indicated verbally in May 2005 that comments would be forthcoming soon.
- ii) Complete property sale with Northrop regarding property acquisition for the Biosparge system control center.
- iii) Complete contractor review/selection process for the first construction phase of the proposed Biosparge remedy.
- 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) 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) Continue operating and monitoring of the GP-1/GP-3 supplemental system.

- 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. Groundwater sampling will be conducted on or about June 27, 2005 and soil 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/6883/171

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 Ruco Property (OU-3)
May 2005

<i>Task and Activity</i>	<i>Percentage of Activity Completed</i>	<i>Start Date</i>	<i>Scheduled Completion Date</i>	<i>Completion Date</i>
• 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
• Grumman 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
• Grumman 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 Predesign 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

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HICKSVILLE, NEW YORK

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May 2005

<i>Task and Activity</i>	<i>Percentage of Activity Completed</i>	<i>Start Date</i>	<i>Scheduled Completion Date</i>	<i>Completion Date</i>
• ROD	100			September 29, 2000
• Unilateral Administrative Order	100			April 26, 2001
• Evaluate VCM presence in GP-3	100			August 15, 2001
• Design Supplemental System for VCM in GP-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 GP-1/GP-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			November 22, 2002
• Install 2 Additional Wells (MW-67/68)	100	December 18, 2002		February 14, 2003
• Sample Wells MW-67 & MW-68				March 25/26, 2003
• Responses to EPA comments on Pre-design Information Report	100	March 6, 2003		March 27, 2003
• EPA Meeting				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		May 27, 2005