



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum Corporation

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April 14, 2010

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

Dear Mr. Taccone:

Re: Quarterly Report – First Quarter 2010 (January through March)
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, respectively, and the USEPA approved 100% Biosparge System Design Report, this submittal provides the Quarterly Progress Report covering January through March 2010. This report covers OU-1, OU-2 and OU-3. Please note that the next Quarterly Progress Report will be submitted by July 15, 2010 and will cover April through June 2010.

Quarterly Progress Report

The following activities were performed in January through March 2010.

Operable Unit-1 (On-site Soil)

All work has been successfully completed. OU-1 is closed.

Operable Unit-2 (Soils Impacted by On-Site Release of PCBs)

All work has been successfully completed. OU-2 is closed.

Operable Unit-3 (Off-site Groundwater)

Supplemental Treatment System

- Operation and monitoring of the GP-1/GP-3 supplemental treatment system continued.
- The carbon bed was changed out on January 26, 2010.
- Evaluations of possible upgrade alternatives for the supplemental treatment system are ongoing.

Biosparge System (see Figures 1 and 2 for system layout)

The biosparge system ceased operation on or about August 24, 2009 due to a failure of the air compressor. The air compressor was restarted on November 9, 2009. Following the restart of the compressor, air injection into the deep wells was problematic. With each attempt to inject air in the deep injection wells, the compressor shut down resulting in an incomplete injection sequence for the deep wells. Tear-down of the compressor identified that the compressor screw and drive needed to be replaced. Repair of the compressor was completed on March 25, 2010 and the compressor resumed full operation on March 29, 2010.

A contingency plan to prevent an extended shutdown period in the future has been implemented. The plan involved the purchase and installation of a second compressor. The second backup compressor that is currently being tested.

A response letter was received from the USEPA on January 25, 2010 to GSHI's submission dated November 30, 2009 which supported that the decrease in VCM concentrations was attributable to biodegradation. The USEPA has agreed that biodegradation was occurring and requested that installation of the north fence begin and the remainder of the middle fence be completed in 2010. A revised schedule was submitted to USEPA on February 3, 2010. USEPA approval of the revised schedule was received on February 23, 2010.

The annual testing of the backflow prevention device located in the biosparge system control building was performed on January 29, 2010. The device passed the inspection. Documentation was submitted to the Hicksville Water District on February 1, 2010.

A request for renewal of acceptance of well installation development and sample collection purge waters to the Cedar Creek WWTP was submitted on March 3, 2010 to the Nassau County Department of Public Works.

In response to Agency requests, information regarding dibenzofuran concentrations in soil (all non-detect except for one low level) was submitted to the USEPA on March 12, 2010.

USEPA response was received March 30, 2010 on the evaluation comparing LFP to PDB/HydraSleeve™ sample results submitted by Langan on February 11, 2010. USEPA requested that a work plan, including a QAPP, for a controlled study be submitted for approval to further evaluate the use of PDB/HydraSleeve™ samplers.

Summary of Biosparge Pilot System

To date, the biosparge system has operated successfully as demonstrated by the following:

- The DO levels in the groundwater are increasing (see attached chemical concentration plot figures)
- The VCM concentrations are decreasing as a result of the microbial biodegradation processes (see attached chemical concentration plot figures)

Planned Second Quarter 2010 Activities

- The following activities are planned for the second quarter of 2010:
 - i. Continue operation and monitoring of the GP-1/GP-3 supplemental system;
 - ii. Complete change out of the supplemental treatment system carbon bed and KM_nO₄ bed (tentatively planned for the week of April 19, 2010); and,
 - iii. Arrange contractors for biosparge system and monitoring well installations.

Mr. Thomas Taccone
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- The following activities are pending an approval by the USEPA:
 - i. Awaiting USEPA review of the draft Declaration of Covenants and Restrictions for the Site, submitted on April 20, 2006 by Bayer

Should you have any questions on the above, please do not hesitate to contact me at (972) 687-7511 or e-mail at jeffrey_kogut@oxy.com.

Sincerely yours,

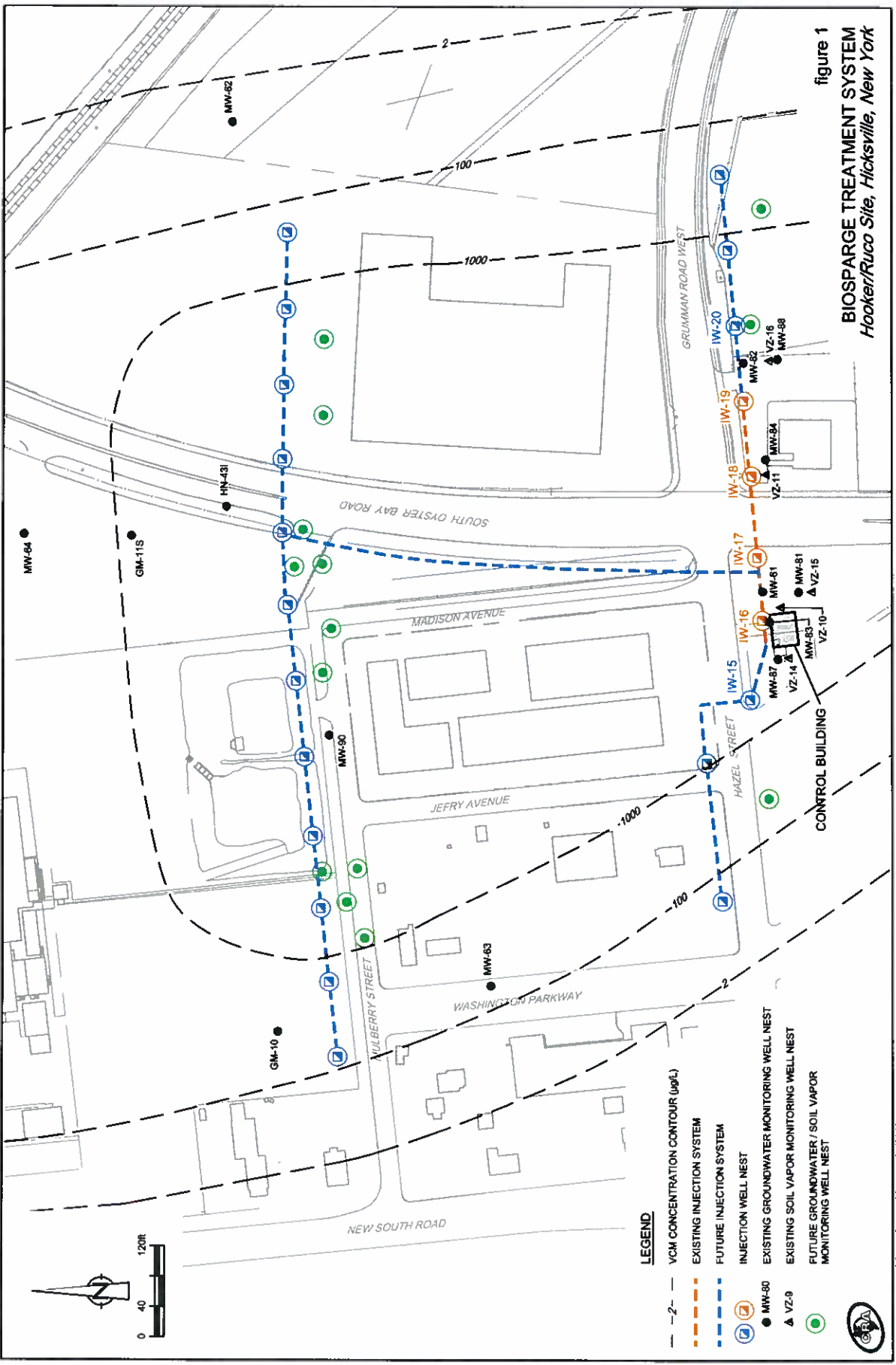


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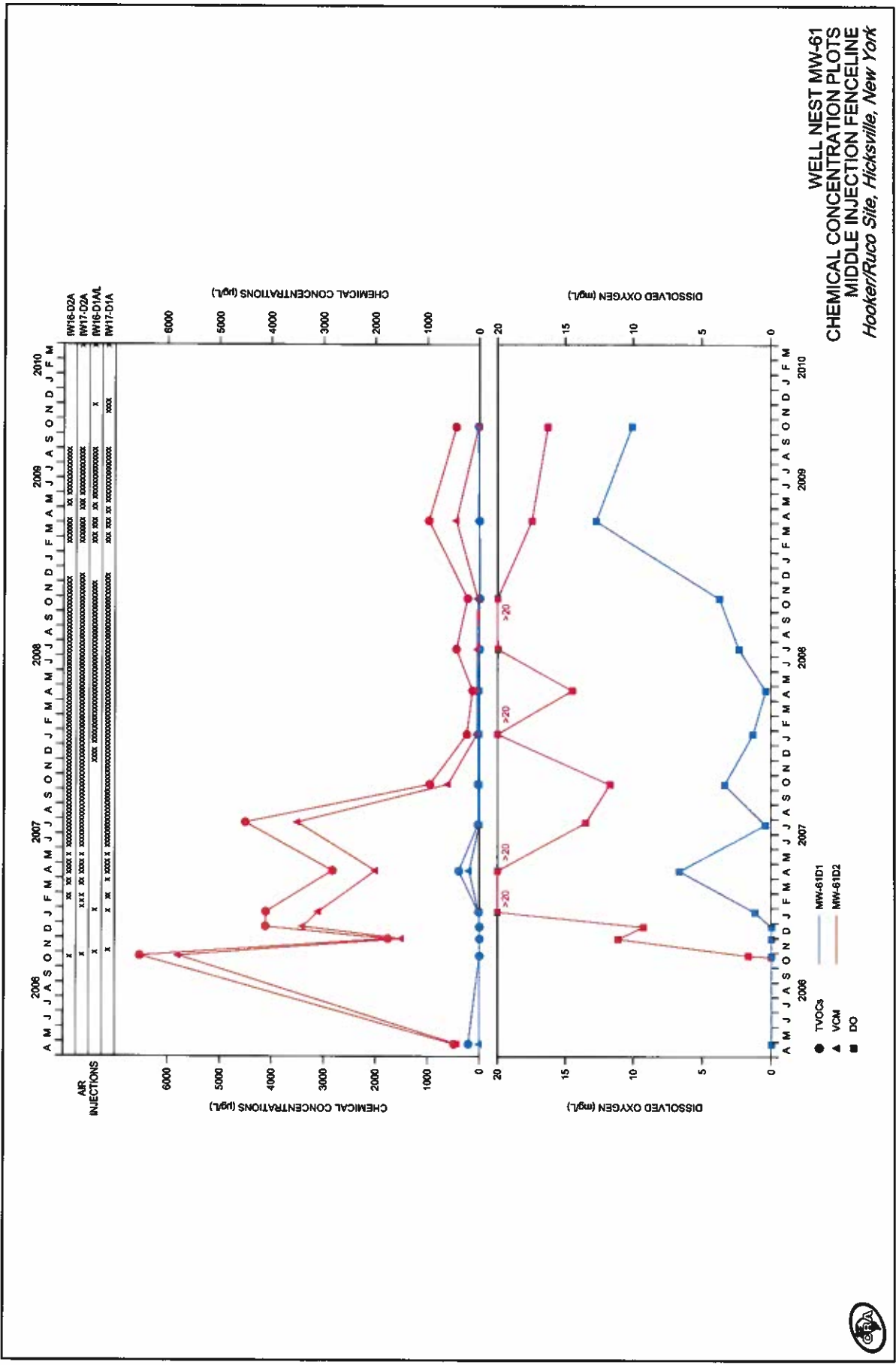
Enclosures

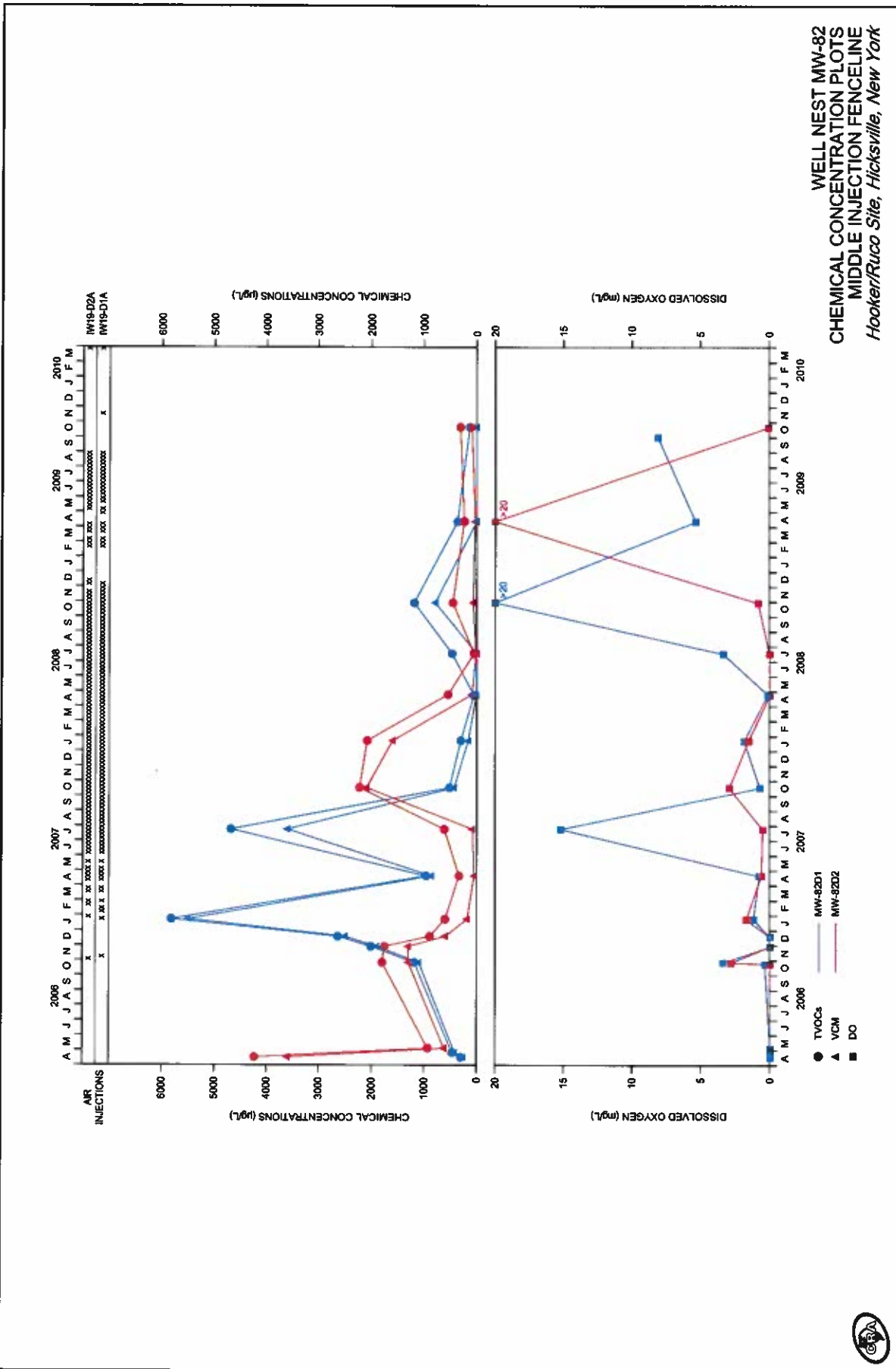
cc: K. Lynch (USEPA)
M. E. Wieder (USEPA)
S. Scharf (NYSDEC – pdf on CD)
M. Popper (CDM)
T. Kelly (Nassau County)
W. Baldwin (Bayer)
J. Kay (CRA)

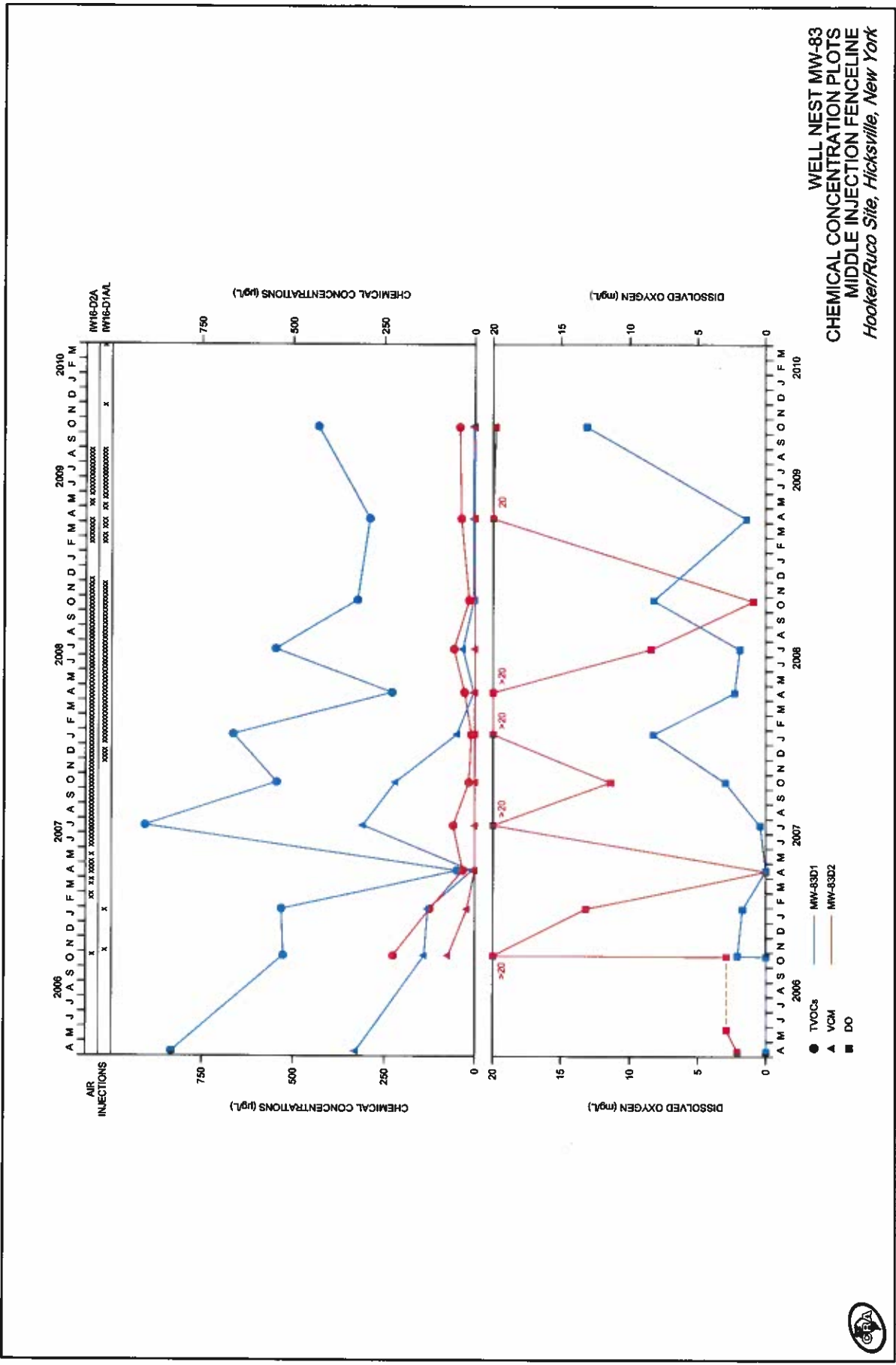
figure 1
BIOSPARGE TREATMENT SYSTEM
Hooker/Ruco Site, Hicksville, New York

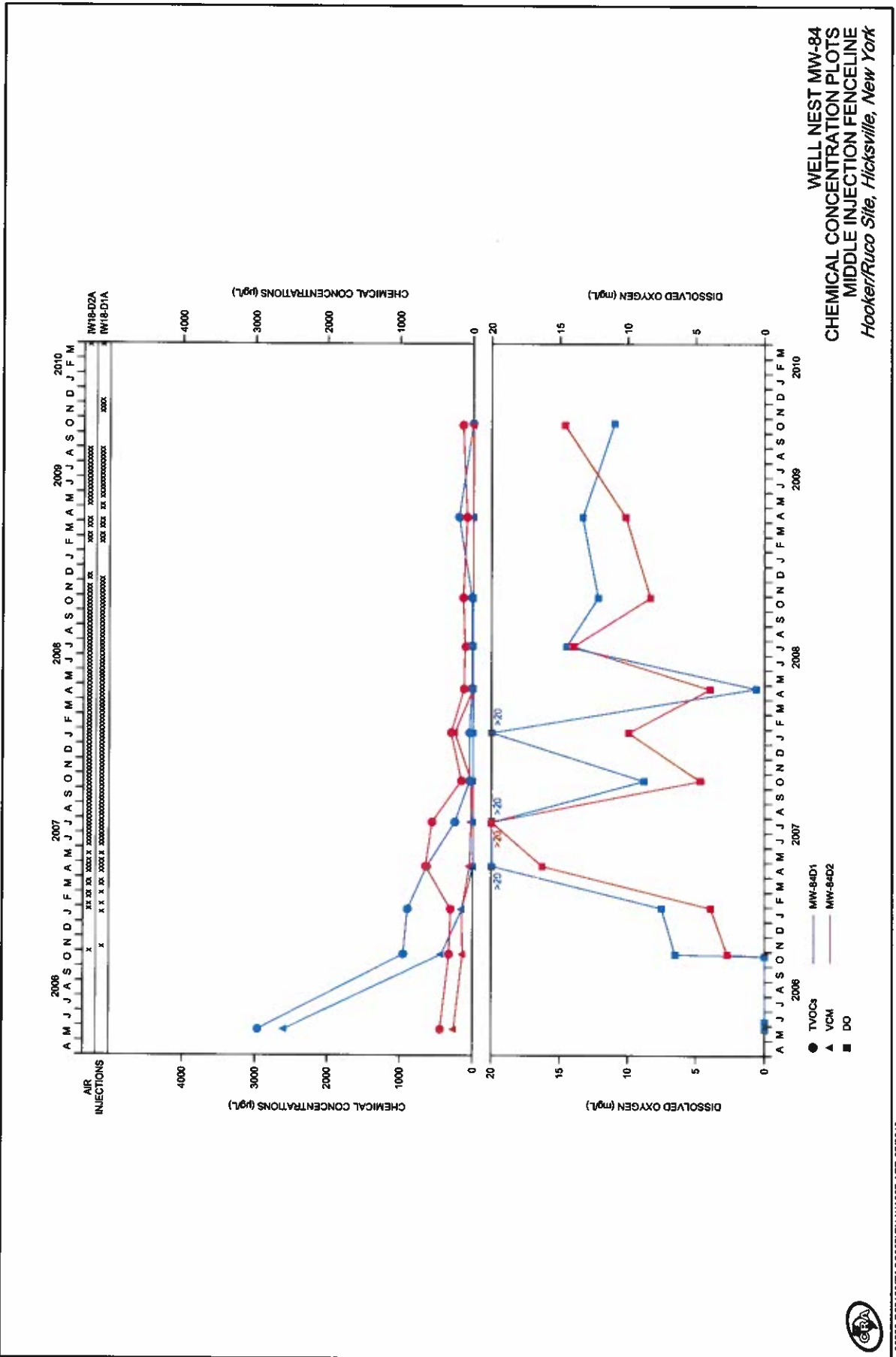


- LEGEND**
- - - 2 - - VCM CONCENTRATION CONTOUR (µg/L)
 - - - - - EXISTING INJECTION SYSTEM
 - - - - - FUTURE INJECTION SYSTEM
 - INJECTION WELL NEST
 - MW-80 EXISTING GROUNDWATER MONITORING WELL NEST
 - ▲ VZ-9 EXISTING SOIL VAPOR MONITORING WELL NEST
 - GM-10 FUTURE GROUNDWATER / SOIL VAPOR MONITORING WELL NEST

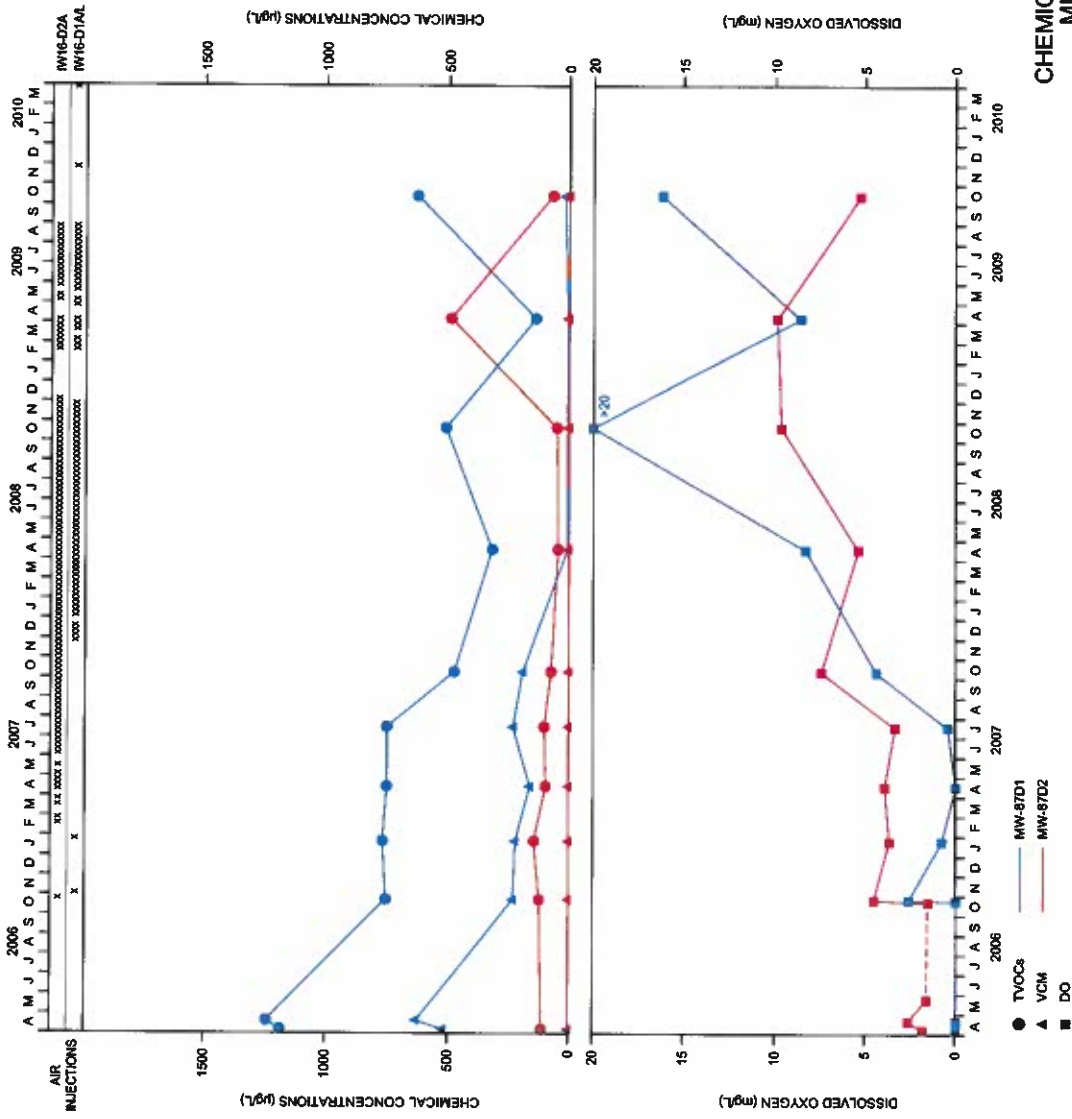








WELL NEST MW-87
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



WELL NEST MW-88
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York

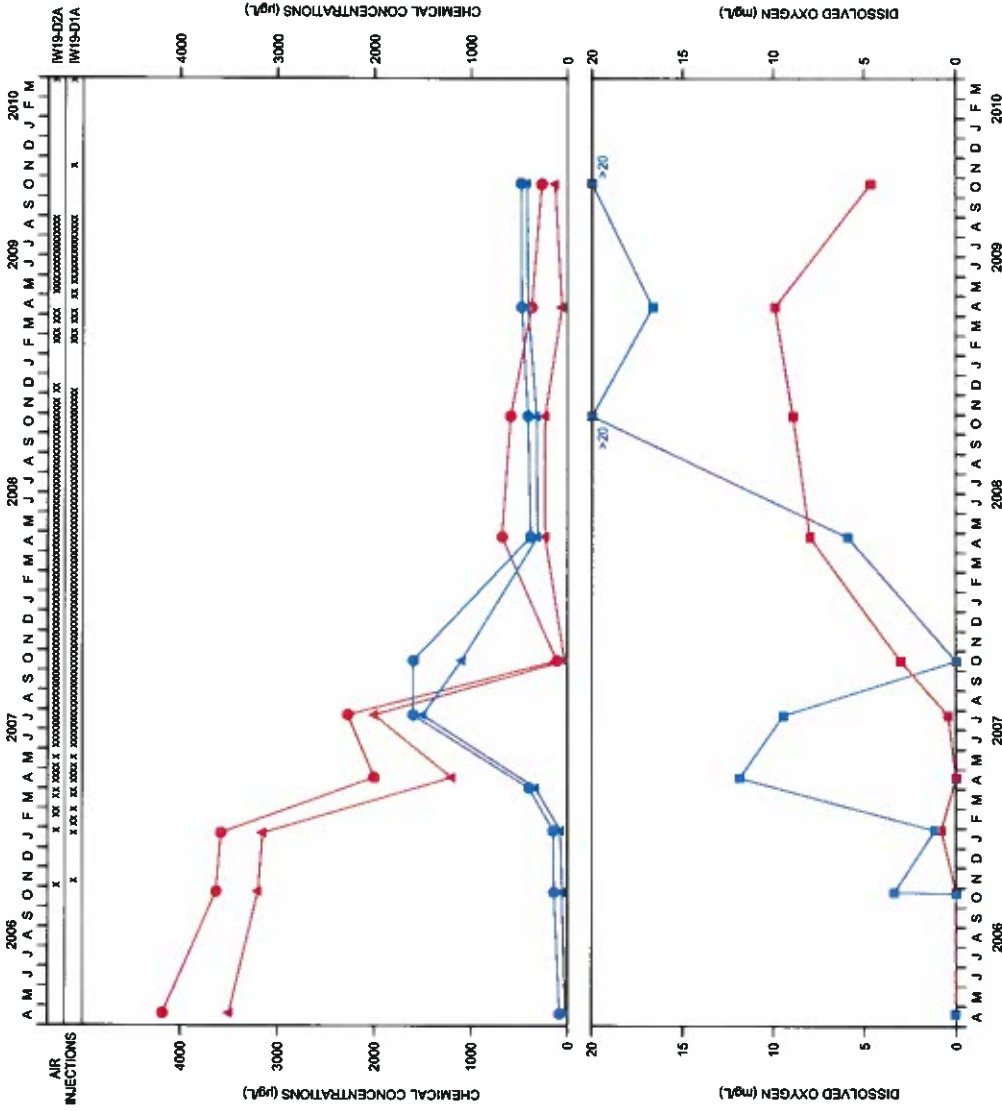


TABLE 1

GLENN SPRINGS HOLDINGS INC.
HOOKER/RUCO SITE
HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3)

January through March 2010

<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

TABLE 1
GLENN SPRINGS HOLDINGS INC.
HOOVER/RUCO SITE
HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3)

January through March 2010

<i>Task and Activity</i>	<i>Percentage of Activity Completed</i>	<i>Start Date</i>	<i>Scheduled Completion Date</i>	<i>Completion Date</i>
• 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
• 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 4, 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
• Property Purchased	100			June 2005
• 100% Design Approved	100			July 7, 2005
• Obtain Building Permits	100	July 11, 2005		November 10, 2005

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January through March 2010

<i>Task and Activity</i>	<i>Percentage of Activity Completed</i>	<i>Start Date</i>	<i>Scheduled Completion Date</i>	<i>Completion Date</i>
• Arrange Contractors	100	January 2005		July 22, 2005
• Well Installation	100	September 13, 2005		April 28, 2006
• Biosparge System Installation	100	November 2005		May 2006
• Closure of On-Site and Off-Site Wells	100	November 2005		May 10, 2006
• OU-1 Soil Borings	100	November 2005		January 11, 2006
• Background Groundwater Sampling	100	March 27, 2006		June 14, 2006
• Pre-Start Sampling	100			October 24, 25, and 26, 2006
• Final Inspection	100			October 27, 2006
• Biosparge System Start-Up	100			October 27, 2006
• First Monthly Sampling	100			November 28 to 30, 2006
• Second Monthly Sampling	100			December 20 and 21, 2006
• Noise Survey	100			January 18, 2007
• 2007 First Quarterly Sampling	100			January 23 to 30, 2007
• Submission of Phase I Construction Documents	100			February 1, 2007
• 2007 Second Quarterly Sampling	100			April 18 to 27, 2007
• 2007 Third Quarterly Sampling	100			July 16 to 27, 2007
• 2007 Fourth Quarterly Sampling	100			October 8 to 18, 2007
• Evaluation/Recommendation for Design Modifications	100			January 15, 2008
• 2008 First Quarterly Sampling	100			January 22 to 28, 2008
• 2008 Second Quarterly Sampling	100			April 16 to 25, 2008
• 2008 Third Quarterly Sampling	100			July 15 to 18, 2008
• 2008 Fourth Quarterly Sampling	100			October 21 to 30, 2008
• Construction of North Fence Underground Components	100			December 23, 2008
• 2009 First Semi-Annual Sampling	100			April 7 to 14, 2009
• Response to USEPA Biosparge System Comments	100	August 27, 2009		September 23, 2009
• 2009 Second Semi-Annual Sampling	100			October 13 to 21, 2009
• Submittal of Biodegradation Supporting Information	100			November 30, 2009
• Submittal of Revised Schedule	100			February 3, 2010
• Submittal of PDB/HydraSleeve™ Evaluation	100			February 11, 2010
• Trailing Edge Proposal	100			March 15, 2010