



Glenn Springs Holdings, Inc.

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October 12, 2011

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

Re: Quarterly Report – Third Quarter 2011 (July through September)
Administrative Orders Hooker Chemical/Ruco Polymer Corporation Site
Index Nos. II-CERCLA-80216, II-CERCLA-94-0210 and II-CERCLA-02-2001-2018

Dear Mr. Taccone:

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 July through September 2011 for the Hooker/Ruco Site. This report covers OU-1, OU-2, and OU-3. Please note that the next Quarterly Progress Report will be submitted by January 15, 2012 and will cover October through December 2011.

Quarterly Progress Report

The following activities were performed in July through September 2011.

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 air treatment system continued.
- The carbon bed was changed out on August 4, 2011.
- Evaluations of possible upgrade alternatives for the supplemental treatment system are ongoing.

Biosparge System (see Figures 1 and 2 for system layout and Figures 3 and 4 for system cross-sections).

Bids for the remaining components of the biosparge system were received on June 17, 2011 and are being evaluated by GSHI. A surveyor will be retained when installation of the biosparge system expansion is completed, and will survey the system including the associated monitoring wells.

The evaluation comparing the passive diffusion bag/HydraSleeve™ (PDB) sample results to the low-flow purging (LFP) sample results for the 2011 semi-annual biosparge performance monitoring event was submitted on August 31, 2011. USEPA concurrence to use PDB samplers for future groundwater sampling events was received by letter on September 22, 2011. Implementation will begin with the October 2011 sampling event.

The USEPA letter dated September 22, 2011 requested that an updated QAPP consistent with the USEPA's UFP format be submitted by October 24, 2011. The QAPP is being prepared.

Summary of Biosparge Pilot System

The dissolved oxygen (DO), total volatile organic compounds (TVOCs), and vinyl chloride monomer (VCM) concentration trends for the various groundwater monitoring wells are shown on Figures 5 through 11.

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

- i. DO levels in the groundwater have increased and, in general, are greater than the target concentration of 2 milligrams per liter (mg/L).
- ii. The VCM concentrations are decreasing as a result of the microbial biodegradation processes.

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Planned Fourth Quarter 2011 Activities

The following activities are planned for the fourth quarter of 2011:

- i. Continue operation and monitoring of the GP-1/GP-3 supplemental air treatment system.
- ii. Change-out of the supplemental treatment system carbon bed is tentatively planned for the week of October 24, 2011.
- iii. Complete and submit an updated QAPP consistent with the USEPA's UFP format by October 24, 2011.
- iv. Selection of a contractor and installation of the vaults, piping, conduit, etc. for the remainder of the biosparge system middle fence and the north fence.
- v. Performance of the semi-annual performance monitoring event of the biosparge system.

The following activities are pending an approval or review by the USEPA. The follow-up schedule is based on receipt of the review or approval:

- i. No activities for this quarter.

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,



Jeffrey A. Kogut

Encl.

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

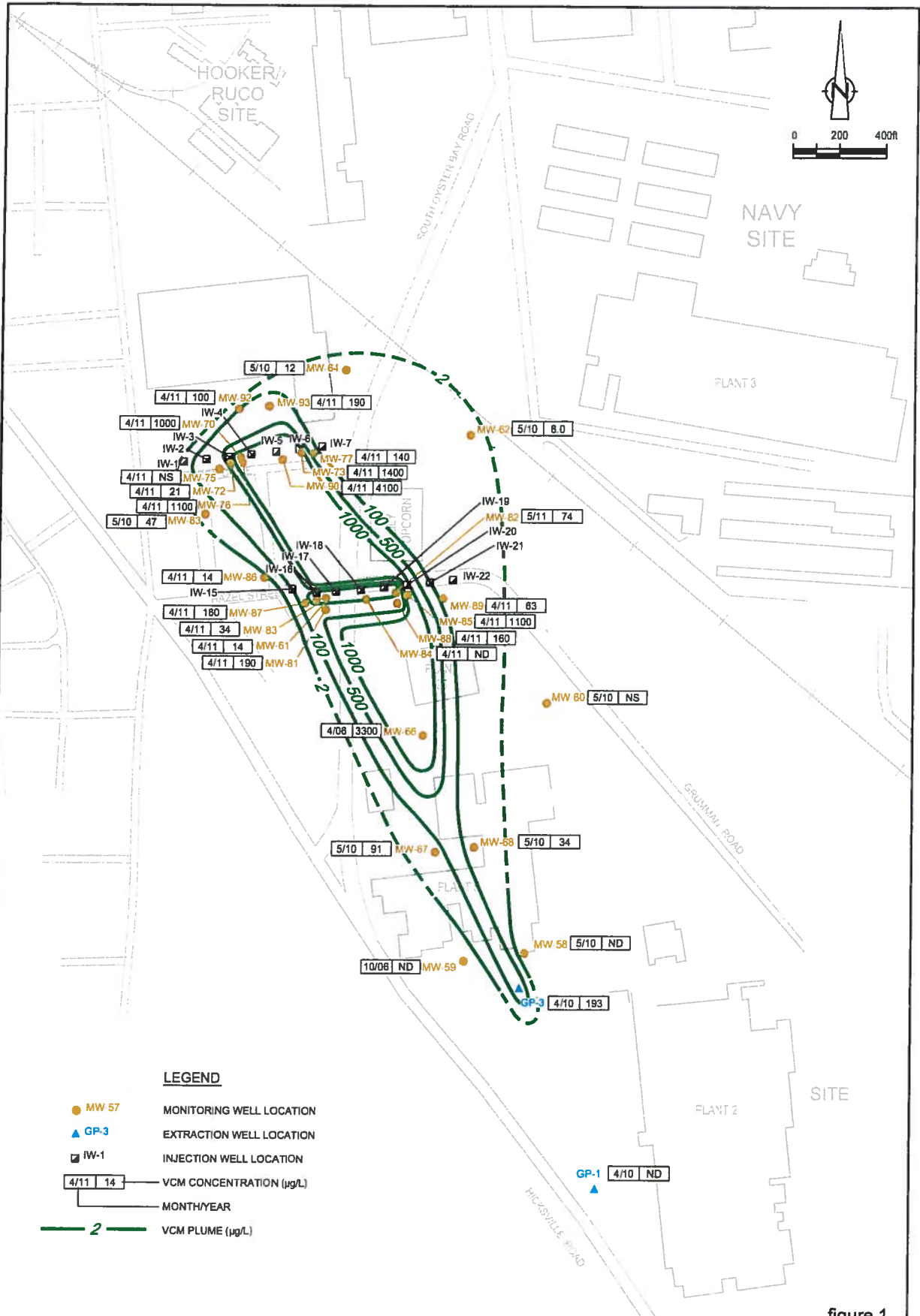


figure 1
MOST RECENT VCM GROUNDWATER CONCENTRATIONS
Hooker/Ruco Site, Hicksville, New York



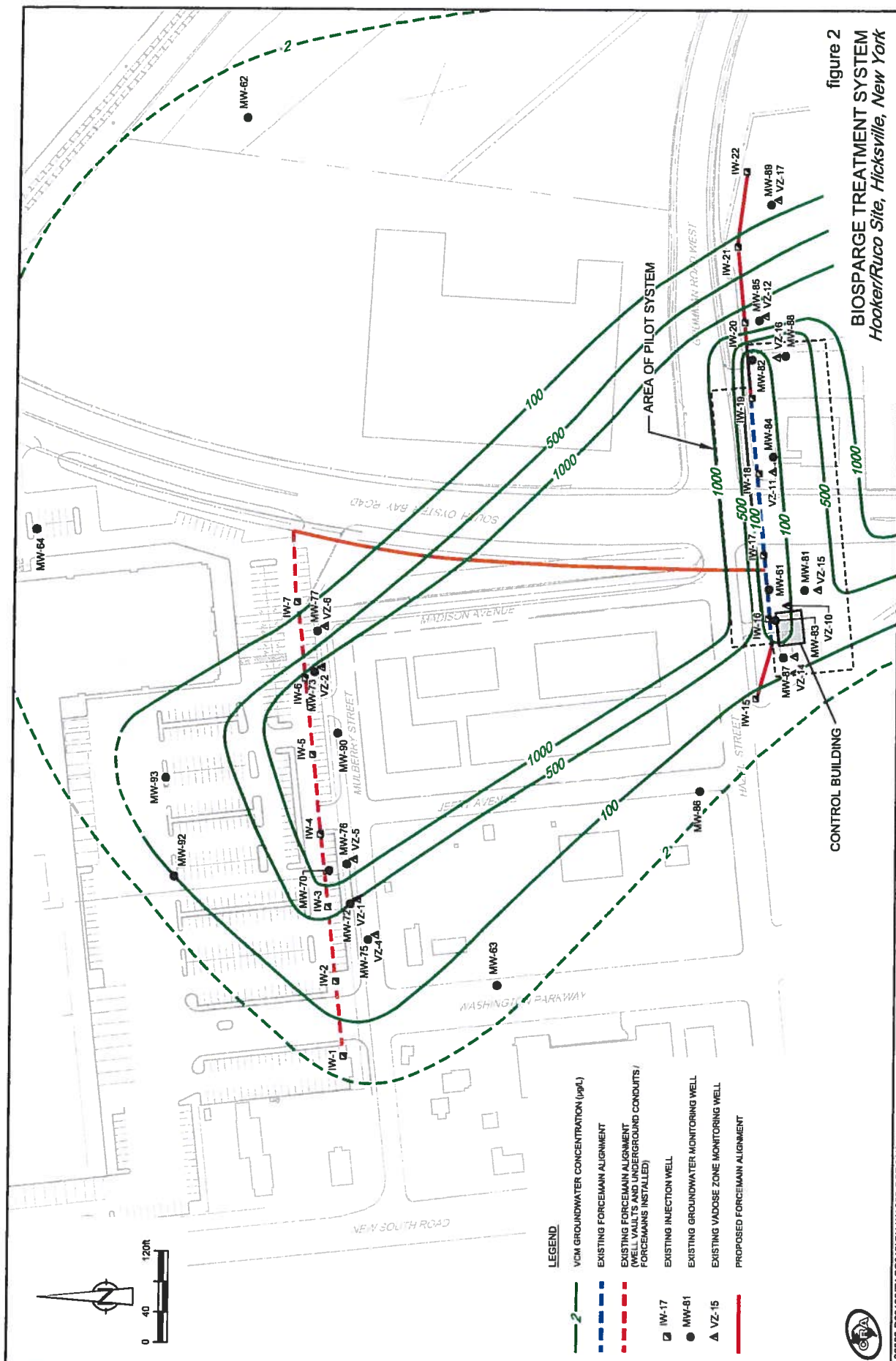


figure 2
 BIOSPARGE TREATMENT SYSTEM
 Hooker/Ruco Site, Hicksville, New York

- LEGEND**
- 2 — VCM GROUNDWATER CONCENTRATION (µg/L)
 - — — EXISTING FORCEMAIN ALIGNMENT
 - — — EXISTING FORCEMAIN ALIGNMENT (WELL VAULTS AND UNDERGROUND CONDUITS / FORCEMAINS INSTALLED)
 - IW-17 EXISTING INJECTION WELL
 - MW-81 EXISTING GROUNDWATER MONITORING WELL
 - ▲ VZ-15 EXISTING VADOSE ZONE MONITORING WELL
 - — — PROPOSED FORCEMAIN ALIGNMENT



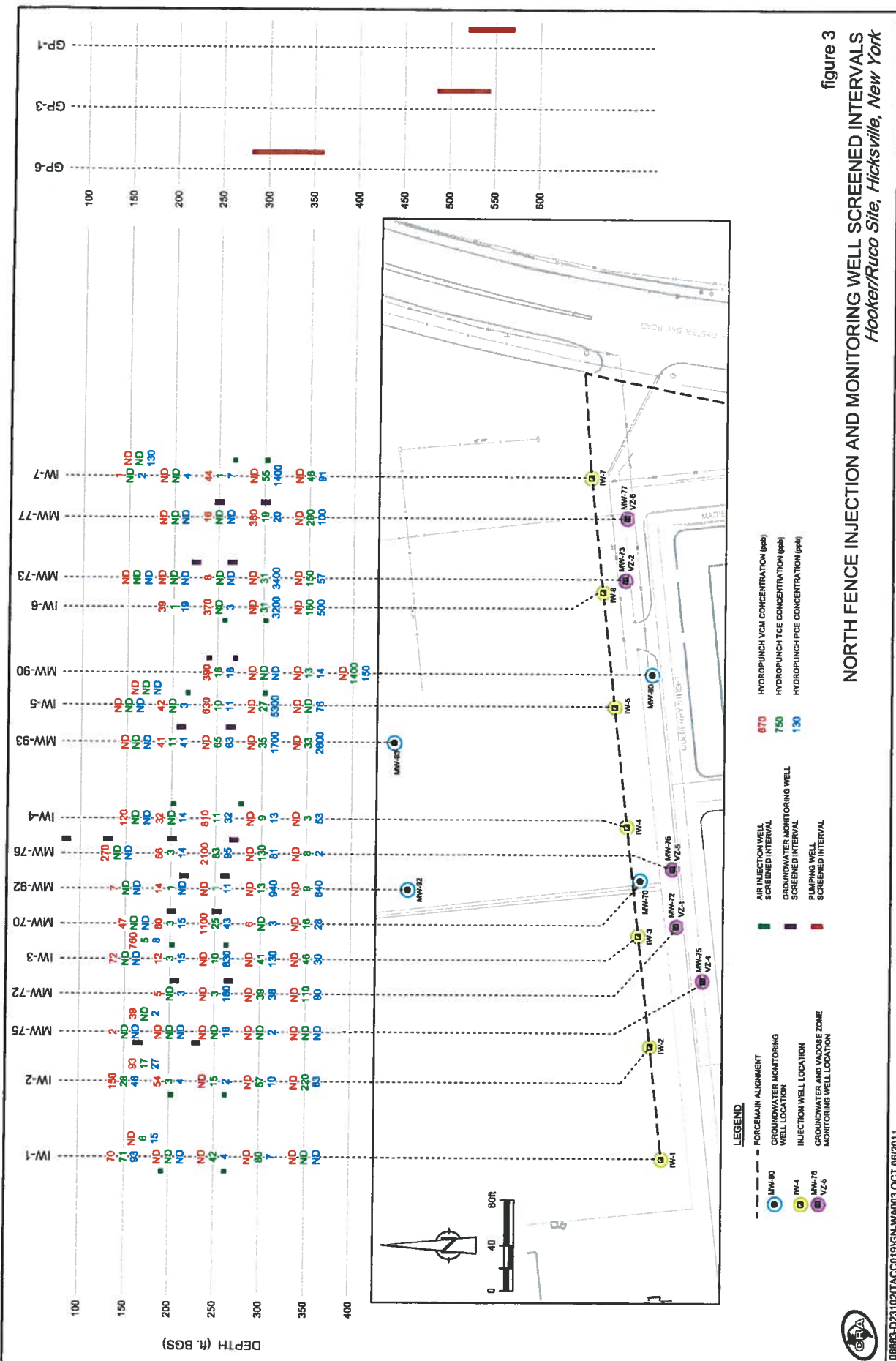


figure 3

NORTH FENCE INJECTION AND MONITORING WELL SCREENED INTERVALS
Hooker/Ruco Site, Hicksville, New York



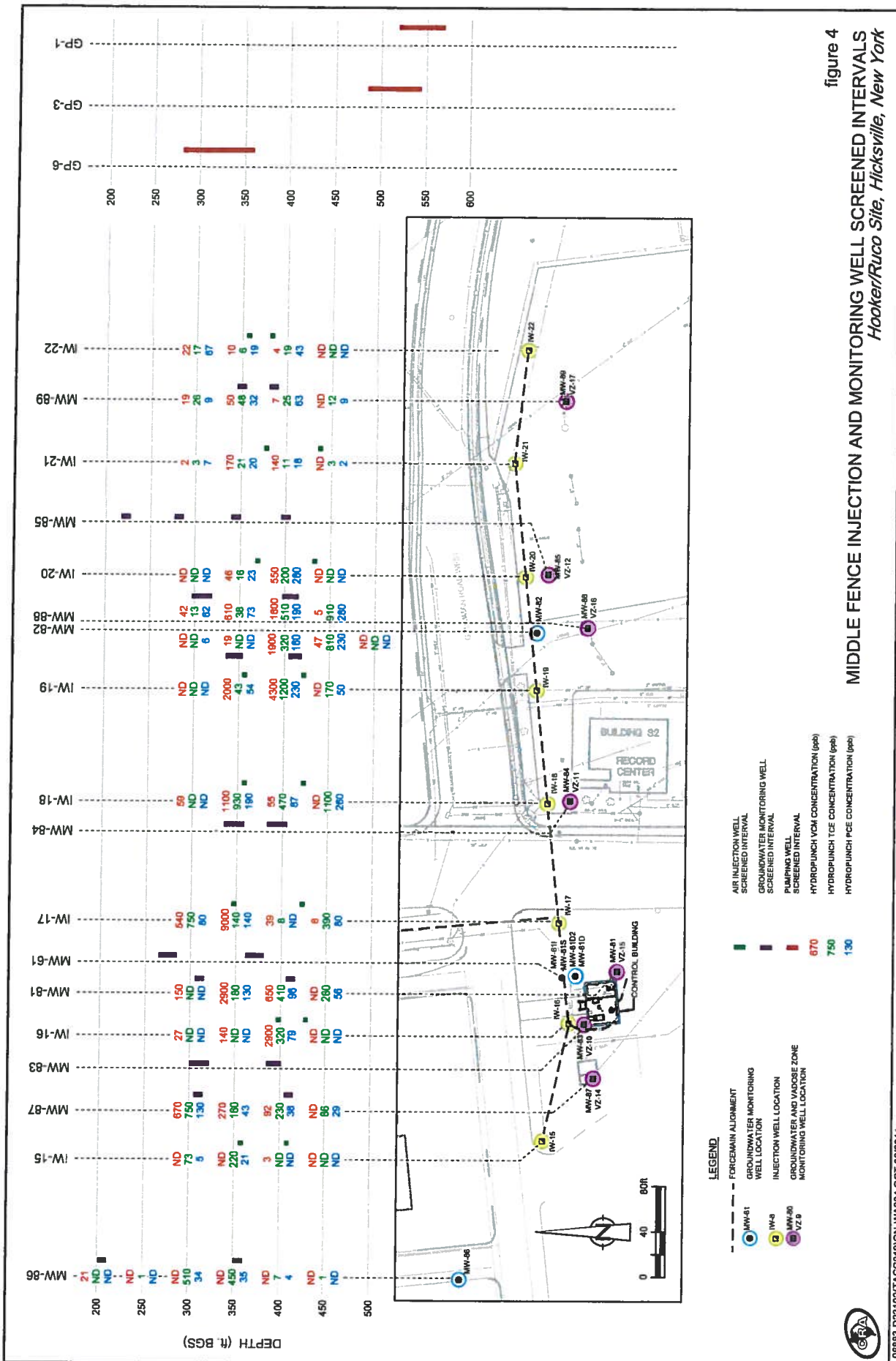
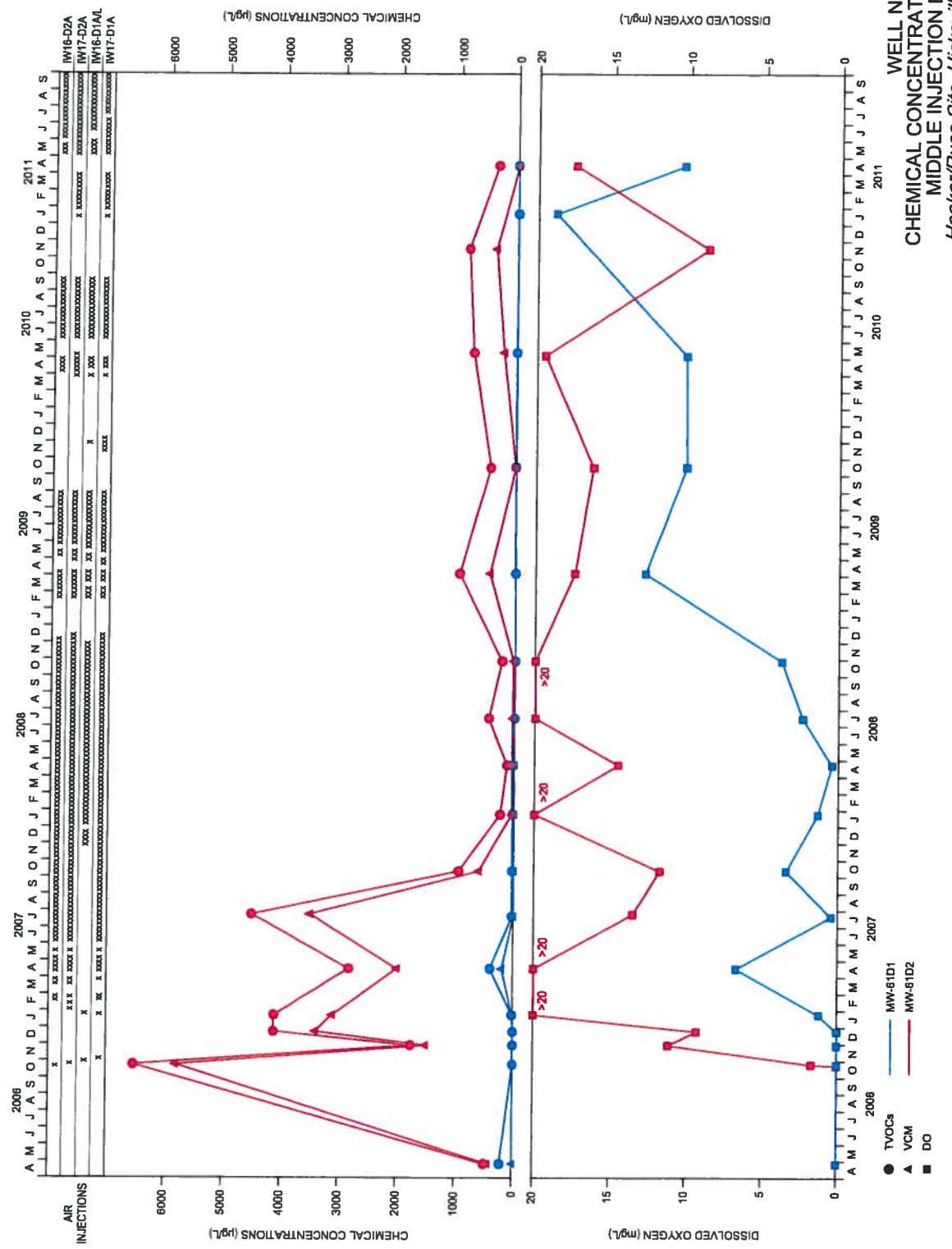


figure 4
MIDDLE FENCE INJECTION AND MONITORING WELL SCREENED INTERVALS
Hooker/Ruco Site, Hicksville, New York





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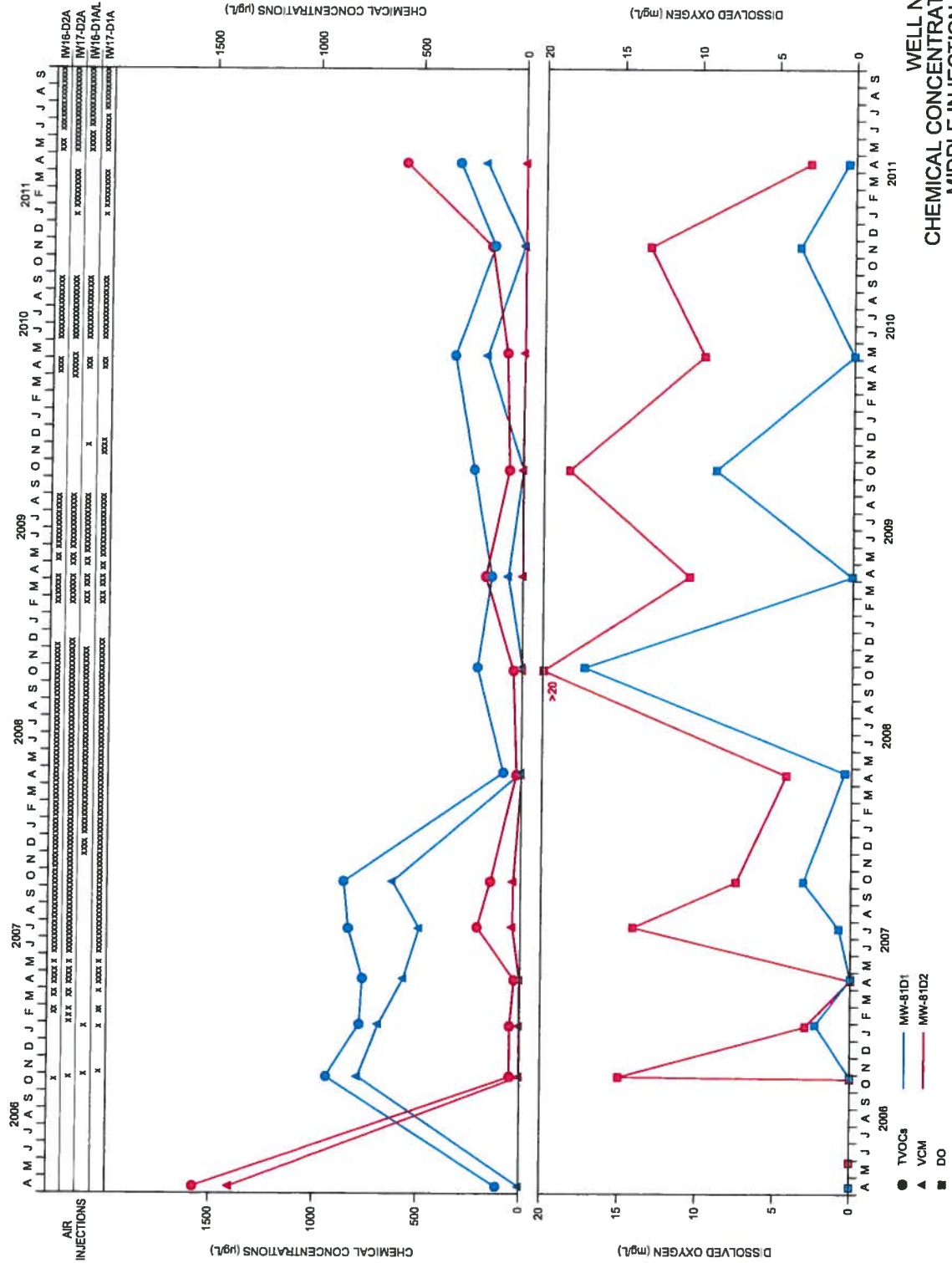


figure 6
 WELL NEST MW-81
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



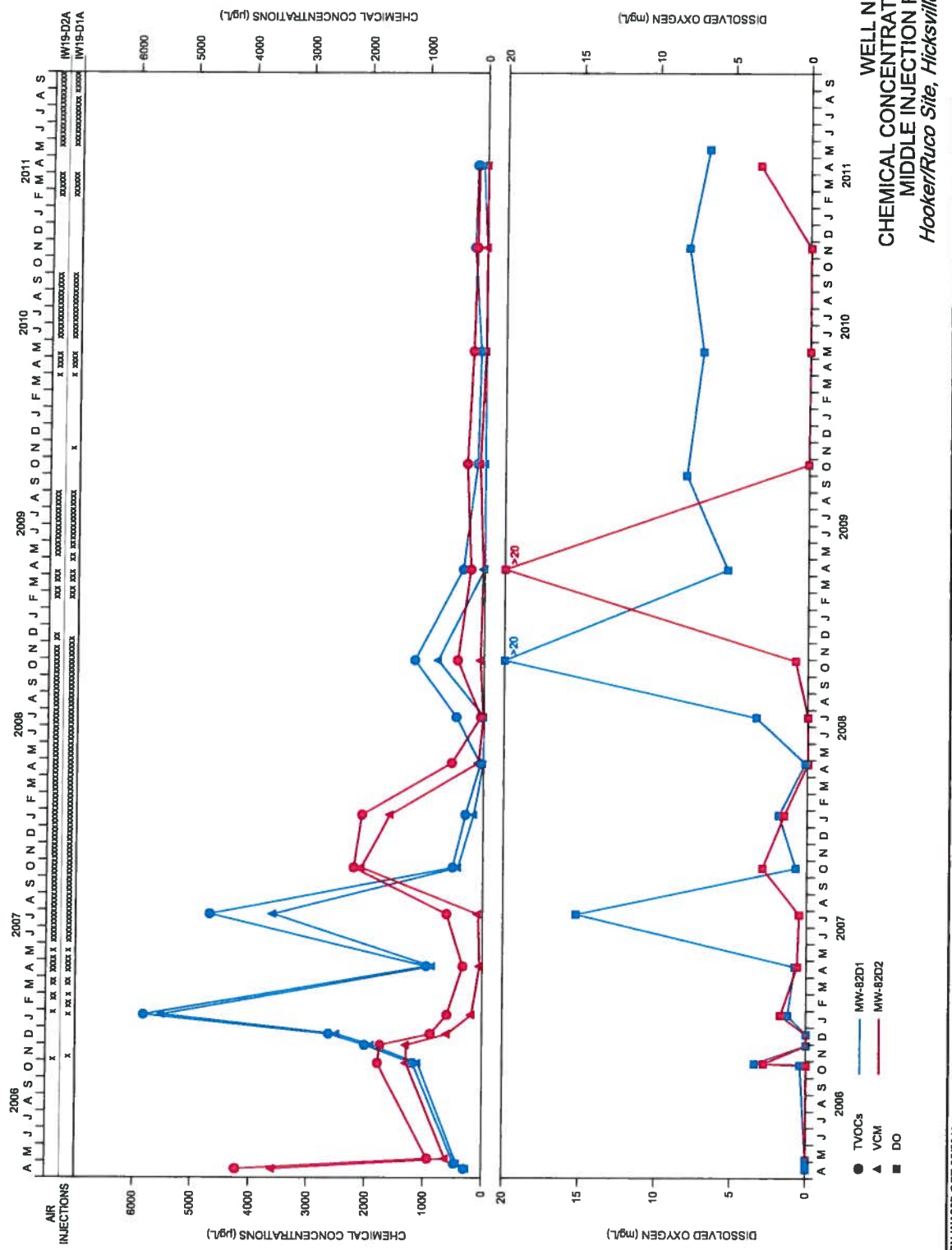


figure 7
 WELL NEST MW-82
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



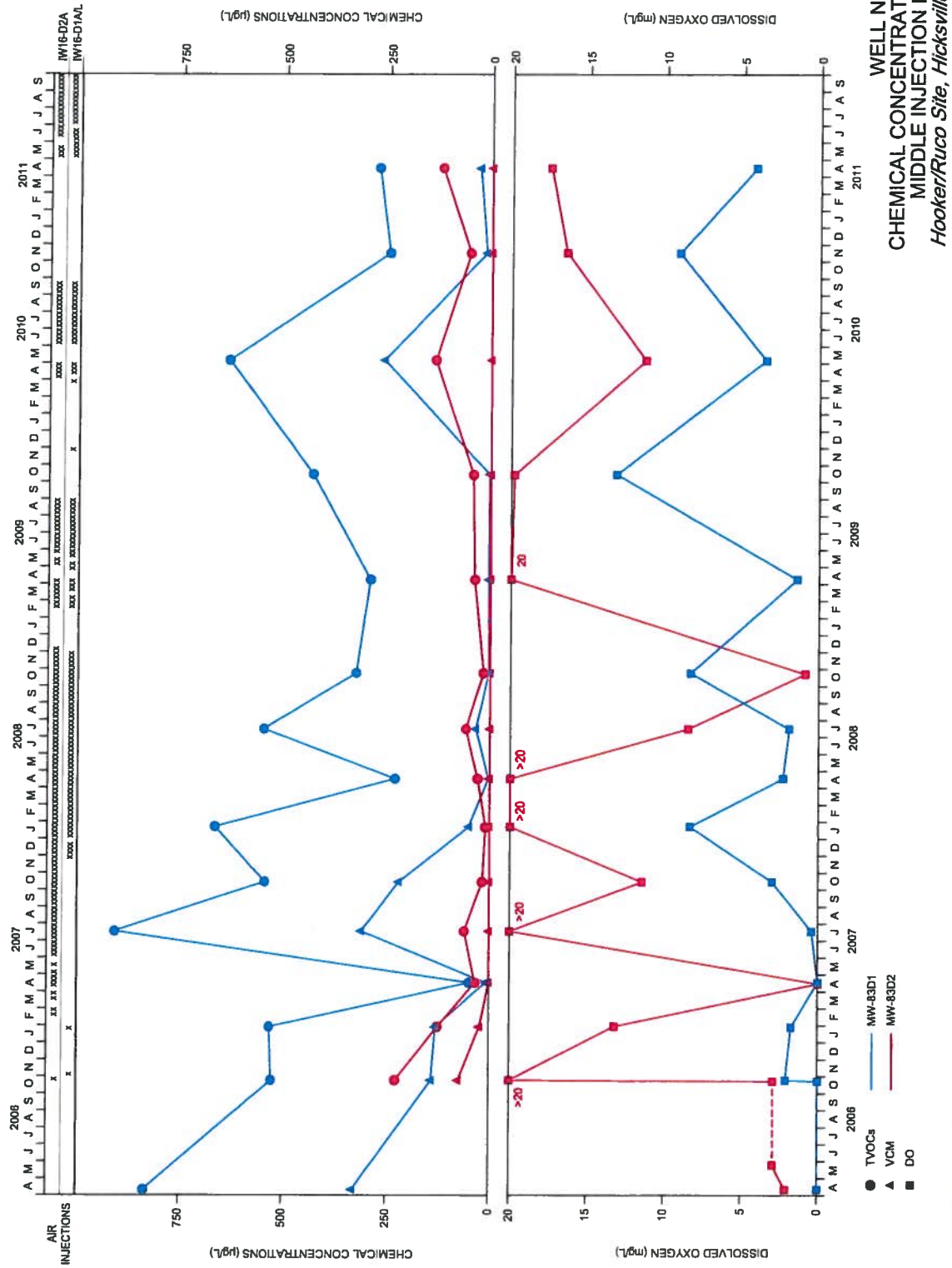


figure 8
 WELL NEST MW-83
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York

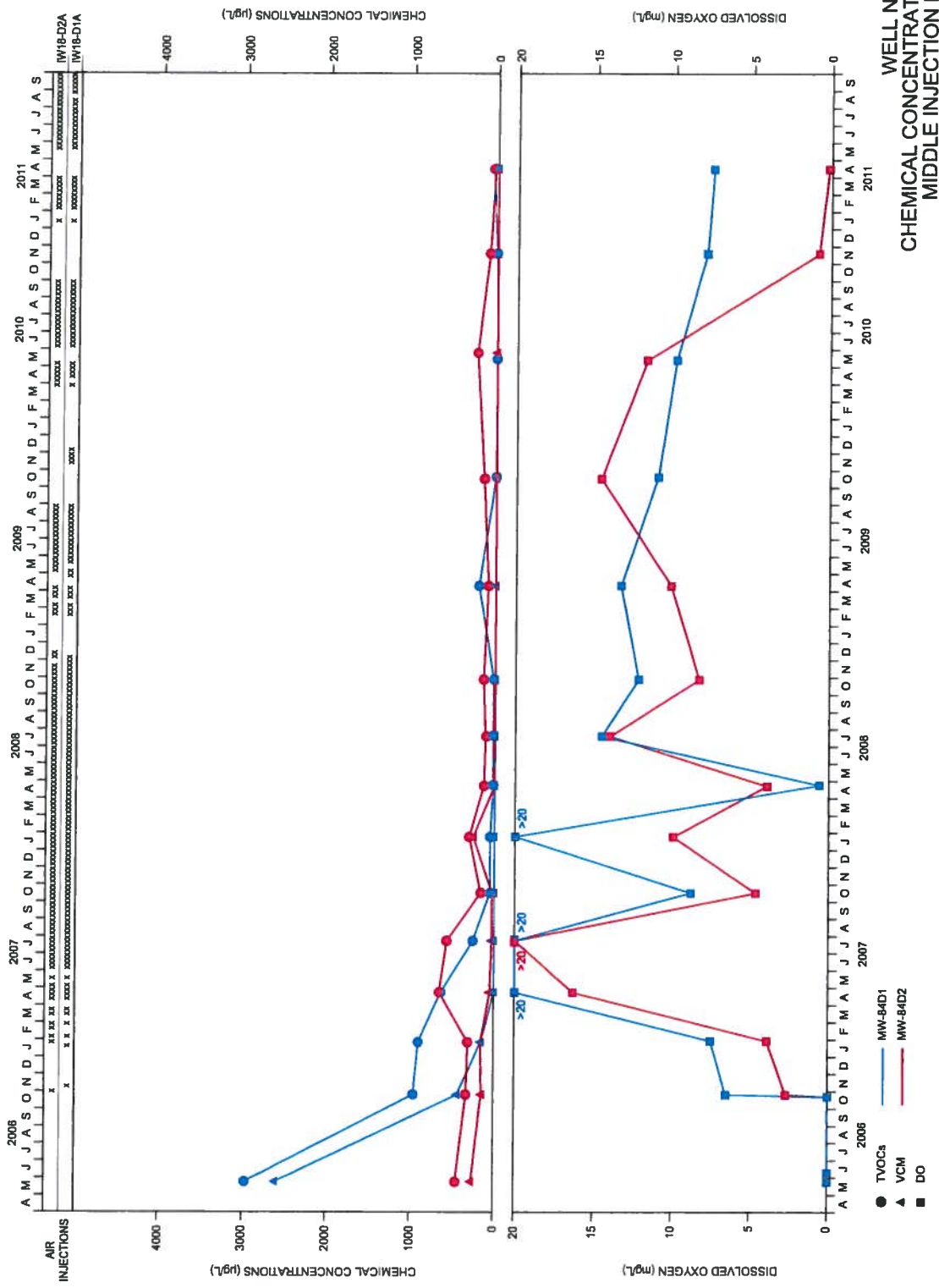


figure 9
 WELL NEST MW-84
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



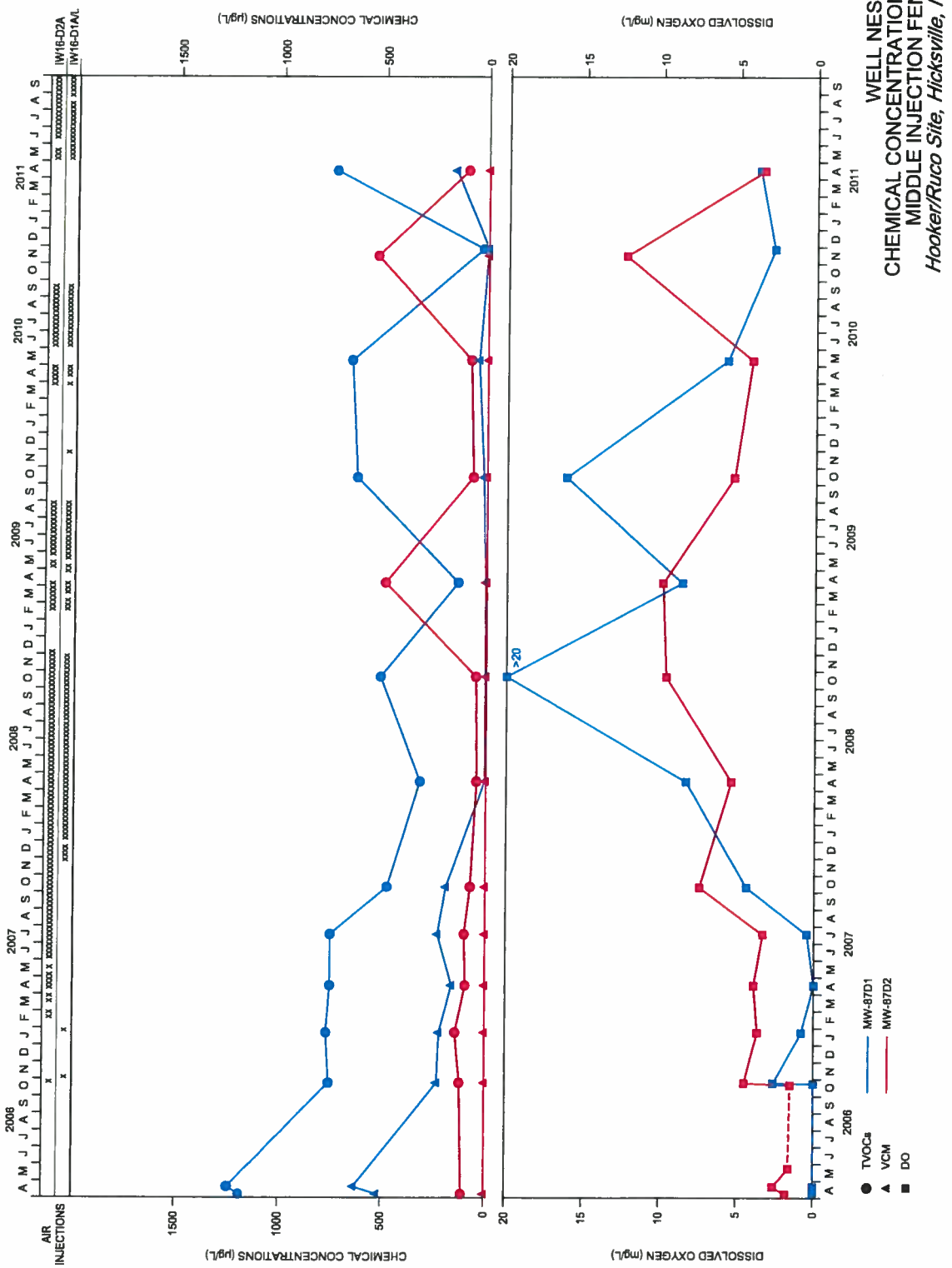


figure 10
 WELL NEST MW-87
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



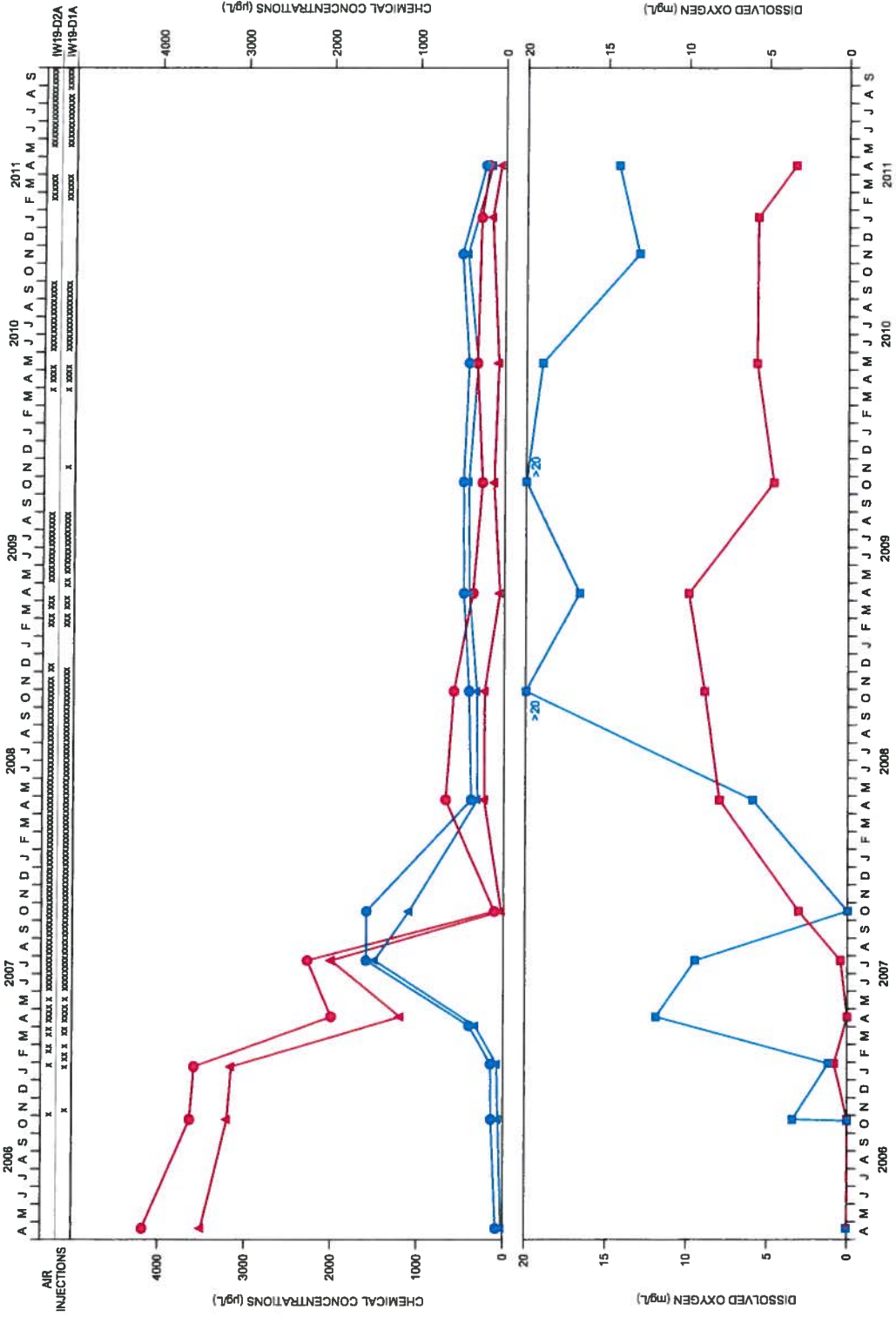


figure 11
 WELL NEST MW-88
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York

