Miller Springs Remediation Management, Inc.

		, III.
Stephen Whyte	NOV 2 1 2003	2480 Fortune Drive, Suite 300
Vice President, Operations Direct Dial (859) 543-2151		Lexington, KY 40509 Facsimile (859) 543-2171
	BUREAU OF EASTERN REMEDIAL ACTION	November 10, 2003

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

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File on eD(DCs? _/	Yes No
Site Name Site # <u>1-3</u>	100100 N 30 - 004	<u>uco</u>
County N	135AU	
Town 0,51	Yes	No
Please Wri	te The eDO	
Name Desc	ription 11	<u>S noningegor</u>

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, attached please find the progress report for the month of October 2003.

In summary, the following activities were performed in October 2003:

- i) Finalized and submitted the "Pre-Final (95%) Remedial Design Report" to the USEPA on October 31, 2003.
- ii) The possibility of using Northrop's GP-1/GP-3 pumping and treatment system in combination with the biosparge remedy to address the VCM subplume was further discussed with Northrop during meetings held on July 29 and October 2, 2003 with mutually acceptable results. It is planned to use a pump and treat remedy for the south portion of the VCM subplume and the biosparge remedy for the north and middle portions of the VCM subplume. Additional discussions are planned.
- Operation and monitoring of the selected supplemental system (add-on vapor phase GAC) for the Northrop GP-1/GP-3 extraction system, which was started up on July 9, 2003, continued. Based on the monitoring results, the Supplemental System polishing bed was modified on September 24/25, 2003 from 10,000 pounds of vapor phase granular activated carbon to 20,000 pounds of potassium permanganate. To date, the system has been operating effectively.

In summary, the following activities are planned for November 2003:

- i) Awaiting EPA comments on the OU-1 RA Implementation Report submitted on March 18, 2002.
- ii) Awaiting EPA comments on the Pre-Final (95%) Remedial Design of the proposed biosparge remedy submitted on October 31, 2003.
- iii) Continue operation and monitoring of the supplemental treatment system. Awaiting input from Northrop on the O&M Manual.

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,

James Ky for

Steve Whyte Project Manager

JKK/cb/6883/139 Encl.

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

PROGRESS REPORT HOOKER/RUCO SITE HICKSVILLE, NEW YORK

Reporting Period: October 2003

1. Progress Made This Reporting Period

• Finalized and submitted the "Pre-Final (95%) Remedial Design Report" to the USEPA on October 31, 2003.

• The possibility of using Northrop's GP-1/GP-3 pumping and treatment system in combination with the biosparge remedy to address the VCM subplume was further discussed with Northrop during meetings held on July 29 and October 2, 2003 with mutually acceptable results. It is planned to use a pump and treat remedy (i.e., GP-3 and treatment of the groundwater either by carbon, oxidation, or an equivalent technology) for the southern portion of the VCM subplume and the biosparge remedy for the northern and middle portions of the VCM subplume. It is planned to continue the evaluation of the use of Northrop's GP-1/GP-3 system.

Operation and monitoring of the Supplemental System, which started up on July 9, 2003, continued with occasional cessation of groundwater pumping necessary to change out carbon, and/or attempt to improve the operation of the carbon system. Based on the monitoring results, it was determined that modifying the supplemental system polishing bed from 10,000 pounds of vapor phase granular activated carbon to 20,000 pounds of potassium permanganate would provide better treatment of discharge from Northrop's treatment system. This modification was performed on September 24/25, 2003. To date, the system has been operating effectively.

2. Upcoming Events - November 2003

- Awaiting EPA comments on OU-1 RA Implementation Report submitted on March 18, 2002.
- Awaiting EPA comments on the "Pre-Final (95%) Remedial Design Report" for the proposed biosparge remedy which was submitted on October 31, 2003.
- Continue operation and monitoring of the GP-1/GP-3 Supplemental Treatment System. Awaiting input from Northrop on the Supplemental System O&M Manual submitted on August 16, 2002.

TABLE 1

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

Operable Unit - 1 September 2003

	Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
•	Draft Remedial Design Work Plan	100	May 16, 1994		September 20, 1994
•	Remedial Design Work Plan-Revision 1	100			October 31, 1995
•	Revised Pages Regarding KGD Method	100			February 23, 1996
•	New Supervising Contractor	100	December 20, 1995		December 20, 1995
•	Evaluation of Alternate Groundwater Treatment Systems	100			January 25, 1996
•	Predesign Work Plan Preparation (PDWP)	100			September 30, 1996
•	Documentation Requirements for G&M Model	100	•		August 1, 1996
•	Supporting Documentation for the inclusion of in situ remediation evaluation	100			August 9, 1996
•	Predesign Work Plan - Revision 1				
	 Report Preparation Address December 9 comments 	100 100	October 9, 1998 December 9, 1998		November 2, 1998 January 20, 1999
	- Field Activities	100	December 9, 1998		January 10, 1999
•	Predesign Work Plan - Revision 2			· · · · · · · · · · · ·	January 20, 1999
•	Groundwater Treatability Study (Groundwater treatability study on hold. December 1998 and January 1999 analytical results showed TIC concentrations in sample collected for treatability study were too low to perform meaningful study.)	10			NA
	Predesign Investigation Report	100			April 26, 1999
	OU-1 Soils Proposed Remedy	100			August 12, 1999
•	Responses to EPA Comments on OU-1 Soils Proposed Remedy	100	October 25, 1999		November 16, 1999
•	Work Plan for Sump 1 Tank Removal	100	May 31, 2000		June 15, 2000
•	Work Plan for Infiltration Tile in Sump 1	100	August 15, 2000		September 8, 2000
•	Removal of Sump 1 Tank	100	October 9, 2000		November 17, 2000
•	Additional OU-1 Soil Field Investigation	100	November 2, 2000		November 2, 2000
•	Sump 1 Tank Removal Confirmatory Results	100	November 8, 2001		January 5, 2001
•	Additional OU-1 PCB Soil Sample Collection	100			April 5, 2001
•	Additional OU-1 Investigation Report	100	January 2, 2001		June 11, 2001
•	EPA comments on Proposed OU-1 Soil Remedy	100			August 27, 2001
•	EPA Approval Installation of Infiltration Tile in Sump 1	100			September 28, 2001
•	Submitted request for bid	100			October 31, 2001
•	Contractor Arrangements	100			November 20, 2001
•	Implement PCB Soil Removal and Backfill	100	December 3, 2001		January 22, 2002
. •	Prepare and Submit RA Implementation Report	100			March 18, 2002
•	Sample Wells E-1 and F-1	100			August 8, 2002
•	Inject Water in Sump 1 (First Flush)	100			August 11/12, 2002
•	Inject Water in Sump 1 (Second Flush)	100			March 24, 2003
•	Sample Wells E-1 and F-1	100			June 3 and 4, 2003
	Inject Water in Sump 1 (Third Flush)			February 2004	

Note:

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(1) - Modified from May 2003 to June 2003 to maintain 3-month time period between water injection in Sump 1 and sampling of wells.

TABLE 2

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

Groundwater Investigations Beyond the Ruco Property (OU-3) September 2003

	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
•	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
٠	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 1 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 Arca 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 - Revised	100 100	June 1, 1999 February 16, 2001		June 11, 1999 May 28, 2001
•	Revised RI Report	100	May 25, 1999		November 16, 1999

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TABLE 2

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

Groundwater Investigations Beyond the Ruco Property (OU-3) September 2003

	Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
•	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
•	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	100	August 15, 2001		December 2001
	for VCM in GP-3	100			
•	EPA Conditional Approval for Predesign 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 ⁽²⁾	99	April 8, 2002	February 28, 2003 ⁽²⁾	
•	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 Predesign 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

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(1) Construction complete. Address air leakage and awaiting Northrop input on O&M Manual.

⁽²⁾ Revised startup date because of equipment defects and cold weather delays.