

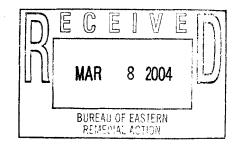
Miller Springs Remediation Management, Inc.

An affiliate of Glenn Springs Holdings, Inc.

Stephen Whyte Vice President, Operations Direct Dial (859) 543-2151 2480 Fortune Drive, Suite 300 Lexington, KY 40509 Facsimile (859) 543-2171

March 4, 2004

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 February 2004.

In summary, the following activities were performed in February 2004:

- i) Discussions continued with Northrop regarding the details of using Northrop's GP-1/GP-3 pumping and treatment system in combination with the biosparge remedy to address the VCM subplume.
- ii) The discussions also covered access issues related to the 95% design package submitted to the EPA on October 31, 2003 and the location of the control/operation facility for the air sparge system.
- iii) The potassium permanganate in the polishing bed of the GP-1/GP-3 supplemental system was changed out on February 12/13, 2004.
- The flexible coupling between the duct and outlet from the supplemental system blower was observed to be torn on February 16, 2004. The cause was the water infiltration into the vertical support pipe which froze, expanded, and lifted the duct by a few inches. The vertical separation distance was greater than the flexible coupling could accommodate resulting in the inadvertent separation from the blower. The coupling was replaced and the system was restarted on February 19, 2004. Spare flexible couplings, for both the inlet and outlet from the blower, have been ordered so that repairs, if needed, can occur more quickly in the future. In addition, drainage weep holes were drilled into the vertical support pipe to ensure a separation caused by the lifting action of ice will not be repeated.

v) Based on the monitoring results to date, the modified air components of the GP-1/GP-3 groundwater treatment system have been operating effectively.

In summary, the following activities are planned for March 2004:

- 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.
- iv) Flush Sump 1 with potable water, weather permitting. Flushing is tentatively scheduled for March 22 and 23, 2004.

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/jdh/6883/144

Encl.

c.c.: K. Lynch (USEPA)

M. E. Wieder (USEPA)

S. Scharf (NYSDEC)

Mans Schmidthe

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) February 2004

	Tusk 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
•	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
٠	Responses to EPA Comments on FS Report	100	June 21, 1999		July 7, 1999
٠	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
•	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

MILLER SPRINGS REMEDIATION MANAGEMENT, INC. HOOKEWRUCO SITE HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3) February 2004

Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
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 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	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 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