



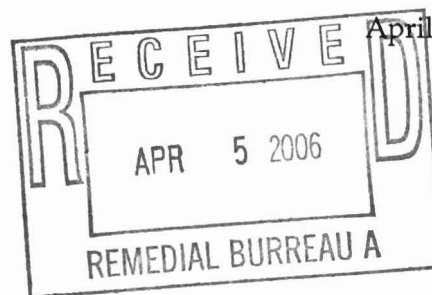
Miller Springs Remediation Management, Inc.

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Mr. Paul Olivo
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



April 4, 2006

Dear Mr. Olivo:

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 March 2006.

In summary, the following activities were performed in March 2006.

- i) Verbal EPA approval for abandonment of groundwater monitoring wells MW-50D1 and MW-50D2 was received on March 8, 2006;
- ii) The results of the final sampling for OU-1 were submitted to the EPA on March 16, 2006. The submittal included a recommendation that no further remedial actions need be implemented in the MW-E area and Sump 1.
- iii) A letter requesting abandonment of the remaining 6 groundwater monitoring wells on the Hooker/Ruco Site was submitted on March 17, 2006. Verbal EPA and NYSDEC approval to abandon these wells was received on March 21, 2006.
- iv) Continue operation and monitoring of the GP-1/GP-3 supplemental treatment system.
- v) Installation of groundwater monitoring well nests MW-88 and MW-90 was completed. The borehole for well nest MW-84 was drilled to a depth of 117 ft bgs. After installing the deeper well in MW-90 an approximate 30-foot length of the 7-inch diameter drill casing broke off spanning the shallower monitoring interval that was to have been used for the shallower wells. The borehole was completed by filling the inside of the casing with sand, then 10 feet of bentonite, then bentonite/grout to the ground surface. The shallower wells were installed within a new borehole that was installed a few feet away from the deeper well.

- vi) Background sampling of the groundwater wells was started.
- vii) Discussions are ongoing between MSRMI and Bayer regarding AOC 45 in which soil with PCB concentrations greater than 50 ppm have been delineated in accordance with Bayer's Work Plan. Responses to NYSDEC comments received in February 2006 on the Bayer RA Work Plan for the removal of the PCB impacted soils were submitted by Bayer on March 9, 2006.
- viii) A draft Declaration of Covenants and Restrictions for the Site was submitted to the EPA on March 20, 2006 by Bayer.
- ix) Construction of the Control Building started on November 17, 2005. In March, 2006:
 - a) preparations for tie-in to Northrop's water line are ongoing;
 - b) installation of the air and water lines was completed;
 - c) restoration of the Northrop property is ongoing;
 - d) work on the Control Building interior continued;
 - e) installation of electrical wiring continued; and
 - f) a new neutral wire for the main power line was installed to be in compliance with regulations which became effective in January 2006.
- x) Approximately 15,000 gallons of well installation and development waters was discharged to the Cedar Creek Water Pollution Control Plant in March.

In summary, the following activities are planned for April 2006:

- i) Complete well installations.
- ii) Complete installation of the utilities and equipment in the Control Building.
- iii) Closure of 6 offsite shallow groundwater monitoring wells.
- iv) Closure of the remaining 8 on-site groundwater monitoring wells (i.e., MW-50D1, MW-50D2, D-1, D-2, E-1, E-2, F-1, and F-2).
- v) Continue cooperative working arrangement with Bayer to address soil with elevated PCB concentrations in AOC 45. Awaiting DEC comments on Bayer responses submitted March 9, 2006 on the RA Work Plan.
- vi) Continue operating and monitoring of the GP-1/GP-3 supplemental system.
- vii) Complete background groundwater sample collection.
- viii) Perform system checks and initial start-up testing of the biosparge system

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,


for Steve Whyte
Project Manager

KDS/cb/006883/11
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)

March 2006

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
• 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 Pre-design 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
• PRAI'	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

TABLE 1

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

Groundwater Investigations Beyond the Ruco Property (OU-3)

March 2006

Task and Activity	Percentage of Activity Completed	Start Date	Scheduled Completion Date	Completion Date
• Design Supplemental System for VCM in GP-3	100	August 15, 2001		December 2001
• EPA Conditional Approval for Predesign Activities	100			September 28, 2001
• Issue 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
• 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 ⁽¹⁾	100	July 11, 2005		
• Arrange Contractors	100	January 2005		July 22, 2005
• Well Installation	90	September 13, 2005	March 31, 2006	
• Biosparge System Installation	90	November 2005	March 2006	
• Closure of On-Site and Off-Site Wells	75	November 2005	March 31, 2006	
• OU-1 Soil Borings	100	November 2005		January 11, 2006
• Biosparge System Start-Up	0	April 2006	May 31, 2006	
• Background Groundwater Sampling	5	March 27, 2006		