



Miller Springs Remediation Management, Inc.

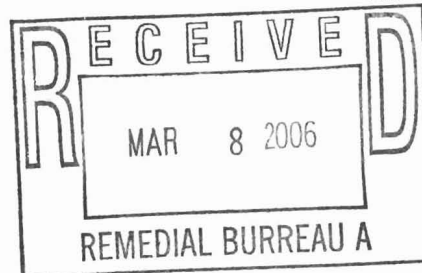
An affiliate of Glenn Springs Holdings, Inc.

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March 6, 2006

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



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 February 2006.

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

- i) Continue operation and monitoring of the GP-1/GP-3 supplemental treatment system.
- ii) Installation of groundwater monitoring well MW-82 was completed. Vadose zone well nest VZ-11 was completed. Started drilling MW-90.
- iii) Abandonment of the 20 groundwater monitoring wells on the Bayer property was completed.
- iv) 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. NYSDEC comments were received on the Bayer RA Work Plan submitted in January 2006 for the removal of the PCB impacted soils.
- v) Construction of the Control Building started on November 17, 2005. In February:
 - a) doors for the concrete vaults for the injection wells were installed;
 - b) installation of the air and water lines between the injection wells continued;
 - c) restoration of the Northrop property was started;
 - d) Control Building structure construction is complete except for some punch-list items. Work on the building interior continued.
 - e) installation of electrical conduit and wiring continued.

- vi) A request to discharge well installation and development waters was approved on January 31, 2006 by the Cedar Creek Water Pollution Control Plant. The first load of water will be discharged during the second week of March. Subsequent loads will be discharged as they accumulate.

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

- i) Awaiting soil sample analytical results for the boreholes drilled in the MW-E area and Sump 1 in January, 2006.
- ii) Continue well installations. Well installation is now anticipated to be completed by March 31, 2006.
- iii) Control Building. Complete Control Building construction and installation of the control/power conduits between the injection wells. Continue installation of equipment.
- iv) Closure of 6 offsite shallow groundwater monitoring wells according to previously received approval from the EPA. Closure to be completed in March, pending receipt of access permission from off-site property owners.
- v) Continue cooperative working arrangement with Bayer to address soil with elevated PCB concentrations in AOC 45.
- vi) Continue operating and monitoring of the GP-1/GP-3 supplemental 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,



 Steve Whyte
Project Manager

KDS/cb/006883/8
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)

February 2006

| <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 |
| • Crumman 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 |
| • Crumman 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 |
| • 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 |

TABLE 1

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

Groundwater Investigations Beyond the Ruco Property (OU-3)

February 2006

| <i>Task and Activity</i> | <i>Percentage of Activity Completed</i> | <i>Start Date</i> | <i>Scheduled Completion Date</i> | <i>Completion Date</i> |
|---|---|--------------------|----------------------------------|------------------------|
| ▪ 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 |
| ▪ 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⁾ | 90 | July 11, 2005 | | |
| ▪ Arrange Contractors | 100 | January 2005 | | July 22, 2005 |
| ▪ Well Installation | 80 | September 13, 2005 | March 31, 2006 | |
| ▪ Biosparge System Installation | 80 | 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 | |

Note:

⁽¹⁾ - The remaining permit needed is the one for electrical hookup. Receipt is expected shortly.