



Miller Springs Remediation Management, Inc.

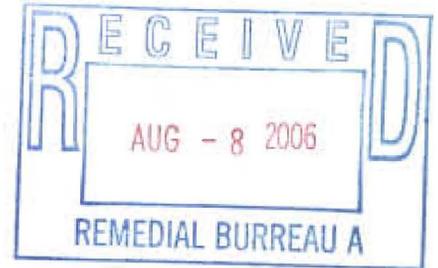
An affiliate of Glenn Springs Holdings, Inc.

Stephen A Whyte
Vice President, Operations
Direct Dial (859) 543-2151

2480 Fortune Drive, Suite 300
Lexington, KY 40509
Facsimile (859) 543-2171

August 4, 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 July 2006. Please note that future progress reports will be submitted on a quarterly basis with the next report submitted by October 15, 2006.

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

- i) Continue operation and monitoring of the GP-1/GP-3 supplemental treatment system.
- ii) Excavation and removal of the PCB impacted materials on the Hooker Chemical/Ruco Polymer Corporation Site was completed by Bayer on July 13, 2006. Materials removed included AOC 45 concrete with PCB concentrations >50 ppm overlying the PCB impacted soil and the PCB soil with >10 ppm PCBs. Forty truck loads with a total weight of 1,380 tons were transported to and disposed of at the CWM Model City facility. NYSDEC personnel were on-site during the project and approved the limits of excavation as being complete.
- iii) Construction of the Control Building started on November 17, 2005. In July 2006:
 - a) restoration of the Northrop property was completed;
 - b) work on the Control Building interior was completed; and
 - c) shakedown and start-up of the system continued.
- iv) The eight remaining groundwater monitoring wells on the Ruco Site were abandoned.

In summary, the following activities are planned for August/September 2006:

- i) Complete system checks and start-up testing of the biosparge system.

- ii) Continue operating and monitoring of the GP-1/GP-3 supplemental system.
- iii) A pre-final inspection will be scheduled on or about August 22, 2006 after the punch list of open items has been addressed. During the Pre-Final Inspection, a date will be set for the Final Inspection, if one is needed.
- iv) Awaiting EPA comments on the results of the final sampling for OU-1, which were submitted 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. Sumps 1 and 2 will be backfilled by Bayer in the next quarter.
- v) Awaiting EPA comments on the draft Declaration of Covenants and Restrictions for the Site, which was submitted on April 20, 2006 by Bayer.
- vi) Within 30 days after the Final Inspection, the following documents will be submitted to EPA:
 - a) "As-Recorded" Construction Drawings;
 - b) Well Stratigraphic and Instrumentation Logs;
 - c) Groundwater analytical results for the samples collected between March and June of 2006; and
 - d) Draft Operation, Maintenance and Monitoring Manual, including an updated Health and Safety Plan which incorporates O,M&M activities.

Additional details will be provided in future 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/006883/16
Encl.

- c.c.:
- K. Lynch (USEPA)
 - M. E. Wieder (USEPA)
 - S. Scharf (NYSDEC)
 - M. Popper (CDM)
 - T. Kelly (Nassau County)
 - J. Robinson (Bayer)
 - R. Passmore (MSRMI)
 - J. Kay (CRA)

TABLE 1
 MILLER SPRINGS^a REMEDIATION MANAGEMENT, INC.
 HOOKER/RUCO SITE
 HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3)

July 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 |
| • 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 |

TABLE 1
MILLER SPRINGS REMEDIATION MANAGEMENT, INC.
HOOKER/RUCO SITE
HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3)

July 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 |
| • 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 | 100 | July 11, 2005 | | November 10, 2005 |
| • Arrange Contractors | 100 | January 2005 | | July 22, 2005 |
| • Well Installation | 100 | September 13, 2005 | | April 28, 2006 |
| • Biosparge System Installation | 100 | November 2005 | | May 2006 |
| • Closure of On-Site and Off-Site Wells | 100 | November 2005 | | May 10, 2006 |
| • OU-1 Soil Borings | 100 | November 2005 | | January 11, 2006 |
| • Biosparge System Start-Up | 99 | April 2006 | August 14, 2006 | |
| • Background Groundwater Sampling | 100 | March 27, 2006 | | June 14, 2006 |

Scanned & Doced
Steve

1-30-004



Miller Springs Remediation Management, Inc.

An affiliate of Glenn Springs Holdings, Inc.

Rick Passmore
Project Manager
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Lexington, KY 40509
Facsimile (859) 543-2171

October 4, 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: Notification of Project Manager Change
Hicksville Site; Hooker Chemical/Ruco Polymer Corporation Site
Index Nos. II-CERCLA-80216, II-CERCLA-94-0210, and II-CERCLA-02-2001-2018

This letter serves as notification of Miller Springs Remediation Management, Inc. project responsibility changes for the above referenced Project. Effective October 1, 2006, I have replaced Mr. Steve Whyte as the OxyChem Project Coordinator. All communications regarding this project should be directed to my attention at the following address and phone number:

Richard Passmore
Glenn Springs Holdings, Inc.
2480 Fortune Drive, Suite 300
Lexington, KY 40509
Office: 859-543-2152
Fax: 859-543-2171
Email: rick_passmore@oxy.com

Steve Whyte will still be available for the next several months to assist in the transition and provide historic perspective/feedback. I look forward to working with you on this project and appreciate your understanding as we go through this transition. If you have any questions, please call me at the above number.

Sincerely yours,

Rick Passmore
Project Manager

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