



Glenn Springs Holdings, Inc.

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April 5, 2012

Mr. Thomas Taccone
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. Taccone:

Re: Quarterly Report – First Quarter 2012 (January through March)
Administrative Orders Hooker Chemical/Ruco Polymer Corporation Site
Index Nos. II-CERCLA-80216, II-CERCLA-94-0210, and II-CERCLA-02-2001-2018

This submittal provides the Quarterly Progress Report covering January through March 2012 for the Hooker/Ruco Site in Hicksville, New York. This report covers OU-1, OU-2, and OU-3. Please note that the next Quarterly Progress Report will be submitted by July 15, 2012 and will cover April through June 2012.

Quarterly Progress Report

The following activities were performed in January through March 2012.

Notification was received on January 11, 2012 that Steve Scharf is the new NYSDEC Project Manager for the Bayer (former Hooker/Ruco) site.

The quarterly progress report covering the period October through December 2011 was submitted on January 13, 2012.

Operable Unit-1 (On-Site Soil)

All work has been successfully completed. OU-1 is closed.

Operable Unit-2 (Soils Impacted by On-Site Release of PCBs)

All work has been successfully completed. OU-2 is closed.

On October 27, 2011, the USEPA requested a copy of the OU-2 Remedial Action Report dated March 1993 and prepared by Leggette, Brashears & Graham, Inc. Efforts are ongoing to obtain a copy of this report.

Operable Unit-3 (Off-Site Groundwater)

An electronic data deliverable (EDD) for groundwater data subsequent to October 2010 was submitted to the USEPA on March 26, 2012. USEPA requested that an EDD be provided for all future monitoring data.

Supplemental Treatment System

- Operation and monitoring of the GP-1/GP-3 supplemental air treatment system continued
- The carbon bed was changed out on January 26, 2012
- Evaluations of possible upgrade alternatives for the supplemental treatment system are ongoing

Biosparge System

See Figures 1 and 2 for system layout and Figures 3 and 4 for system cross-sections.

Notification of the start of construction for the remainder of the biosparge system was submitted to the USEPA on January 27, 2012. A pre-construction meeting was held on February 9, 2012 with representatives of GSHI, Northrop, Steel Equities, Sleepys, CRA and CRA's subcontractors. The biosparge system compressors were shut down and locked out on March 2, 2012 so that air pressure generated by the compressors would not create health and safety risks during construction.

Contractor mobilization started on March 5, 2012. Construction activities to March 31, 2012 include:

- i. Installation of below the floor grate piping and grating support steel in the vaults for IW-1 through IW-8
- ii. Installation of grating and welded piping above the grating in the vaults for IW-1 and IW-2
- iii. Removal of existing piping in the vaults for IW-16 through IW-19

USEPA comments on the updated QAPP submitted on October 24, 2011 were received December 6, 2011. The revised QAPP, incorporating the USEPA comments, was submitted to the USEPA on January 3, 2012. USEPA comments on the revised QAPP were received on February 17, 2012 and a conference call with the USEPA was held on March 1. Items to be discussed during the March 1, 2012 conference call were provided to the USEPA on February 28, 2012. Pursuant to discussions held during the call, draft select pages of the QAPP and a comment were provided to the USEPA on March 8 and 12, 2012, respectively, for interim review. USEPA approval of the March 8 submissions was received on March 30, 2012.

The two drums of drill cuttings from the installation of groundwater monitoring wells MW-92 and MW-93 were removed from the Site on March 30, 2012.

A surveyor has been retained to survey the groundwater and vadose zone monitoring wells installed in 2010 and 2011. The remainder of the newly constructed biosparge system will be surveyed when installation of the biosparge system expansion is completed.

Summary of Biosparge Pilot System

The dissolved oxygen, total volatile organic compounds (TVOC), and vinyl chloride monomer (VCM) concentration trends for the individual groundwater monitoring wells are shown on Figures 5 through 11.

To date, the results show that the biosparge Pilot System has operated successfully as demonstrated by the following:

- i. Dissolved oxygen (DO) levels in the groundwater have increased and, in general, are greater than the target concentration of 2 milligrams per litre (mg/L)
- ii. The VCM concentrations are decreasing as a result of the microbial biodegradation processes

Planned Second Quarter 2012 Activities

The following activities are planned for the second quarter of 2012:

- i. Continue operation and monitoring of the GP-1/GP-3 supplemental air treatment system
- ii. Change-out of the supplemental treatment system carbon bed is tentatively planned for the week of April 16, 2012
- iii. Complete and submit a revised final version of the QAPP (final comment response was received April 2, 2012)
- iv. Upon submittal of the QAPP, schedule the first semi-annual biosparge system performance monitoring event and provide 14-day notification to the USEPA
- v. Continue installation of the injection well vaults, piping, conduit, etc. for the remainder of the biosparge system's middle fence and the feed lines to the north fence

The following activities are pending an approval or review by the USEPA. The follow-up schedule is based on receipt of the review or approval:

- i. No activities for this quarter

Should you have any questions on the above, please do not hesitate to contact me at (972) 687-7516 or e-mail at Roger_Smith@oxy.com.

Yours sincerely,



Roger Smith
Senior Project Manager

KDS/lp/006883/28

Encl.

cc: P. Mannino (USEPA)
M. E. Wieder (USEPA)
S. Scharf (NYSDEC - PDF on CD)
M. Popper (CDM)
T. Kelly (Nassau County)
W. Baldwin (Bayer)
J. Kay (CRA)

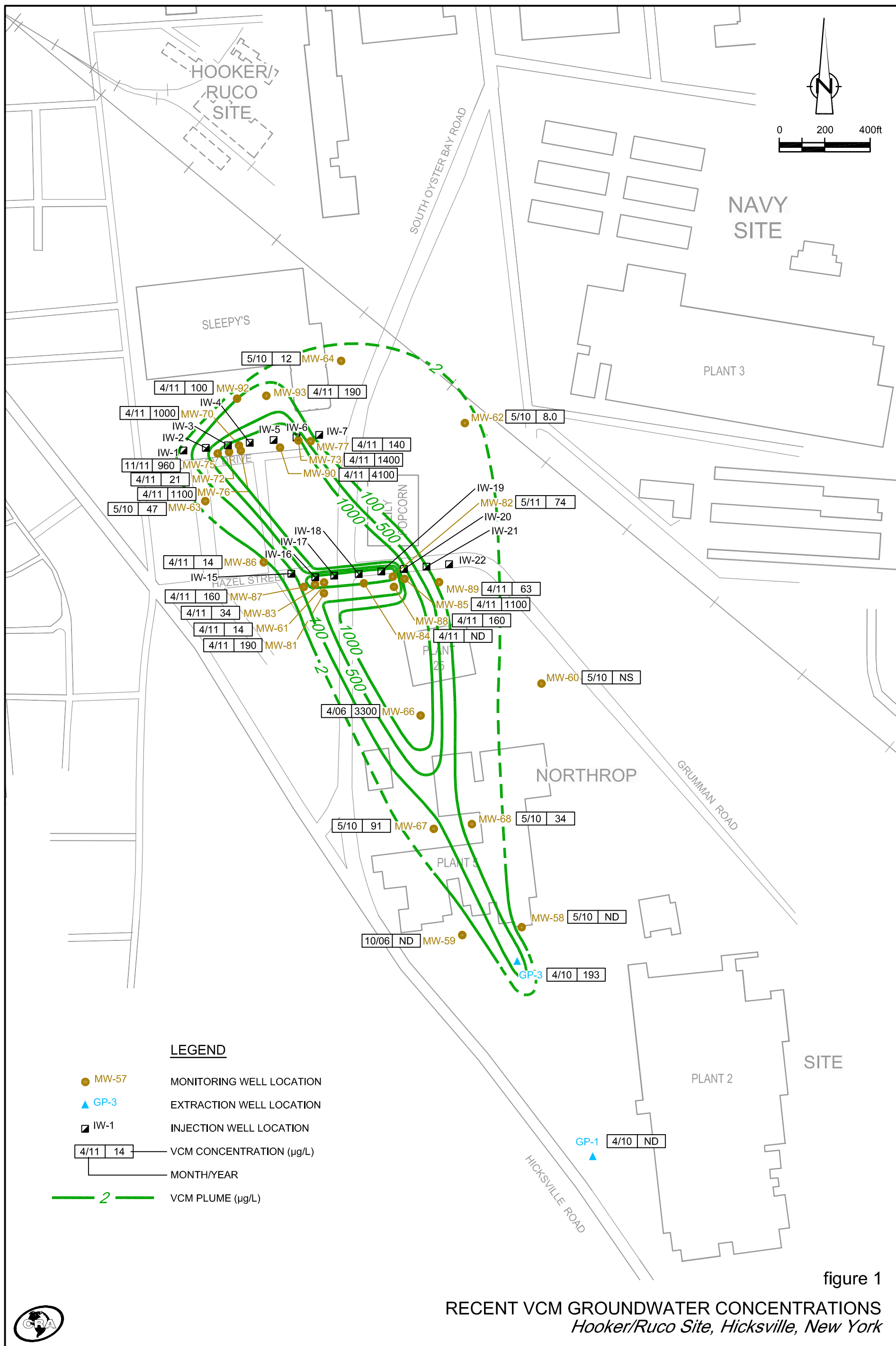


figure 1

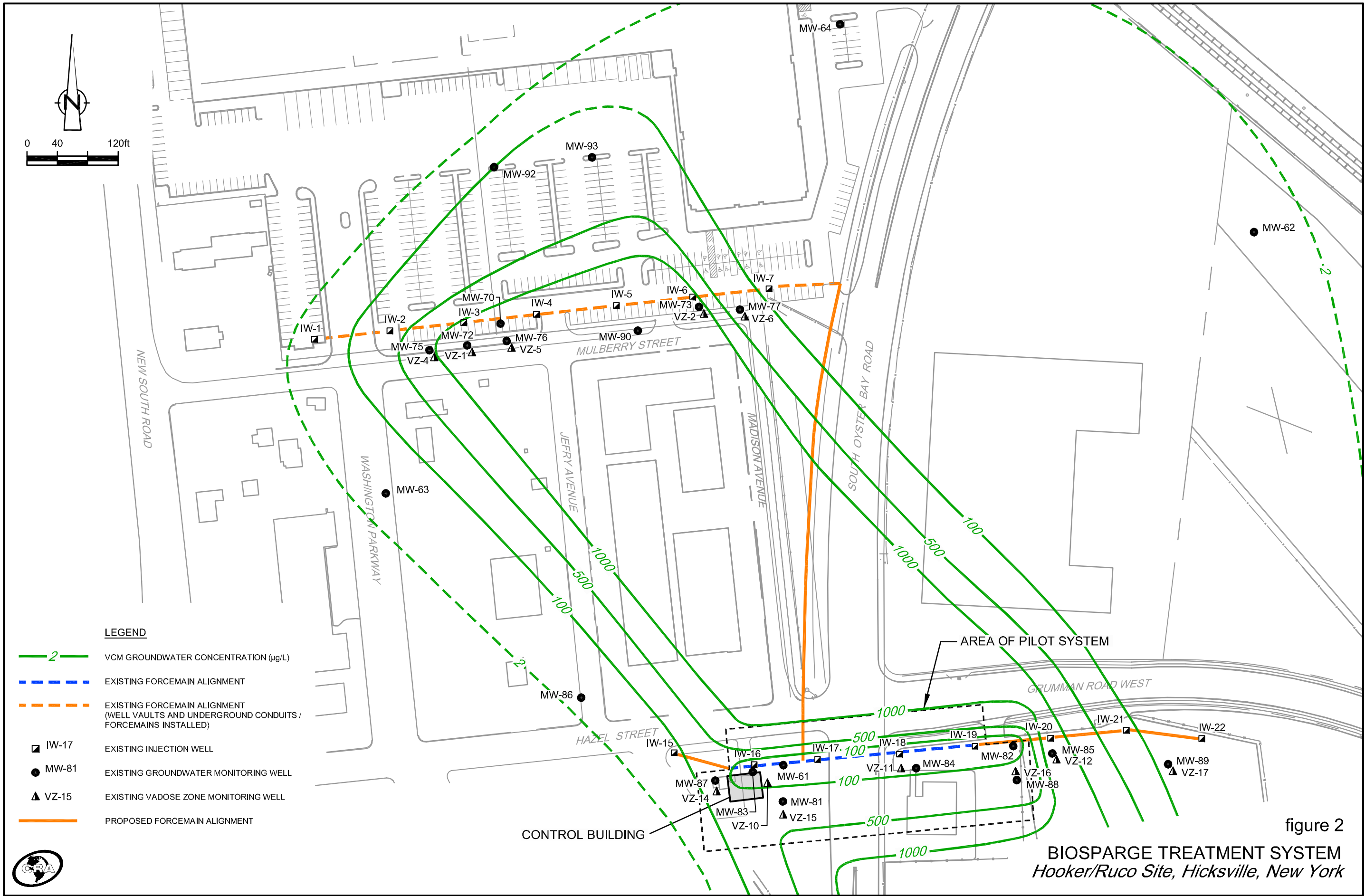
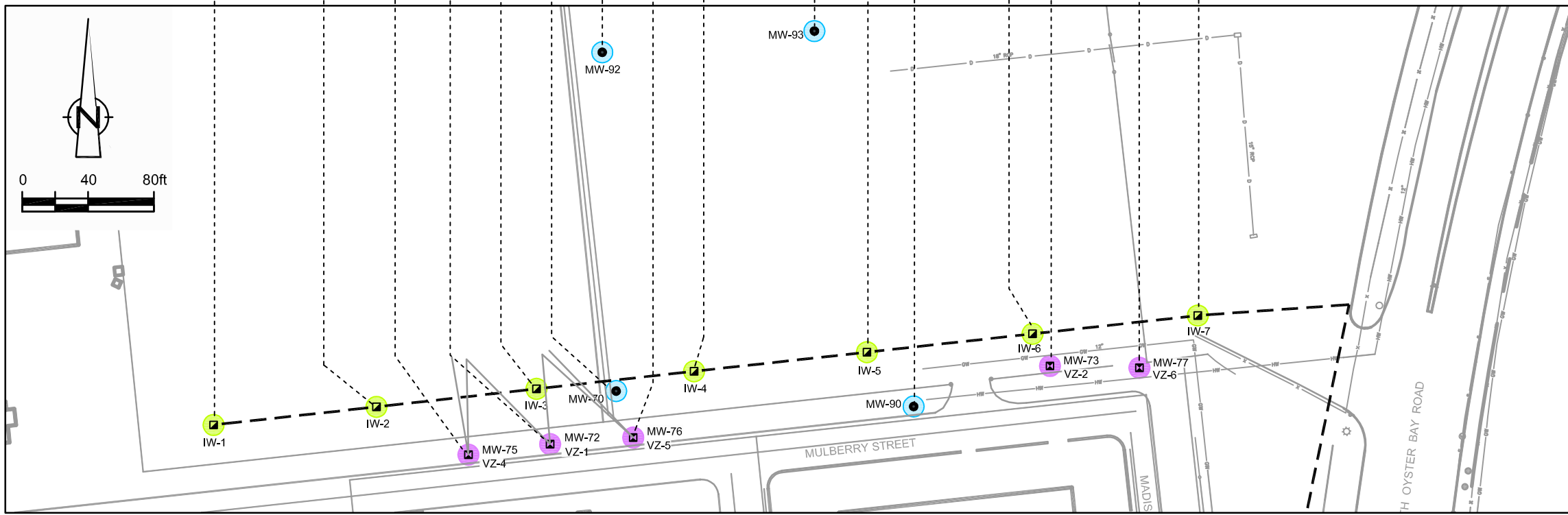
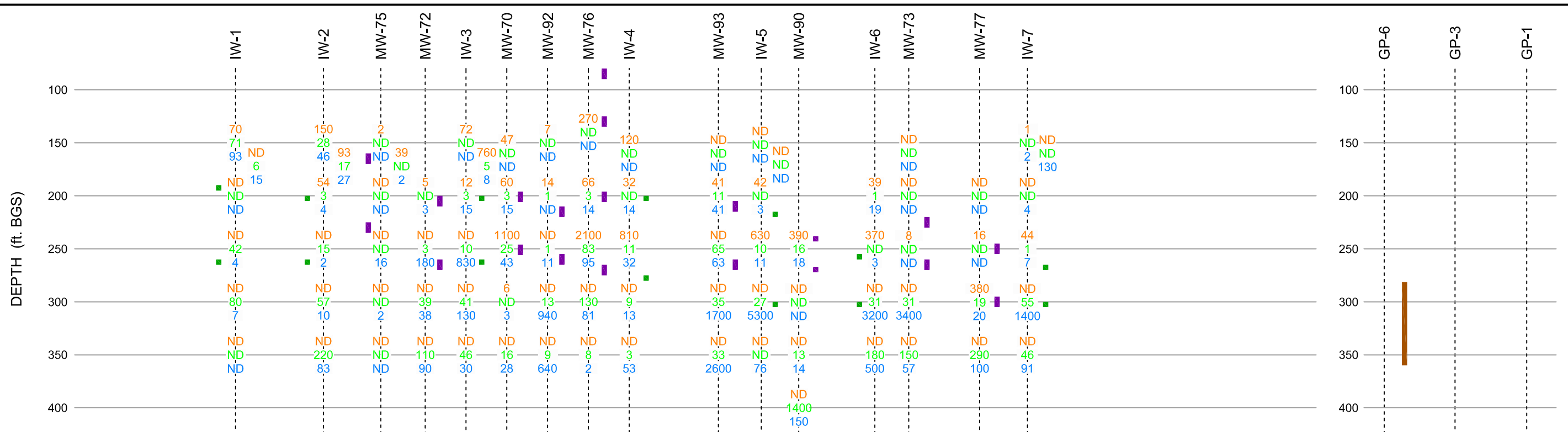


figure 2
 BIOSPARGE TREATMENT SYSTEM
 Hooker/Ruco Site, Hicksville, New York



- LEGEND**
- FORCE MAIN ALIGNMENT
 - MW-90 GROUNDWATER MONITORING WELL LOCATION
 - IW-4 INJECTION WELL LOCATION
 - ⊠ MW-76 VZ-5 GROUNDWATER AND VADOSE ZONE MONITORING WELL LOCATION
 - AIR INJECTION WELL SCREENED INTERVAL
 - GROUNDWATER MONITORING WELL SCREENED INTERVAL
 - PUMPING WELL SCREENED INTERVAL
 - 670 HYDROPUNCH VCM CONCENTRATION (µg/L)
 - 750 HYDROPUNCH TCE CONCENTRATION (µg/L)
 - 130 HYDROPUNCH PCE CONCENTRATION (µg/L)

figure 3

NORTH FENCE INJECTION AND MONITORING WELL SCREENED INTERVALS
Hooker/Ruco Site, Hicksville, New York



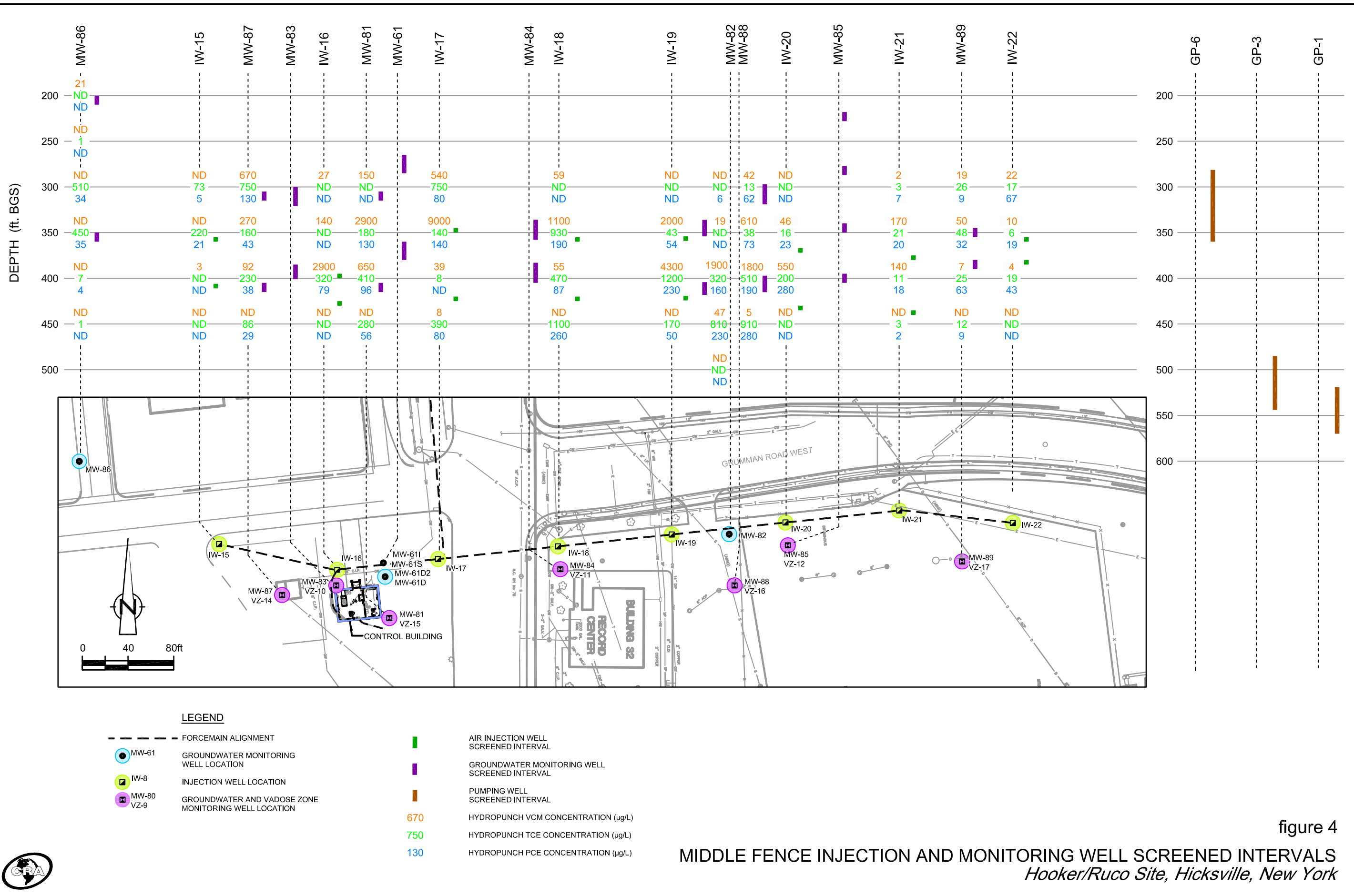


figure 4

MIDDLE FENCE INJECTION AND MONITORING WELL SCREENED INTERVALS
Hooker/Ruco Site, Hicksville, New York

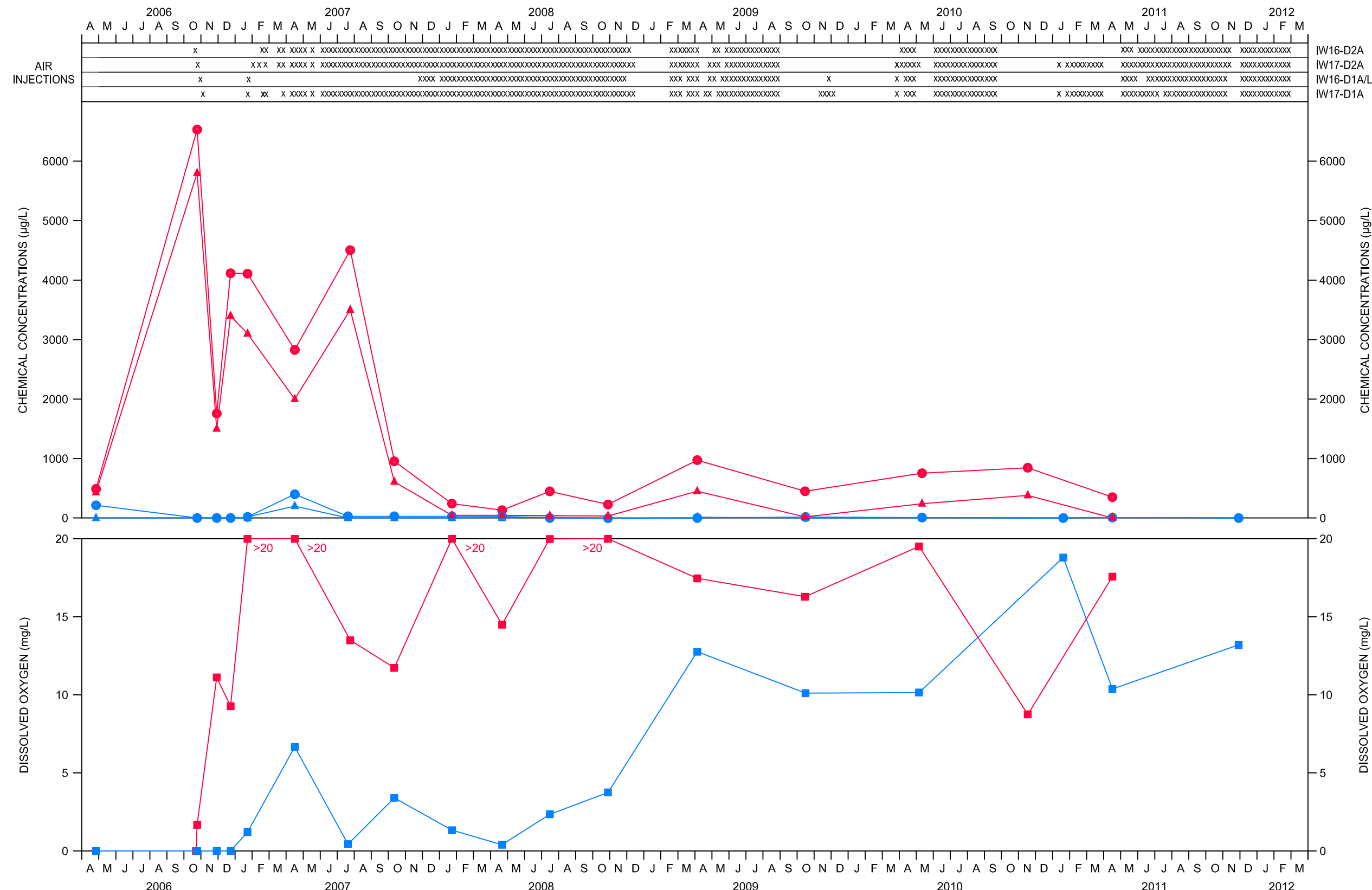


figure 5

WELL NEST MW-61
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



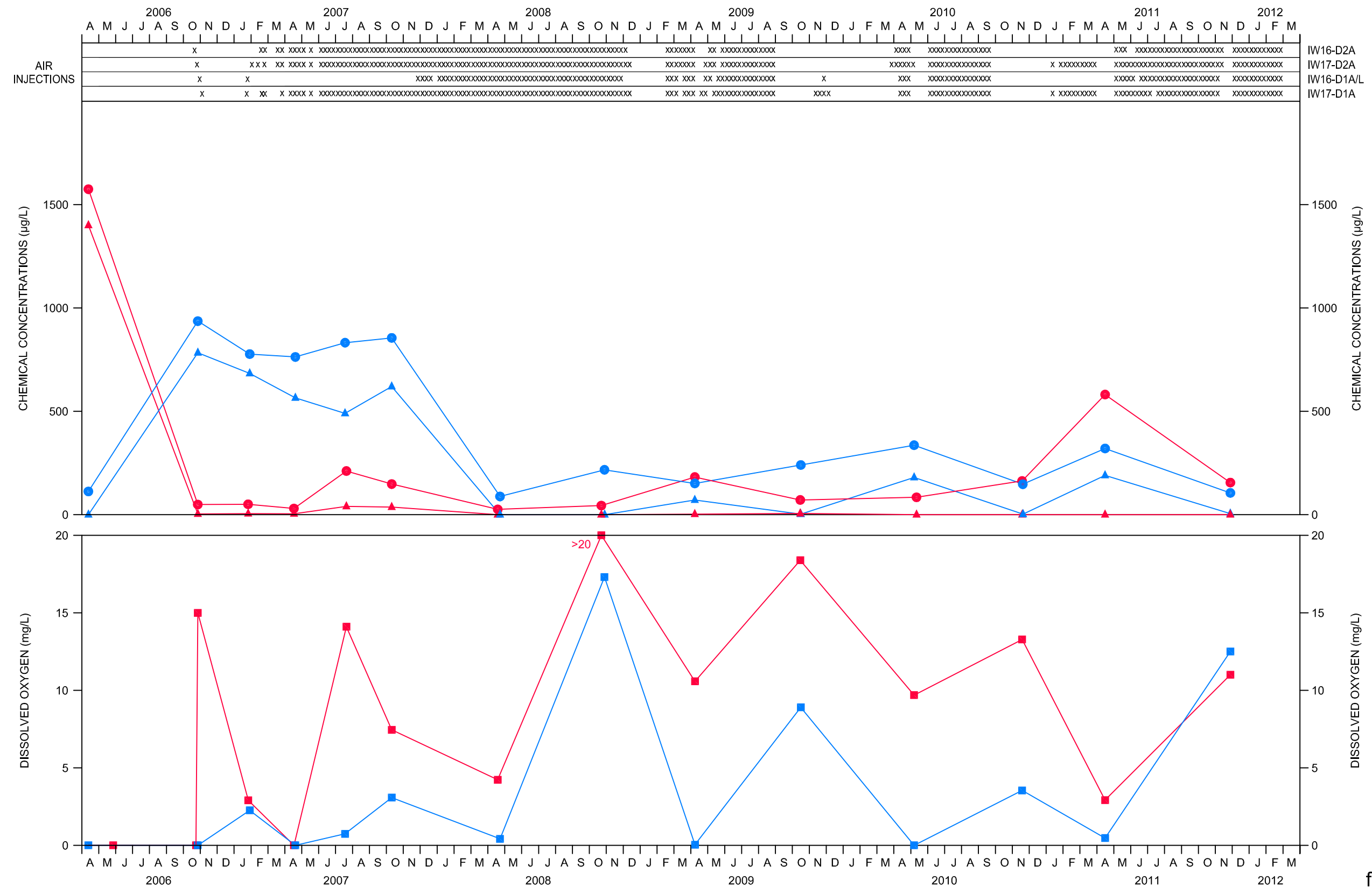
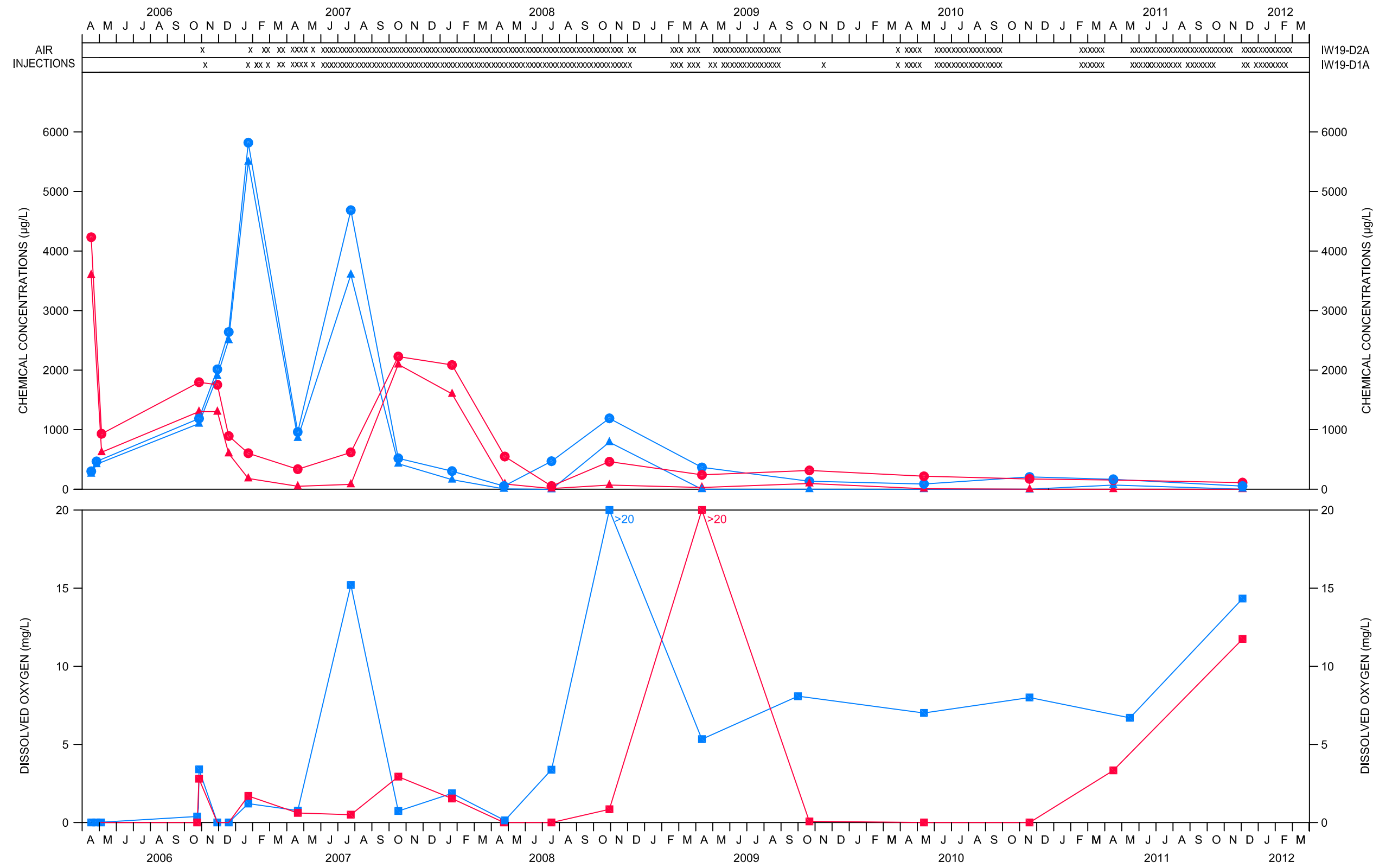


figure 6

WELL NEST MW-81
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York





- TVOCs
- ▲ VCM
- DO
- MW-82D1
- MW-82D2

figure 7
 WELL NEST MW-82
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



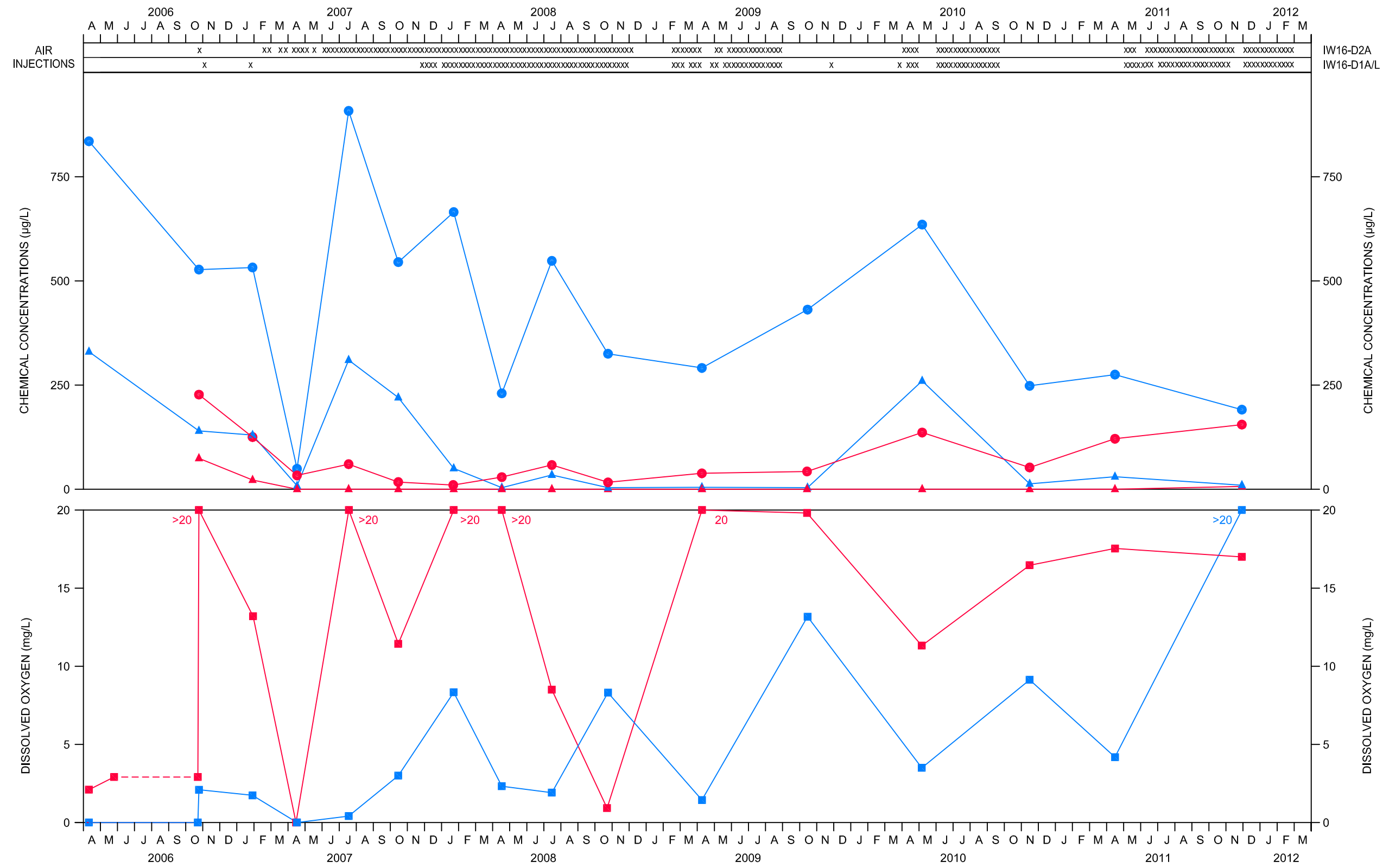
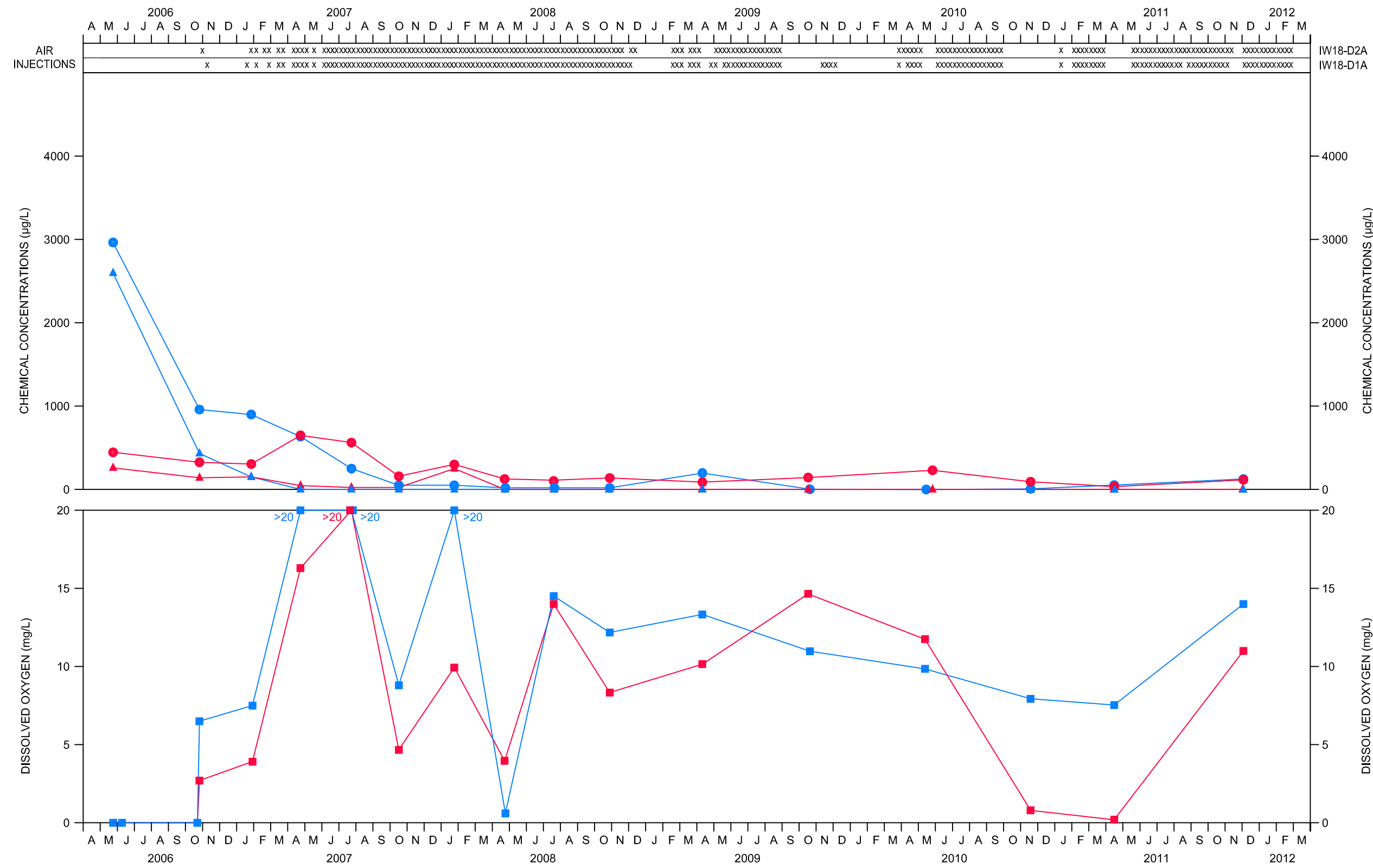


figure 8
 WELL NEST MW-83
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York

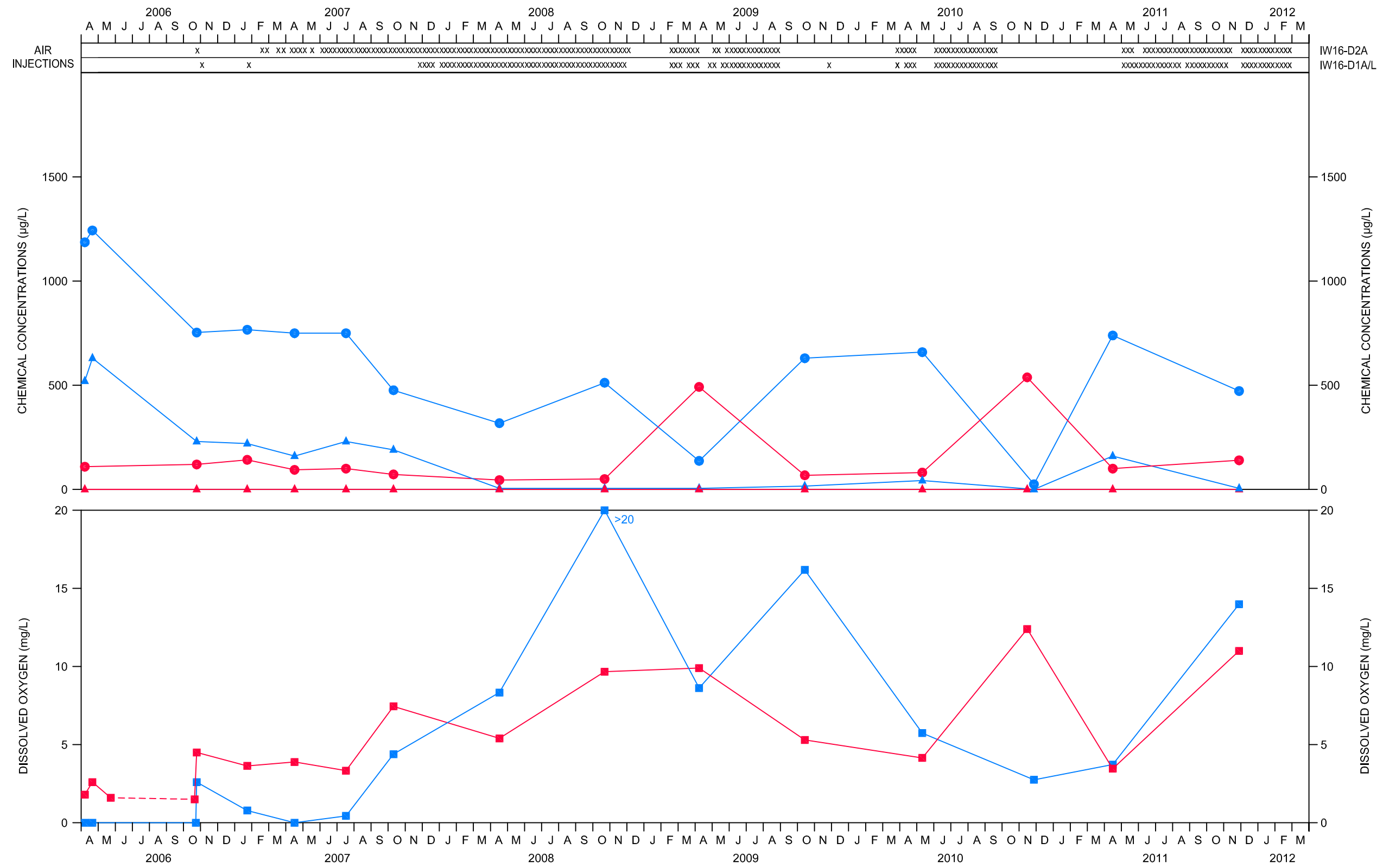




● TVOCs — MW-84D1
 ▲ VCM — MW-84D2
 ■ DO

figure 9
 WELL NEST MW-84
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



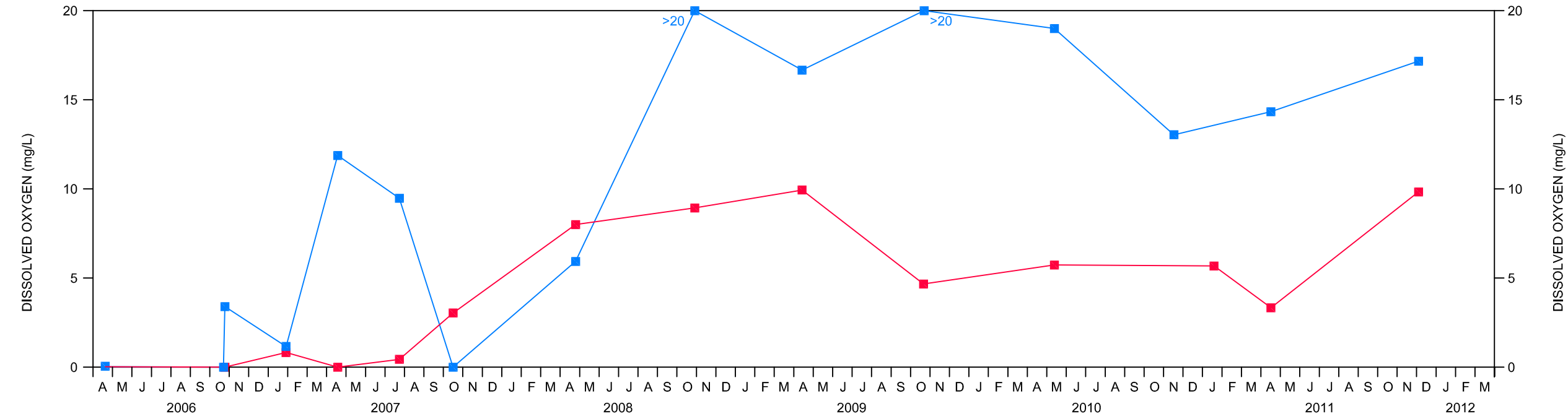
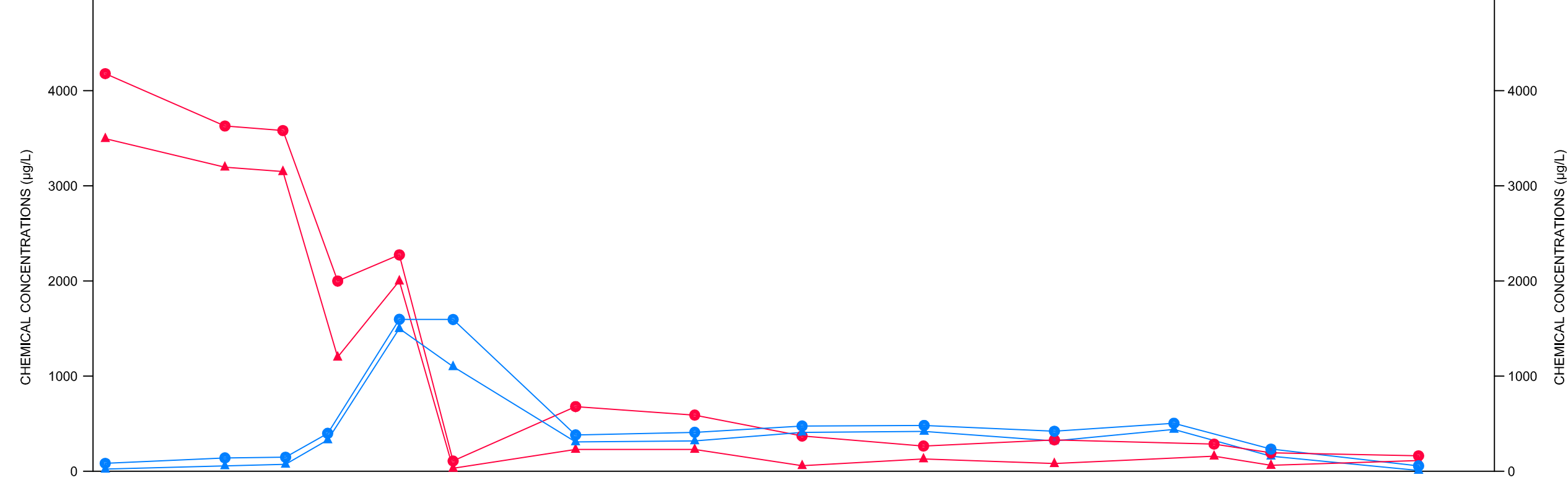


● TVOCs — MW-87D1
 ▲ VCM — MW-87D2
 ■ DO

figure 10
 WELL NEST MW-87
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



2006 2007 2008 2009 2010 2011 2012
 AIR INJECTIONS
 IW19-D2A
 IW19-D1A



● TVOCs — MW-88D1
 ▲ VCM — MW-88D2
 ■ DO

figure 11
 WELL NEST MW-88
 CHEMICAL CONCENTRATION PLOTS
 MIDDLE INJECTION FENCELINE
 Hooker/Ruco Site, Hicksville, New York



GLENN SPRINGS HOLDINGS INC.
HOOKER/RUCO SITE
HICKSVILLE, NEW YORK

Groundwater Investigations Beyond the Ruco Property (OU-3)

January through March 2012

<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
• 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 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

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• 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
• 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

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• OU-1 Soil Borings	100	November 2005		January 11, 2006
• Background Groundwater Sampling	100	March 27, 2006		June 14, 2006
• Pre-Start Sampling	100			October 24, 25, and 26, 2006
• Final Inspection	100			October 27, 2006
• Biosparge System Start-Up	100			October 27, 2006
• First Monthly Sampling	100			November 28 to 30, 2006
• Second Monthly Sampling	100			December 20 and 21, 2006
• Noise Survey	100			January 18, 2007
• 2007 First Quarterly Sampling	100			January 23 to 30, 2007
• Submission of Phase I Construction Documents	100			February 1, 2007
• 2007 Second Quarterly Sampling	100			April 18 to 27, 2007
• 2007 Third Quarterly Sampling	100			July 16 to 27, 2007
• 2007 Fourth Quarterly Sampling	100			October 8 to 18, 2007
• Evaluation/Recommendation for Design Modifications	100			January 15, 2008
• 2008 First Quarterly Sampling	100			January 22 to 28, 2008
• 2008 Second Quarterly Sampling	100			April 16 to 25, 2008
• 2008 Third Quarterly Sampling	100			July 15 to 18, 2008
• 2008 Fourth Quarterly Sampling	100			October 21 to 30, 2008
• Construction of North Fence Underground Components	100			December 23, 2008
• 2009 First Semi-Annual Sampling	100			April 7 to 14, 2009
• Response to USEPA Biosparge System Comments	100	August 27, 2009		September 23, 2009
• 2009 Second Semi-Annual Sampling	100			October 13 to 21, 2009
• Submittal of Biodegradation Supporting Information	100			November 30, 2009
• Submittal of Revised Schedule	100			February 3, 2010
• Submittal of PDB/HydraSleeve™ Evaluation	100			February 11, 2010
• Trailing Edge Proposal	100			March 15, 2010
• Distribution of RFP for Biosparge System Well Installation	100			June 25, 2010
• Contracted Well Driller	100			August 3, 2010
• Install Biosparge System Wells	100	September 20, 2010		May 15, 2011
• Distribution of RFP for Biosparge System Expansion	100			May 4, 2011
• Receipt of Bids	100			June 17, 2011
• Submittal of PDB/HydraSleeve™ Evaluation	100			August 31, 2011
• USEPA Concurrence For Use of PDB Samplers	100			September 22, 2011
• Update QAPP	100	September 22, 2011		October 24, 2011
• Revise Updated QAPP	100	December 6, 2011		January 3, 2012
• USEPA Comments received on revised updated QAPP	50	February 17, 2012		
• Construction of Remainder of Biosparge System	27	March 5, 2012	July 31, 2012	