



November 8, 2019

Reference No. 081618

Mr. Steven Scharf
New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Solid Waste and Corrective Action
625 Broadway
Albany, New York
12233-7015

Dear Mr. Scharf:

**Re: October 2019 Progress Report
Order on Consent and Administrative Settlement Index #A1-0799-12-10
Operable Unit 5, RUCO Polymer Corp., Hicksville, NY (Site #130004)**

GHD, on behalf of Covestro and Glenn Springs Holdings, Inc. (GSH), has prepared this submittal that provides the monthly progress report for October 2019 for the former RUCO Polymer Corp. (RUCO) Site in Hicksville, New York. This submittal covers Operable Unit 5 (OU-5) activity. The OU-5 Order on Consent became effective on September 30, 2013 and the Record of Decision was received on March 31, 2017.

Actions performed during the Reporting Period

1. Submitted the September 2019 progress report for OU-5 to the New York Department of Environmental Conservation (NYSDEC) on October 10, 2019.
2. Continued operation and maintenance phase of the remedy, which involves monitoring of the sub-slab depressurization (SSD) systems per the Remedial Design dated January 16, 2018. Field measurement of flow rate, vacuum, and vapors, and collection of samples for analysis from the six SSD systems was performed on October 8, 2019

Actions anticipated to be performed in the Next Month

1. Continue operation and maintenance phase of the remedy, which involves monitoring of the SSD systems per the Remedial Design dated January 16, 2018. Field measurement of flow rate, vacuum, and vapors and collection of samples for analysis on an approximate quarterly basis. Next event is scheduled for December 2019.
2. Complete validation of analytical results from the SSD system sampling and submit.

Approved Modifications to Work Plans/Schedule

1. Evaluate the full-scale system to confirm that multi-stack system emissions are within and below the updated NYSDEC Division of Air Resources (DAR) 6 NYCRR Part 200 Series Emission Guideline Values per NYSDEC April 10, 2019 letter.



2. Overall schedule for upcoming milestones per the RD are as follows:
 - a. Operate all SSD systems for one year. Testing of the full-scale system will include calculations confirming the above for the full-scale multi-stack system.
 - b. Submit the Final Engineering Report.

Analytical and Testing Results

1. None during this reporting period.

Unresolved Delays

1. None during this reporting period.

Citizen Participation Plan

1. None during this reporting period.

Should you have any questions on the above, please do not hesitate to contact the undersigned at 519-340-4313 or email john.pentilchuk@GHD.com.

Yours truly,

GHD

A handwritten signature in blue ink that reads "John Pentilchuk". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Pentilchuk".

John Pentilchuk

JP/kf/86

- cc: Renata Ockerby (NYSDOH)
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