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02.04.2024

Aiden Conway
Remedial Project Manager
U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 20th Floor
New York, New York 10007-1866

Re: Proposed Sample Frequency Modification
Operable Unit 3
Hooker Chemical/Ruco Polymer Corporation Site

Dear Mr. Conway:

The "Evaluation Report – Trial/Partial Biosparge System Shutdown", dated October 9, 2024, contained a figure that presented the most recent vinyl chloride monomer (VCM) concentrations for all wells currently sampled as part of the Hooker Chemical/Ruco Polymer Corporation Site Operable Unit OU3 monitoring program. Each well was color-coded on the figure to indicate the following:

- Current VCM concentration above 2 micrograms per liter (µg/L)
- VCM concentration at or below 2 µg/L or non-detect for less than three years
- VCM concentration non-detect for more than three years

This figure has been reproduced for reference (see Figure 1). As shown on the figure, there are many wells where VCM has not been detected for more than three years. This suggests that a change in sampling frequency is appropriate for many of these wells. As such, the attached Table 1 was developed. This table lists all the monitoring wells currently sampled, the date of last VCM exceedance of the performance standard (2 µg/L), the date of last VCM detection, the number of events and years since the last VCM detection, the current sampling frequency, and the proposed sampling frequency based on these data. As indicated in the table, Glenn Springs Holdings, Inc. (GSH) is proposing to modify the sampling frequency for many of the monitoring wells. It should be noted that the reporting limit for VCM at times exceeded the maximum contaminant level (MCL) for VCM of 2 µg/L. Table 2 presents a summary of the wells that are proposed for a reduced monitoring frequency and the VCM reporting limit for the past 4 sampling events for each. As shown in the table, the reporting limit for VCM was 2 µg/L or below for at least 2 of the 4 sampling events for all wells. The majority of wells in Table 2 had a reporting limit of 1 µg/L for all four events. All wells in the last sampling event (October 2024) had a reporting limit of 1 except for one duplicate sample at 2 µg/L. The above demonstrates that current VCM concentrations are below the MCL. Figure 2 presents the current sampling frequency and the proposed frequency for each

monitoring well where frequency changes are proposed. Upon approval by the United States Environmental Protection Agency (EPA), GSH would implement these changes for the first 2025 sampling event.

Please let me know if you have any questions or would like to discuss these changes.

Sincerely,

Paul J. Bluestein PE PMP
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cc: John Pentilchuk (GHD)

HOOKER/
RUCO
SITE

SOUTH OYSTER BAY ROAD

NAVY
SITE

SLEEPY'S

PLANT 3

8/24 | 9.0 MW-92

MW-93 10/23 | 1.5

IW-4

8/24 | 1.5 MW-70

IW-3

IW-2

IW-1

8/24 | 1.6 MW-75

8/24 | 5.2 MW-72

8/24 | 13 MW-76

10/23 | ND MW-63

IW-5 IW-6 IW-7

MW-77 4/24 | ND

MW-73 10/23 | ND

MW-90 4/24 | ND

MULBERRY DRIVE

MW-62 10/23 | 7.1

LILY
POPCORN

IW-19

MW-82 4/24 | ND

IW-20

IW-21

IW-17 IW-18

IW-16

4/24 | ND MW-86

IW-22

MW-89 4/24 | ND/ND

IW-15

HAZEL STREET

8/24 | ND MW-87

MW-85 4/24 | ND

8/24 | ND MW-83

MW-88 4/24 | ND

8/24 | ND MW-61

MW-84 4/24 | ND

8/24 | ND MW-81

PLANT
25

MW-60 5/13 | ND

10/23 | ND MW-66

NORTHROP

GRUMMAN ROAD

4/24 | ND MW-67

MW-68 4/24 | ND

PLANT 5

MW-58 4/24 | ND

4/24 | ND MW-59

WELL-3R (2) 4/24 | 1.7 (1)

4/24 | 32.6/39.7 MW-3-1(2)

GP-3

PLANT 2

SITE

GP-1 (2) 5/24 | ND

HICKSVILLE ROAD

LEGEND

- MW-57 — EXISTING MONITORING WELL LOCATION
- GP-3 — FORMER EXTRACTION WELL LOCATION
- WELL-3R — CURRENT EXTRACTION WELL LOCATION
- IW-1 — EXISTING INJECTION WELL LOCATION
- VCM CONCENTRATION NON-DETECT FOR MORE THAN 3 YEARS
- VCM CONCENTRATION AT OR BELOW 2 µg/L OR NON-DETECT FOR LESS THAN 3 YEARS
- VCM CONCENTRATION ABOVE 2 µg/L
- µg/L — MICROGRAMS PER LITER
- 4/13 | 140 — VCM CONCENTRATION (µg/L); MONTH/YEAR
- (1) — PUMPING WELL DRAWS GROUNDWATER FROM LARGER SURROUNDING AREA
- (2) — WELL SAMPLED AND DATA REPORTED BY NORTHROP

0 200 400 ft

Coordinate System:
NY83-LIF

N

GHD

HOOKER/RUCO SITE
HICKSVILLE, NEW YORK

MOST RECENT VCM
GROUNDWATER CONCENTRATION

Project No. 6883
Date December 2024

FIGURE 1

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HOOKER/RUCO SITE

NAVY SITE

PLANT 3

PLANT 25

NORTHROP

PLANT 5

PLANT 2

SITE

SLEEPY'S

SOUTH OYSTER BAY ROAD

MULBERRY DRIVE

HAZEL STREET

GRUMMAN ROAD

HICKSVILLE ROAD

MW-90D1 MW-90D2	Semi-Annual Semi-Annual	Annual Annual
MW-92D1 MW-92D2	Biennial Biennial	Annual Annual
MW-70D1 MW-70D2	Semi-Annual Semi-Annual	- Annual
MW-77D2	Semi-Annual	Annual
MW-82D1 MW-82D2	Semi-Annual Semi-Annual	- Annual
MW-72D1 MW-72D2	Semi-Annual Semi-Annual	- Annual
MW-76D1 MW-76D2 MW-76I	Semi-Annual Semi-Annual Annual	- Annual -
MW-86D1 MW-86D2	Semi-Annual Semi-Annual	Annual Biennial
MW-87D1 MW-87D2	Semi-Annual Semi-Annual	Annual Annual
MW-83D1 MW-83D2	Semi-Annual Semi-Annual	Annual Annual
MW-88D1 MW-88D2	Semi-Annual Semi-Annual	Annual Annual
MW-81D1 MW-81D2	Semi-Annual Semi-Annual	- Biennial
MW-61D2	Semi-Annual	Annual
MW-84D1 MW-84D2	Semi-Annual Semi-Annual	Annual Annual
MW-68D MW-68S	Semi-Annual Semi-Annual	Biennial -
MW-67S	Semi-Annual	Biennial
MW-58D MW-58D1 MW-58D2	Semi-Annual Semi-Annual Semi-Annual	Biennial Biennial Biennial
MW-59D2	Semi-Annual	Biennial

MW-93, MW-92, MW-70, MW-62, IW-3, IW-4, IW-5, IW-6, IW-7, IW-2, IW-1, MW-75, MW-77, MW-73, MW-90, MW-72, MW-76, MW-63, MW-82, IW-20, IW-21, IW-17, IW-18, IW-16, IW-19, IW-22, MW-86, IW-15, MW-87, MW-89, MW-85, MW-83, MW-61, MW-84, MW-88, MW-81, MW-60, MW-66, MW-68, MW-67, MW-58, MW-59, MW-3-1, WELL-3R, GP-3, GP-1

LEGEND

- MW-57 — EXISTING MONITORING WELL LOCATION
- GP-3 — FORMER EXTRACTION WELL LOCATION
- WELL-3R — CURRENT EXTRACTION WELL LOCATION
- IW-1 — EXISTING INJECTION WELL LOCATION
- VCM CONCENTRATION NON-DETECT FOR MORE THAN 3 YEARS
- VCM CONCENTRATION AT OR BELOW 2 µg/L OR NON-DETECT FOR LESS THAN 3 YEARS
- VCM CONCENTRATION ABOVE 2 µg/L
- µg/L — MICROGRAMS PER LITER

Well ID	Current Sampling Frequency	Proposed Revised Frequency
MW-58D	Semi-Annual	Biennial

0 200 400 ft

Coordinate System: NY83-LIF

N

GHD

HOOKER/RUCO SITE
HICKSVILLE, NEW YORK

INJECTION AND MONITORING WELL LOCATIONS

Project No. **6883**
Date **December 2024**

FIGURE 2

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Table 1

Monitoring Program Summary
Hooker Ruco Site
Hicksville, New York

Well ID	Date of Last Exceedence of VCM PS	Date of Last VCM Detection	Number of events since last VCM detection	Number of years since last VCM detection	Current Sampling Frequency	Proposed Revised Frequency
Well with VCM Concentration Currently Above Performance Standard						
MW-72D1	9/8/2024	9/8/2024	0	0	Semi-Annual	
MW-76D1	8/9/2024	8/9/2024	0	0	Semi-Annual	
MW-62I	11/2/2023	11/2/2023	0	0	Based on Observed	
MW-92D1	9/8/2024	9/8/2024	0	0	Biennial	Annual
Well with VCM Concentration Below Performance Standard for Less Than 3 Years						
MW-70D1	4/18/2024	8/9/2024	0	0	Semi-Annual	
MW-75D1	10/25/2022	8/9/2024	0	0	Semi-Annual	
MW-75D2	10/25/2022	4/18/2024	0	0	Semi-Annual	
MW-76I	1/24/2014	10/23/2023	0	0	Annual	
MW-81D1	4/21/2021	10/18/2021	8	3	Semi-Annual	
MW-82D1	5/12/2022	5/12/2022	4	2	Semi-Annual	
MW-89D1	4/19/2023	4/19/2023	2	1	Semi-Annual	
MW-89D2	4/23/2015	10/15/2021	5	3	Semi-Annual	
MW-63I	11/14/2014	10/29/2021	2	2	Annual	
MW-63D1	10/21/2014	10/14/2021	2	2	Annual	
MW-68S	5/10/2022	5/10/2022	4	2	Semi-Annual	
MW-93D1	10/23/2015	10/25/2023	0	0	Biennial	
Well with VCM Concentration Non-Detect for more than Three Years						
MW-61D2	5/2/2013	4/24/2015	19	9	Semi-Annual	Annual
MW-70D2	4/26/2013	10/24/2013	26	11	Semi-Annual	Annual
MW-72D2	never	7/21/2014	23	10	Semi-Annual	Annual
MW-73D2	7/24/2013	1/24/2014	17	10	Annual	
MW-76D2	1/24/2014	10/21/2014	22	10	Semi-Annual	Annual
MW-77D2	7/24/2013	10/23/2015	17	9	Semi-Annual	Annual
MW-81D2	10/14/2009	11/5/2012	26	12	Semi-Annual	Biennial
MW-82D2	10/26/2012	10/26/2012	23	12	Semi-Annual	Annual
MW-83D1	10/30/2014	11/6/2020	7	4	Semi-Annual	Annual
MW-83D2	11/30/2011	11/30/2011	28	13	Semi-Annual	Annual
MW-84D1	10/17/2007	12/1/2011	25	13	Semi-Annual	Annual
MW-84D2	1/28/2008	5/25/2010	28	14	Semi-Annual	Annual
MW-85D1	11/12/2018	4/23/2019	10	5	Semi-Annual	
MW-85D2	4/19/2021	4/19/2021	6	3	Semi-Annual	
MW-86D1	4/24/2015	4/24/2015	18	9	Semi-Annual	Annual
MW-86D2	never	7/17/2014	20	10	Semi-Annual	Biennial
MW-87D1	4/29/2014	4/29/2014	21	10	Semi-Annual	Annual
MW-87D2	11/15/2010	11/15/2010	30	14	Semi-Annual	Annual
MW-88D1	4/24/2015	4/20/2018	12	6	Semi-Annual	Annual
MW-88D2	5/13/2020	5/13/2020	8	4	Semi-Annual	Annual
MW-90D1	4/24/2015	10/19/2017	13	7	Semi-Annual	Annual
MW-90D2	1/23/2014	4/23/2014	21	10	Semi-Annual	Annual
MW-58D	never	never	22	29	Semi-Annual	Biennial
MW-58D1	never	never	22	29	Semi-Annual	Biennial
MW-58D2	never	never	20	29	Semi-Annual	Biennial
MW-59D2	never	never	19	29	Semi-Annual	Biennial
MW-62D	10/18/2017	10/18/2017	2	6	Based on Observed	
MW-63S	5/15/2014	5/15/2014	12	10	Annual	
MW-66D2	never	4/23/2019	6	5	Annual	
MW-67S	10/24/2014	11/5/2018	11	6	Semi-Annual	Biennial
MW-68D	5/19/2010	4/23/2015	18	9	Semi-Annual	Biennial
MW-92D2	never	never	8	14	Biennial	Annual
MW-93D2	never	10/18/2017	3	6	Biennial	

Table 2

Summary of Wells Propsed for Reduced Sampling Frequency
Hooker Ruco Site
Hicksville, New York

Well ID	Date of Last Exceedence of VCM PS	Date of Last VCM Detection	Number of events since last VCM detection	Number of years since last VCM detection	Current Sampling Frequency	Proposed Revised Frequency	Detection Limit for Last Four Sampling Events			
MW-61D2	5/2/2013	4/24/2015	19	9	Semi-Annual	Annual	1	1	2	2
MW-70D2	4/26/2013	10/24/2013	26	11	Semi-Annual	Annual	1	1	1	1
MW-72D2	never	7/21/2014	23	10	Semi-Annual	Annual	1	1.0/1.0	1	1
MW-76D2	1/24/2014	10/21/2014	22	10	Semi-Annual	Annual	1	1	1	1
MW-77D2	7/24/2013	10/23/2015	17	9	Semi-Annual	Annual	1	1	1	1
MW-81D2	10/14/2009	11/5/2012	26	12	Semi-Annual	Biennial	1	1	1	1
MW-82D2	10/26/2012	10/26/2012	23	12	Semi-Annual	Annual	1	1	1	1
MW-83D1	10/30/2014	11/6/2020	7	4	Semi-Annual	Annual	1	1	1	1
MW-83D2	11/30/2011	11/30/2011	28	13	Semi-Annual	Annual	1	2	4	4
MW-84D1	10/17/2007	12/1/2011	25	13	Semi-Annual	Annual	1	1	1	1
MW-84D2	1/28/2008	5/25/2010	28	14	Semi-Annual	Annual	1	1	1	1
MW-86D1	4/24/2015	4/24/2015	18	9	Semi-Annual	Annual	1	1	1.0/1.0	1
MW-86D2	never	7/17/2014	20	10	Semi-Annual	Biennial	1	5	1	2
MW-87D1	4/29/2014	4/29/2014	21	10	Semi-Annual	Annual	1	1	1.0/1.0	1
MW-87D2	11/15/2010	11/15/2010	30	14	Semi-Annual	Annual	1	1	2	5
MW-88D1	4/24/2015	4/20/2018	12	6	Semi-Annual	Annual	1	1	1	1
MW-88D2	5/13/2020	5/13/2020	8	4	Semi-Annual	Annual	1	1	1	1
MW-90D1	4/24/2015	10/19/2017	13	7	Semi-Annual	Annual	1	1	1	1
MW-90D2	1/23/2014	4/23/2014	21	10	Semi-Annual	Annual	1.0/1.0	1	1	1
MW-58D	never	never	22	29	Semi-Annual	Biennial	1	4	1	1
MW-58D1	never	never	22	29	Semi-Annual	Biennial	1	2	1	1
MW-58D2	never	never	20	29	Semi-Annual	Biennial	2.0/1.0	1	4	2
MW-59D2	never	never	19	29	Semi-Annual	Biennial	1	1	1	1
MW-67S	10/24/2014	11/5/2018	11	6	Semi-Annual	Biennial	1	1	1	1
MW-68D	5/19/2010	4/23/2015	18	9	Semi-Annual	Biennial	1	1	1	1
MW-92D2	never	never	8	14	Biennial	Annual	1.0/1.0	1	1	1