UPDATE for USEPA

HOOKER/RUCO FACILITY

HICKSVILLE, NEW YORK

November 4, 2009

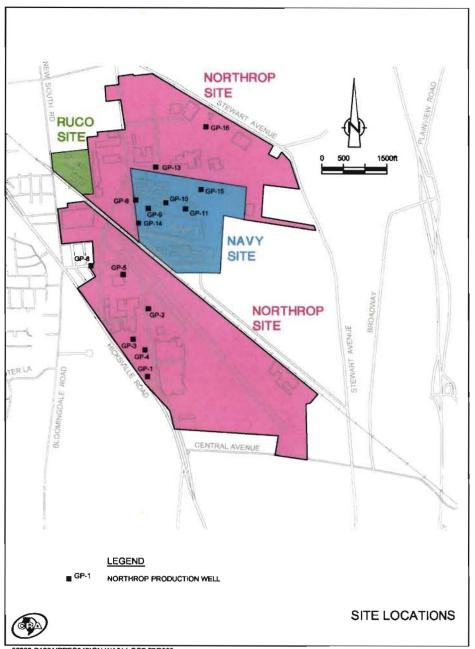
AGENDA

A - Site History / Background

B - Overview of Operable Units

C - Biosparge Remedy

Site History / Background



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Hooker/Ruco Site History

Site operated 1945 through 2002

OxyChem (and predecessors) operated 1945 through 1982

Three subsequent facility owners

Produced PVC (until 1975), polyesters, polyurethanes, and plasticizers

Major chemical of concern = Vinyl Chloride

Storm water and some process water historically discharged to on-Site sumps

Site Regulatory History

Superfund Site under USEPA lead NYSDEC & Nassau County receive updates Site studies performed throughout 1990s

Site Regulatory History

All On-Site remedies complete

All On-site remedies complete

 Bayer working with NYSDEC to close Site under RCRA Program

Off-Site remedy in implementation phase

- GSHI working with EPA to finalize groundwater remedy
- Cooperative effort with Northrop, Navy & GSHI

Operable Units

Operable Units

Three Operable Units for Site

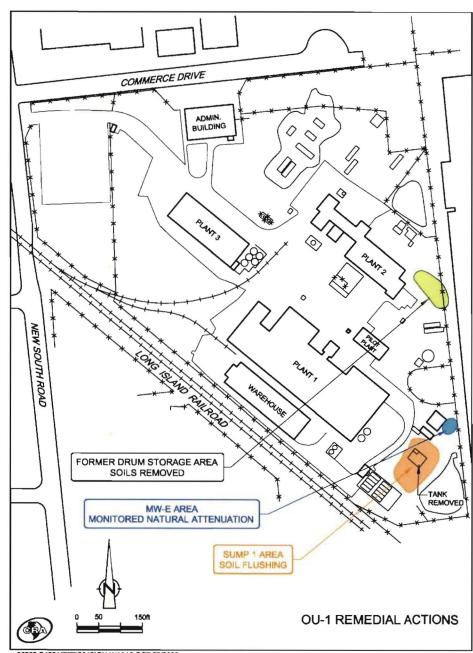
- OU1 for on-Site soil / groundwater
 - Complete
- OU2 for Therminol spill
 - Complete
- OU3 for off-Site groundwater
 - Ongoing

ROD Issued 1994

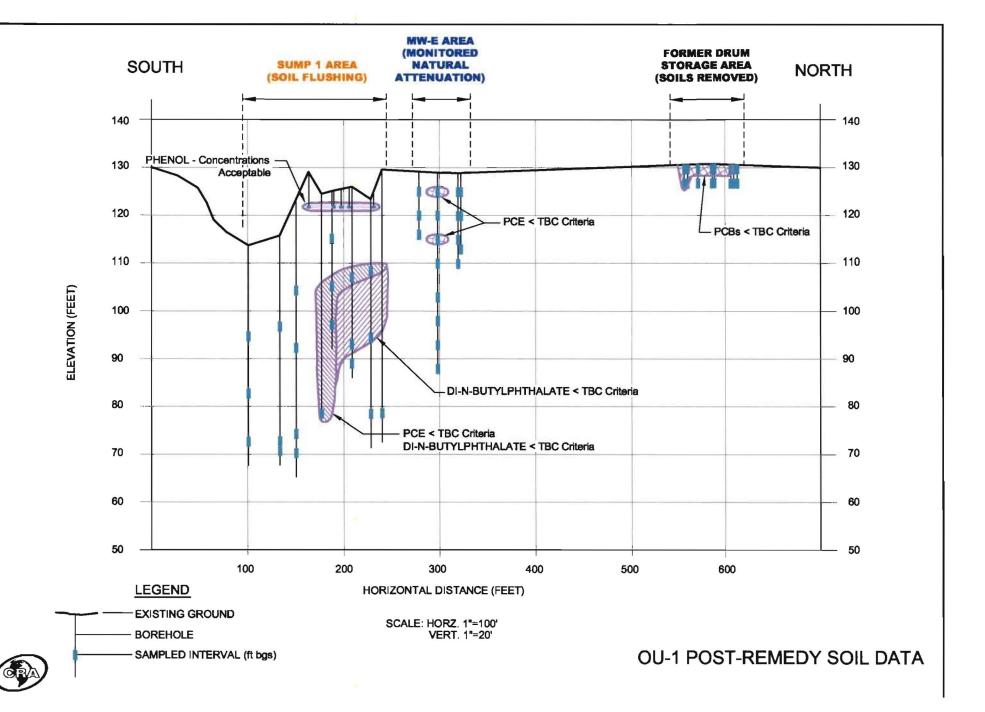
- Former storage areas and sumps (6)
- Received discharges from Plant including Vinyl Chloride
- Work completed in 2006
- USEPA approval issued Sept 28, 2007

Remedy

- Sump 1
 - Removed Concrete Tank (2000)
 - Soil Flushing
- Former Drum Storage Area
 - Excavated PCBs > 10 ppm
 - 220 cy
- MW-E Area
 - Monitored Natural Attenuation



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EPA concurs that the minimal on-Site chemical presence in groundwater can be addressed by OU-3 off-Site remedy

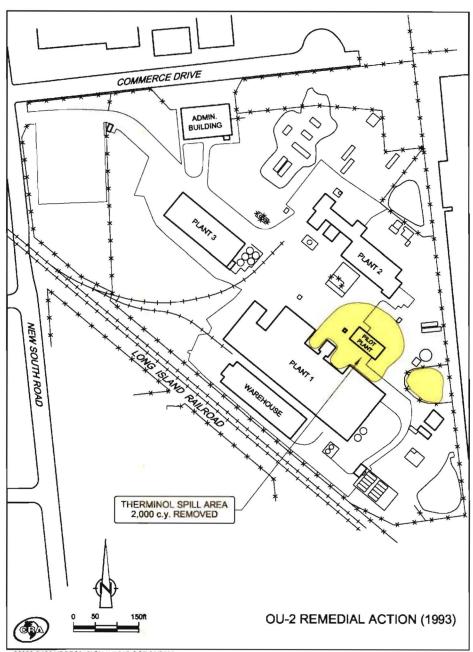
Bayer demolishing plant

NYSDEC and Bayer following RCRA closure procedures

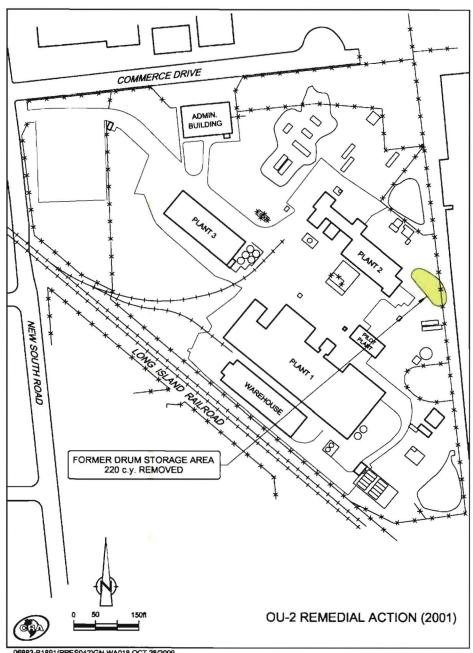
OU-2 Therminol Area

ROD issued 1991

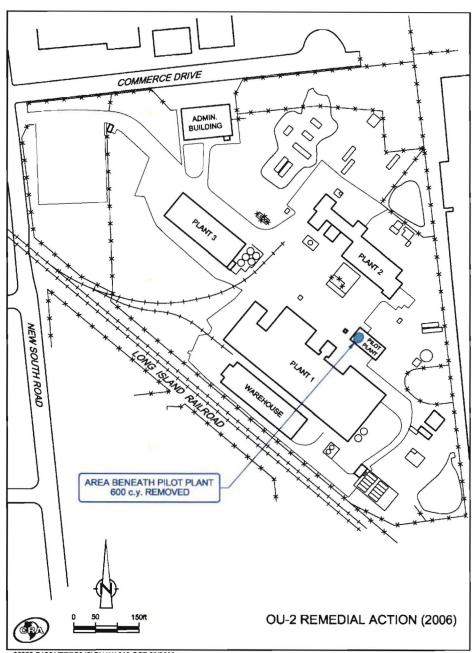
- Soil excavation & removal completed in 1993
 - 2000 cy removed
- Additional area identified & removed in 2001 under OU1
 - 220 cy removed
- Area under building became accessible in 2006
 - 600 cy removed
- All PCBs >10 ppm removed



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OU-3 Off-Site Groundwater

ROD Issued September 2000

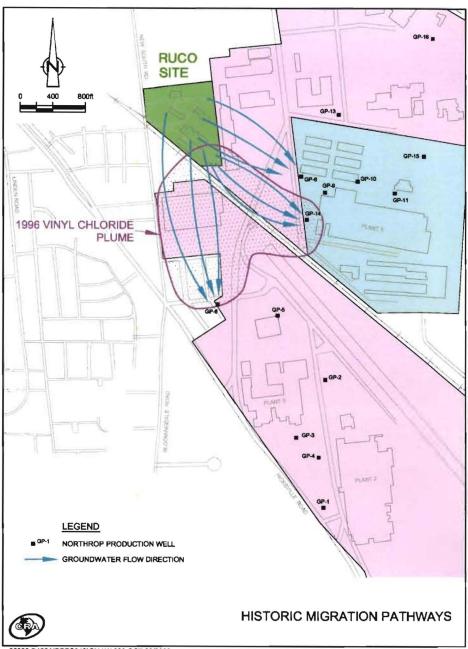
Remedy Selected

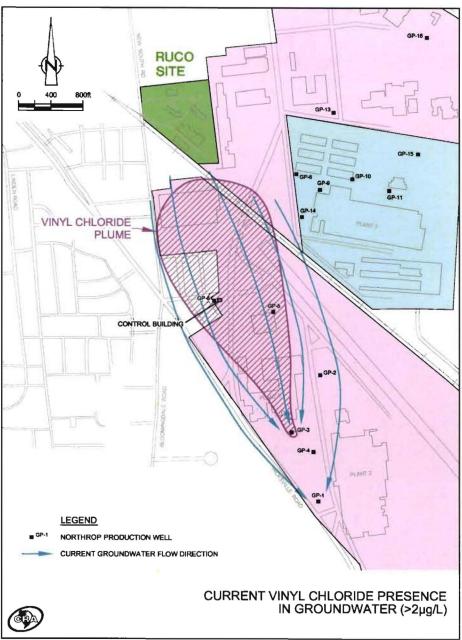
- Oxygen Injection (Biosparge) into the impacted groundwater layers
- Vinyl Chloride => Water, CO₂, chloride, ethenes, ethanes
- Pump & treat stipulated fall back

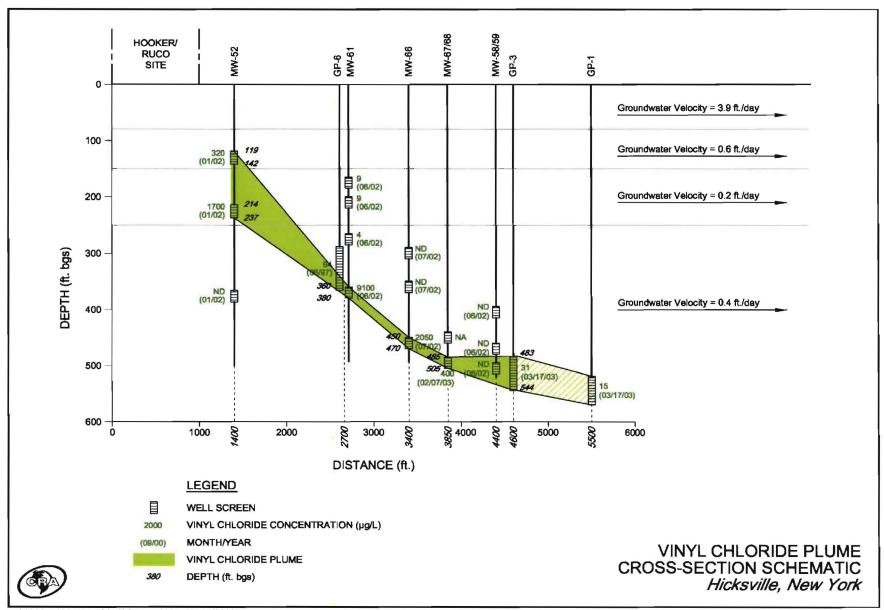
Studies have refined plume location, aerobic conditions, injection capabilities

OU-3 Off-Site Groundwater

- Flow is to the south but can be influenced by pumping
- Entire vinyl chloride plume is hydraulically contained by Northrop pumping system (GP-1 and GP-3)
- Historical rate of vinyl chloride migration 150 feet / year
- Vinyl chloride has been drawn to a depth of 550 feet due to pumping



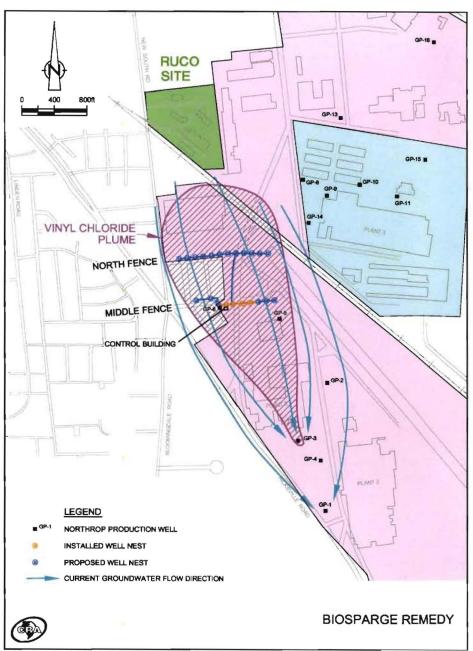


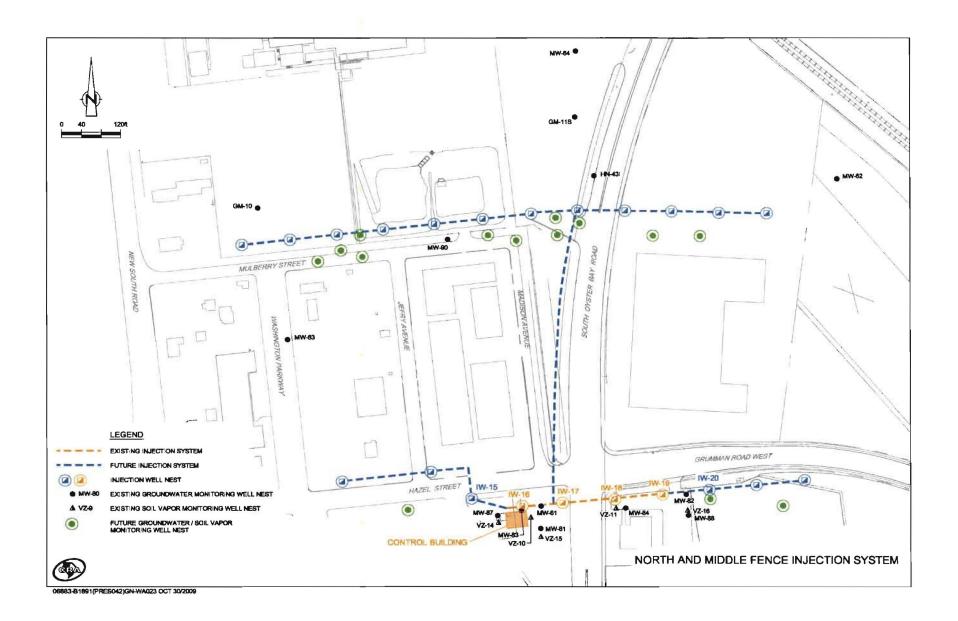


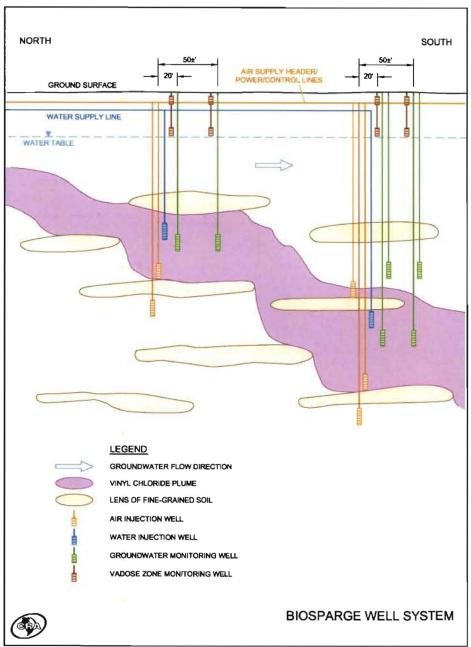
OU-3 Off-Site Groundwater

FINAL 100% Design Report - May 27 2005 Remedy Under Construction

- Phase 1 Injection and Monitoring System
 Constructed and Operating since October 2006
- Operating Parameters have been defined







Biosparge Remedy 0

EPA Comments

Effectiveness of Biodegradation

- Is oxygen being distributed?
- Is biodegradation occurring?
- Are chemicals being lifted to shallower depths ?

1 Oxygen Distribution

Goal for oxygen concentration to support biodegradation

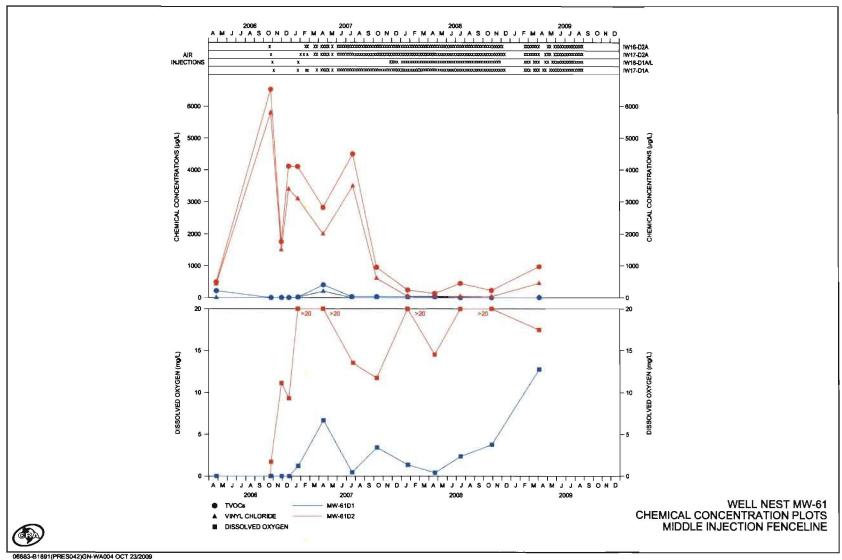
- 2 to 5 ppm
- >5 ppm ideal

Oxygen Concentrations in wells

- prior to injectionsaverage = 0.7 ppm
- current concentration average = 11.2 ppm

Oxygen Concentrations (ppm)

Well	Initial	Current	Well In	nitial (Current
MW-61 D1	0.0	12.8	MW-83 D2	2.0	20
MW-61 D2	0.0	17.5	MW-84 D1	0.0	13.3
MW-81 D1	0.0	0.0	MW-84 D2	2.7	10.2
MW-81 D2	0.0	10.6	MW-87 D1	0.0	8.6
MW-82 D1	0.0	5.4	MW-87 D2	1.6	9.9
MW-82 D2	0.0	>20	MW-88 D1	3.1	16.7
MW-83 D1	0.0	1.4	MW-88 D2	0.0	9.9



1 Oxygen Distribution

Oxygen delivery

- air injection
- water injection (from Northrop's treatment system)

Conclusions

- oxygen delivery is effective
- 100' spacing of injection wells is sufficient
- oxygen concentrations suitable for biodegradation

2 Chemical Reductions

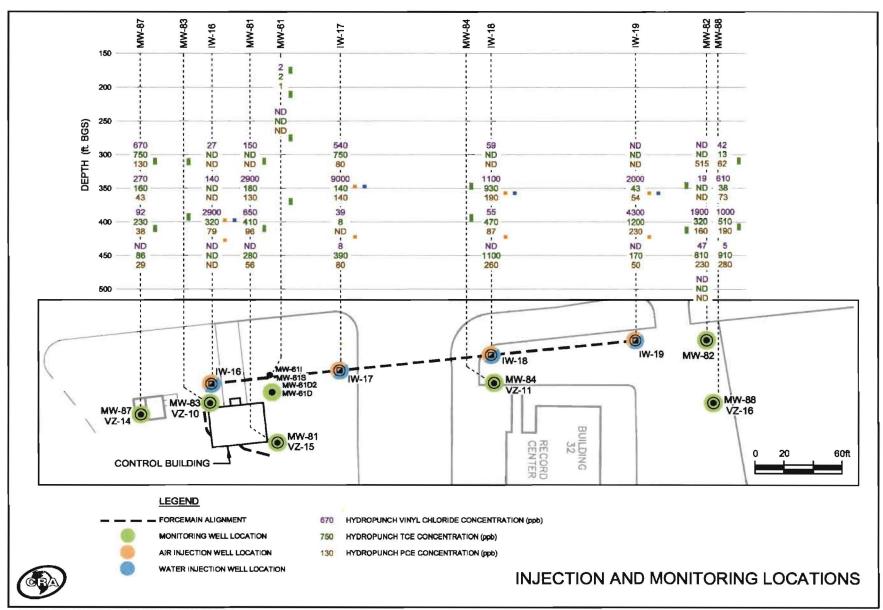
Initially some mixing effect following startup of oxygen / water injections

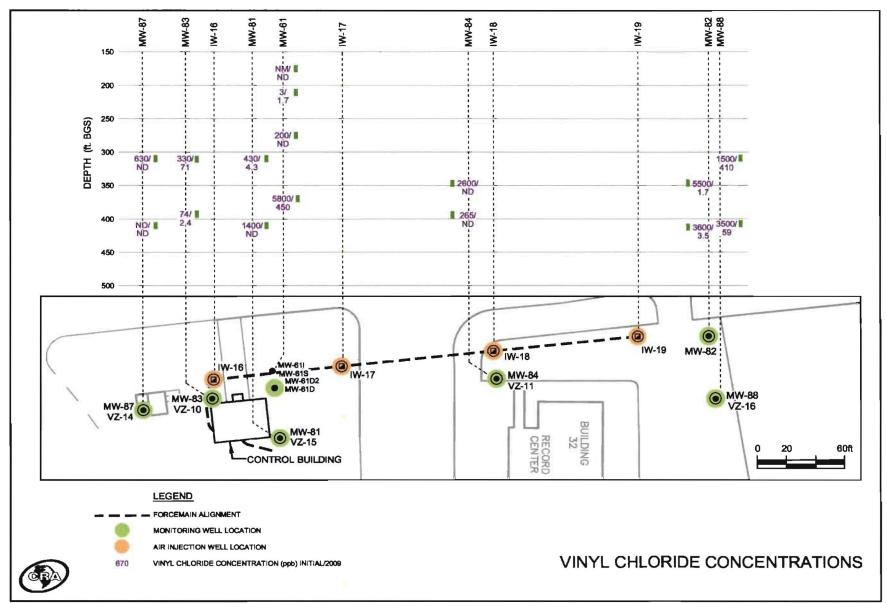
Vinyl Chloride concentrations reducing

- Initial Concentration Average = 1,845 ppb
- Current Concentration Average = 72 ppb
- Average reduction = 95%

Vinyl Chloride Concentrations (ppb)

Well I	nitial Current	Well In	itial (Current
MW-61 D1	200 ND	MW-83 D2	74	2.4
MW-61 D2	5,800 450	MW-84 D1	2,600	ND
MW-81 D1	430 4.3	MW-84 D2	265	ND
MW-81 D2	1,400 ND	MW-87 D1	630	ND
MW-82 D1	5,500 1.7	MW-87 D2	ND	ND
MW-82 D2	3,600 3.5	MW-88 D1	1,500	410
MW-83 D1	330 71	MW-88 D2	3,500	59





3 Vinyl Chloride Uplifting

Not into Vadose Zone

- Vinyl Chloride most prominent chemical in groundwater
- Only sporadically detected in vadose zone
 - highest current concentration 15 ppbv

Conclusion

 Vinyl Chloride is not being lifted into vadose zone

3 Vinyl Chloride Uplifting

Not being lifted into Shallower Groundwater Zones

- All 14 monitoring wells have lower vinyl chloride concentrations than prior to injections
- Confirmed at MW-61 which has three shallow wells

Conclusion

 Vinyl chloride is not being lifted into the shallower groundwater intervals

4 Microbial Populations

Aerobic microbial populations remain healthy

Increase of aerobic microorganisms specific to cis-1,2-dichloroethene

 same family of degraders as needed for vinyl chloride

5 Conclusions

Conditions needed for aerobic biodegradation are present

oxygen and microorganisms

Literature and lab studies confirm it will happen

No increase in shallow well concentrations No increase in vadose zone concentrations Conclusion - biodegradation is occurring