

US EPA ARCHIVE DOCUMENT



Gene Choquette  
Cincinnati Facility  
Site Manager

**Chevron Environmental  
Management Company**  
5000 State Route 128  
Cleveland, OH 45002  
Tel 513-353-1323  
Fax 513-353-4664

October 10, 2011

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Christopher Black  
USEPA Region 5  
Corrective Action Section 2  
Remediation and Reuse Branch, LU-9J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**Re: Third Quarter 2011 Progress Report, Chevron Cincinnati Facility**

Dear Mr. Black:

Chevron is submitting this quarterly progress report in accordance with Section 19.b of the November 2006 Administrative Order on Consent (AOC), for the time period from July 1 to September 30, 2011. The progress and status of the various activities performed for this time period are presented herein.

1. Chevron sent the following correspondence to the United States Environmental Protection Agency (USEPA) in the Third Quarter of 2011:
  - A letter dated July 12, 2011 presenting the Administrative Order on Consent Second Quarter 2011 Progress Report.
  - An email dated July 12, 2011 providing notification that the nested vapor wells in Hooven will be sampled the week of July 12<sup>th</sup> in accordance with the approved Operations, Monitoring, and Maintenance Plan (OMM Plan).
  - An email with an attachment dated July 27, 2011 providing an outline to the Five Year Corrective Measures Implementation Review as a follow up to a teleconference on July 25, 2011. Clarification regarding the submittal date for the report (November 30, 2011) and status of the high-grade recovery end-points was also provided with this email.
  - An email dated August 19, 2011 providing fluid level elevations with comparison to remedial system operational trigger levels, as well as notification regarding startup of high-grade pumping from production well PROD\_25 and the horizontal soil vapor extraction (HSVE) system, in accordance with the OMM Plan and 2006 AOC.
  - An email dated September 9, 2011 providing a tentative schedule for installation of the southern barrier wall near Gulf Park.

US EPA ARCHIVE DOCUMENT

- An email dated September 21, 2011 providing notification that the steel sheet piles for the southern barrier wall near Gulf Park had been installed and that final grading activities were in progress.
2. The USEPA did not conduct any additional correspondence activities during the Third Quarter of 2011.
  3. Other agency correspondence in the Third Quarter of 2011 included the following:
    - An email to Ohio EPA dated July 12, 2011 providing notification of a tentative groundwater sampling schedule for the Land Treatment Unit (LTU).
    - A letter to Hamilton County Environmental Services dated July 15, 2011 presenting the Semiannual Report (January 2011 through June 2011) for the Permit-to-Install and Operate Source P010 (HSVE system).
    - A letter to Hamilton County Environmental Services dated July 29, 2011 attaching the local Annual Air Permit Fee for Premise #: 1431080082 (Chevron Cincinnati Facility).
    - A letter from Ohio EPA dated July 27, 2011 presenting the results of the July 21, 2011 LTU compliance evaluation inspection.
    - An email from Hamilton County Department of Public Works dated July 28, 2011 providing a Special Flood Hazard Development Permit for the installation of the southern barrier wall near Gulf Park.
    - A letter from Ohio EPA dated August 29, 2011 presenting the results of the August 1, 2011 National Pollution Discharge Elimination System (NPDES) compliance evaluation inspection at the Chevron Cincinnati Facility (NPDES Permit 11G00000\*FD, OH0009326).
    - A letter to Ohio EPA dated September 7, 2011 providing a response to comments to the July 27, 2011 letter in which the Ohio EPA provided a summary of the results of the annual LTU inspection and required activities to maintain compliance with the post-closure permit. Chevron also provided a draft Maintenance Program and associated schedule as a request for a minor modification to the approved closure/post closure plan.
  4. Change of Management:
    - The Chevron site manager role has recently been transitioned from Mr. Blake Hall to me, Mr. Gene Choquette. In addition to the correspondence listed above, Change of Management notifications were sent on August 2, 2011 to USEPA Region 5, Ohio EPA, Ohio Department of Health, and Hamilton County Environmental Services.
  5. The following monitoring activities/field investigations were conducted in the Third Quarter of 2011:
    - Quarterly sampling of select monitoring wells in the Southwest Quadrant (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142) in accordance with the approved Work Plan for Contingency Measures in the Southwest Quadrant.
    - Bi-monthly groundwater gauging.

- Startup of the Gulf Park bioventing system on July 12, 2011.
- Startup of high-grade recovery operations utilizing PROD\_25 on August 30, 2011.
- Annual groundwater sampling of the LTU groundwater monitoring network.
- Annual monitoring of selected nested soil vapor monitoring wells in Hooven.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 in September 2011, when groundwater trigger elevations were reached in accordance with the amended flowchart titled *Supplemental Monitoring of Soil Vapor Conditions beneath Hooven, Chevron Cincinnati Facility, Hooven, Ohio*.
- Startup of the HSVE system on September 13, 2011 following the first monthly monitoring event.
- Annual groundwater monitoring in Gulf Park.
- Construction of the southern section of the barrier wall along the Great Miami River near Gulf Park began on September 7, 2011.

#### **Planned Activities – Fourth Quarter 2011**

1. The following monitoring and fieldwork activities are planned:
  - Continued operation and monitoring of the Gulf Park biovent systems.
  - Continued operation and monitoring of high-grade pumping from production well PROD\_25.
  - Continued operation and monitoring of the HSVE system.
  - Semiannual monitoring of the ROST transects in the Southwest Quad.
  - Quarterly groundwater sampling from selected monitoring wells in the Southwest Quad (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142) in accordance with the approved Work Plan for Contingency Measures in the Southwest Quadrant.
  - Bi-monthly groundwater gauging within the shallow monitoring network across the former refinery and Gulf Park.
  - Semiannual sampling from the barrier wall groundwater monitoring network installed along the west bank of the Great Miami River at the former refinery.
  - Monthly soil vapor monitoring in selected intervals in nested vapor monitoring wells VW-96 and VW-99 during operation of the HSVE system.
  - Semiannual monitoring from selected groundwater monitoring wells on the former refinery, Hooven, and the Southwest Quad in accordance with the OMM Plan.
  - Completion of grading activities and restoration of the riverbank along the southern barrier wall near Gulf Park.

Mr. Christopher Black  
October 10, 2011  
Page 4

- Installation of an interior and exterior groundwater monitoring well along the southern barrier wall near Gulf Park.
- Laboratory analysis, data management, and validation.
- Routine semiannual reporting including submittal of the first Five Year Corrective Measures Implementation Review on November 30, 2011.

We appreciate your continued engagement on this project. If you have any questions or require any additional information, please contact me at (713) 432-2631 or Matt Mitchell (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,



Gene Choquette – Site Manager  
Chevron Cincinnati Facility  
Chevron Environmental Management Company

500-017-014

cc: Jeffery Stark – OEPA