

US EPA ARCHIVE DOCUMENT



Paul F. Ryan
Cincinnati Facility
Site Manager

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

October 15, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher Black
U.S. EPA – Region 5
Corrective Action Section
Enforcement and Compliance Assurance Branch
77 West Jackson Blvd. LU-9J
Chicago, IL 60604-3590

Re: 3rd Quarter 2008 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), covering the time period from July 1, 2008 to September 30, 2008. The progress and status of the various activities performed for this time period are presented herein.

1. Chevron sent the following correspondence to the U.S. EPA in the 3rd quarter of 2008:
 - A letter dated July 11, 2008 summarizing the Administrative Order on Consent quarterly progress report.
 - A report dated July 11, 2008 summarizing the Soils and Sludges Remedy quarterly progress report.
 - A report dated September 10, 2008 presenting the Final Remedial Measures Work Plan for Sheet Pile Barrier and Bank Stabilization Along the Great Miami River.
 - A letter dated September 10, 2008 providing notification of the intent to abandon production wells in the Bank Stabilization project area.
 - A report dated September 17, 2008 presenting the Proposed Remedial Measures Work Plan for Sheet Pile Barrier Construction and Bank Stabilization at the East Bank of the Great Miami River, Gulf Park, Cleves, Ohio
2. The U.S. EPA was copied on the following correspondence submitted by Chevron to other parties in the 3rd quarter of 2008:
 - A report dated July 11, 2008 sent to Mr. John Barlage of Hamilton County Environmental

- Services presenting the quarterly report for the HSVE system.
- A report dated July 11, 2008 sent to Mr. John Barlage of Hamilton County Environmental Services presenting the semiannual report for the HSVE system.
 - A memo dated July 10, 2008 sent to the Chevron CAP members presenting the June monthly facility update.
3. Chevron received the following correspondence from the U.S. EPA and/or the Ohio EPA in the 3rd quarter of 2008:
 - A permit dated August 14, 2008 presenting Ohio EPA's approval for coverage under Ohio EPA General Permit OHC000003 Storm Water Associated with Construction Activity.
 - A letter dated August 25, 2008 presenting U.S. EPA's approval of the Remedial Measures Workplan for Sheet Pile Barrier and Bank Stabilization along the Great Miami River.
 - A letter dated September 15, 2008 presenting U.S. EPA's approval of the plugging and abandoning of wells in Bank Stabilization Project area.
 4. Work with the developers/owners/permitting agencies continued on issues associated with installing a storm water management system in portions of the Southwest Quadrant, and on institutional control issues.
 5. The following monitoring activities/field investigations were conducted in the 3rd quarter of 2008:
 - Bi-monthly groundwater monitoring.
 - Quarterly groundwater sampling of newly installed sentinel and POC wells.
 - Soil vapor monitoring in Hooven.
 - Soil vapor monitoring and vapor diffusion monitoring both in Hooven and site vapor wells.
 - Annual groundwater sampling at the Land Treatment Unit.
 6. The soils remedy project was largely completed in the 2nd quarter of 2007. However, remaining backfilling will be resumed later this year during dry conditions.
 7. The Gulf Park Bioventing system was started for seasonal operation on August 12, 2008.
 8. The Hooven HSVE system remained shut down. It will remain shut down during calendar year 2008, at U.S. EPA's direction.
 9. The water treatment system remained offline due to water levels remaining above the trigger level elevation.
 10. Lysimeters were installed at three onsite locations and one offsite location in September. Lysimeters will be used to collect soil moisture samples to support data collection for plume attenuation

calculations.

11. The construction of the Vernal Ponds was completed in September. SWMUs 7 and 8 were recontoured and ditches and ponds were built to facilitate the creation of the Vernal Ponds.
12. Chevron began tree clearing and site preparation for the River Bank Stabilization Project on September 15, and then began working within the river banks on September 22, after we received our Nationwide Permit approval from the Army Corps. To support the Nationwide Permit, Chevron received the following approvals and/or concurrences:
 - Concurrence from the US Fish and Wildlife Service on our endangered species surveys was received on August 5th. The surveys revealed that no endangered species were identified in the work areas
 - On August 19th, Chevron received Ohio EPA's approval of our Notice of Intent for coverage of the River Bank Stabilization project under our existing Storm Water Associated with Construction Activity permit.
 - On August 20th, Chevron received Hamilton County Department of Public Works' approval of our River Bank Stabilization work permit requests.
 - Concurrence from the Ohio Historic Preservation Office on our Cultural Resource Investigation was received on September 10th. The Investigation revealed that no cultural or historically significant structures were identified within the River Bank Stabilization project areas.

Planned Activities – 4th Quarter 2008

1. The following monitoring and fieldwork activities are planned:
 - Gulf Park system trigger level monitoring and operation.
 - Bi-monthly groundwater monitoring.
 - Quarterly groundwater monitoring of the newly installed sentinel and POC wells.
 - River observations.
 - Soil vapor monitoring in Hooven.
2. Final backfilling, surface contouring, and reseeded activities associated with the soils remedy project will continue.
3. The River Bank Stabilization Project work will continue. Work in the East Island Channel is anticipated to begin.
4. Laboratory analytical data and quality assurance information will continue to be evaluated.

Mr. Christopher Black
October 15, 2008
Page 4

We appreciate your continued support and assistance on this project. If you have any questions or require any additional information, please contact me at (925) 543-2954 or Chris Aneiros (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,



Paul F. Ryan – Site Manager
Chevron Cincinnati Facility
Chevron Environmental Management Company

By Chris Aneiros, Trihydro Corporation, as agent for
Chevron Environmental Management Company

500-017-011

cc: Harold O'Connell – OEPA