

US EPA ARCHIVE DOCUMENT



Blake Hall
Cincinnati Facility
Site Manager

**Chevron Environmental
Management Company**
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October 6, 2010

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: 3rd Quarter 2010 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 to September 30, 2010. 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 2010:
 - A letter dated July 1, 2010 to U.S. EPA presenting notification that the 1st 2010 semiannual ROST sampling of the transects in the southwest quad would be delayed until July 12, 2010.
 - A letter dated July 6, 2010 presenting the Administrative Order on Consent 2nd Quarter 2010 Progress Report.
 - An Email dated August 2, 2010 with the response to questions from U.S. EPA regarding the Scope of Work for the Use of Fluorescent LNAPL Tracer for Improving LNAPL Recovery Activities, Chevron Cincinnati Facility, Hooven.
 - An Email dated August 9, 2010 giving an update of fluid levels and notification that Chevron plans on starting high-grade pumping from newly installed production well PROD_25 in the central portions of the facility. Weekly fluid level summaries since July 22, 2010 were also attached. An update to water levels from MW-96 compared to trigger levels for the HSVE system was also provided.
2. The U.S. EPA sent the following correspondence to Chevron in the 3rd quarter of 2010:

- A letter dated July 7, 2010 providing concurrence to a letter from Chevron dated June 21, 2010 requesting abandonment of MW-45 at the facility and the requested island wells with the exception of well sets MW-47, MW-60, MW-65, and MW-74.
 - A letter dated September 30, 2010 providing comments regarding draft Environmental Covenants language that Chevron had submitted to U.S. EPA with a letter dated April 8, 2008.
3. Other agency correspondence in the 3rd quarter of 2010 included the following:
- A letter to Hamilton County Environmental Services dated July 6, 2010 presenting the Quaterly Report (April 2010 through June 2010) for the Permit to Operate T015 (735 MGAL external floating roof storage tank-70 Tank), Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Hamilton County Environmental Services dated July 6, 2010 attaching the local Annual Air Permit Fee for Premise #: 1431080082 Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Hamilton County Environmental Services dated July 14, 2010 presenting the Semiannual Report (January 2010 through June 2010) for the Permit-to-Install and Operate Source P010 (Hooven Horizontal Soil Vapor Extraction System), Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA and various local jurisdictions dated August 2, 2010 attaching revisions to the *Contingency Plan for Chevron Environmental Management Company, Chevron Cincinnati Facility, Hooven, Ohio*. The revisions were made to update contact information making it Revision 9 of the plan.
 - A letter to Hamilton County Environmental Services dated August 31, 2010 presenting notification of change of operations from thermal oxidation to catalytic oxidation treatment for the Permit-to-Install and Operate Source P010 (Hooven Horizontal Soil Vapor Extraction System), Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter from Ohio EPA dated September 22, 2010 presenting the results of the September 16, 2010 NPDES compliance evaluation inspection at the Chevron Cincinnati Facility, Hooven, Ohio, NPDES Permit IIG00000*FD, OH0009326.
4. The following monitoring activities/field investigations were conducted in the 3rd quarter of 2010:
- Semiannual monitoring of the ROST transects in the southwest quad.
 - Quarterly sampling of wells MW-138, MW-139, MW-140, MW-141, and MW-142 in the southwest quad.
 - Monthly sampling of select southwest quad wells (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142).
 - Bi-monthly groundwater gauging.
 - Quarterly sampling of the main site barrier wall groundwater monitoring network.
 - Installation of a new production well PROD_25 in the central plume area of the site, north of existing well PROD_12.

- Rehabilitation of production well PROD_24 in the eastern portion of Hooven.
- Rehabilitation and packer installation of production well PROD_19 in the western portion of the site.
- Startup of the Gulf Park bioventing system on July 28, 2010.
- Startup of High-Grade recovery operations utilizing PROD_25 on August, 9, 2010.
- Startup of the Hooven HSVE system on August 17, 2010.
- Demolition and removal of the northernmost above ground storage tank (70-Tank).
- Annual groundwater sampling of the RCRA Land Treatment Unit (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 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*.

Planned Activities – 4th Quarter 2010

1. The following monitoring and fieldwork activities are planned:
 - Gulf Park biovent systems monitoring.
 - Continued High-Grade pumping monitoring.
 - Semiannual monitoring of the ROST transects in the southwest quad.
 - Quarterly sampling of wells MW-138, MW-139, MW-140, MW-141, and MW-142 in the southwest quad.
 - Monthly sampling of select southwest quad wells (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142).
 - Bi-monthly groundwater gauging.
 - Quarterly sampling of the main site barrier wall groundwater monitoring network.
 - Monitoring of the Hooven HSVE system while in operation.
 - Semiannual monitoring of the site lysimeters, groundwater monitoring wells, and southwest quad monitoring well network.
 - Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 when groundwater trigger elevations are reached in accordance with the amended flowchart titled *Supplemental Monitoring of Soil Vapor Conditions beneath Hooven, Chevron Cincinnati Facility, Hooven, Ohio*.
2. Laboratory analytical data and quality assurance information will continue to be evaluated.

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We appreciate your continued engagement on this project. If you have any questions or require any additional information, please contact me at (713) 432-2633 or Matt Mitchell (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,

W. Blake Hall

Blake Hall – Site Manager
Chevron Cincinnati Facility
Chevron Environmental Management Company

500-017-013

cc: Harold O'Connell – OEPA