

US EPA ARCHIVE DOCUMENT



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January 15, 2010

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: 4th Quarter 2009 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 October 1, 2009 to December 31, 2009. 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 4th quarter of 2009:
 - A work plan dated October 1, 2009 for Contingency Measures in the Southwest Quadrant, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter dated October 15, 2009 presenting the Administrative Order on Consent quarterly progress report.
 - A letter dated October 28, 2009 regarding the July through September 2009 Quarterly Report for the Permit to Operate Source P010 – Hooven Horizontal Soil Vapor Extraction System.
 - A report dated December 23, 2009 titled “First 2009 Semiannual Monitoring Report, Chevron Cincinnati Facility, Hooven, Ohio.”
 - Emails dated October 5, 12, 19, 26, November 9, 16, 24, and 30, 2009 summarizing the Hi-Grade operations, and December 15, 2009 ending Hi-Grade and transitioning to gradient control.
 - Emails dated October 15 and 27, 2009 summarizing the startup and system updates for the Hooven Soil Vapor Extraction System.
 - An Email dated December 15, 2009 summarizing the November 9, 2009 Southwest Quad Analytical Results.

2. The U.S. EPA sent the following correspondence to Chevron in the 4th quarter of 2009:
 - An Email dated October 13, 2009 stating that the USEPA/ODH Q4 soil vapor sampling in Hooven was complete, and that MW-96 monitoring of field gas readings would continue until shutdown of the Hooven HSVE.
 - An Email dated November 24, 2009 stating that all USEPA/ODH work in Hooven was completed.
3. On May 8, 2009, the Ohio Department of Transportation provided permit approval for the installation of the State Route 128 storm sewer. Initial work began in mid-September within the Chevron property at the Great Miami River headwall, and progressed off-site to the west in November. The tunneling and installation segment under State Highway 128 was completed on November 25th. The construction phase of the project was completed by December 23, 2009. Additional O & M and final grading will take place in the 1st quarter of 2010.
4. The Gulf Park Bank Stabilization project began on October 1, 2009 with the construction of the northern barrier wall. Access had still not been obtained on the private southern property during the 4th quarter of 2009, so the southern barrier wall section could not be constructed. Construction efforts on the northern wall were completed by October 27, 2009. The groundwater monitoring network will be installed during the 1st quarter of 2010 while the ground is frozen and the area can be accessed by the drill rig with the least vegetative disruption.
5. The following monitoring activities/field investigations were conducted in the 4th quarter of 2009:
 - Quarterly sampling of the sentinel and POC wells in the southwest quad.
 - Monthly sampling of select southwest quad wells (MW-133, MW-35, MW-138 through MW-142).
 - Bi-monthly groundwater gauging.
 - Semiannual groundwater sampling of remedy monitoring wells, and the MNA component of the Barrier Wall network.
 - A Hooven soil vapor monitoring well sampling event was initiated on September 28, 2009, and completed on October 2.
 - Semiannual ROST investigation in transects 1-3 within the southwest quad, and near MW-96S.
6. Seasonal startup of the Gulf Park Bioventing system began on July 7, 2009. It has remained operational for the remainder of the reporting period.
7. Hi-Grade pumping operations started on August 19, 2009, with the startup of production well PROD_20 and the gradual ramping down of PROD_15 and PROD_24. PROD_20, PROD_24, PROD_19, and PROD_21 were utilized during the reporting period, with the exception of down time due to power failure or maintenance. As of shutdown on December 15, 2009, approximately 486.65 million gallons of water have been processed in the GAC, with 26,824 gallons of product recovered. PROD_15 and PROD_24 are currently running as hydraulic gradient control until further notice.
8. Operation of the Hooven HSVE system began on October 15, 2009 after the EPA Superfund Division

completed their last round of soil vapor sampling in Hooven and the southwest quad. The system remained online in conjunction with the High Grade Pumping event, except for a 5 hour power outage on December 9, 2009. The system operation was terminated on December 18, 2009.

Planned Activities – 1st Quarter 2010

1. The following monitoring and fieldwork activities are planned:
 - Gulf Park systems trigger level monitoring and operation, with possible shutdown in the 1st Quarter of 2010.
 - Bi-monthly groundwater monitoring.
 - Quarterly groundwater monitoring of the sentinel and POC wells.
 - Quarterly groundwater monitoring of the newly installed barrier wall monitoring wells.
 - Quarterly groundwater monitoring of the newly installed southwest quad monitoring wells.
 - Monthly groundwater monitoring of select southwest quad monitoring wells.
 - Barrier wall monitoring network installation along the Gulf Park river bank.
 - Storm water sewer O & M activities along State Hwy. 128 in the southwest quad.
2. Laboratory analytical data and quality assurance information will continue to be evaluated.

We appreciate your continued support and assistance on this project. If you have any questions or require any additional information, please contact me at (713) 432-2749 or Doug Lam (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,



Chris M. Aneiros – Site Manager
Chevron Cincinnati Facility
Chevron Environmental Management Company

500-017-012

cc: Harold O'Connell – OEPA