

US EPA ARCHIVE DOCUMENT



Blake Hall
Cincinnati Facility
Site Manager

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

January 7, 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: 4th 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 October 1 to December 31, 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 4th quarter of 2010:
 - A letter dated October 6, 2010 presenting the Administrative Order on Consent 3rd Quarter 2010 Progress Report.
 - An email dated October 11, 2010 providing the draft Hooven soil vapor summary tables for August 2010, for samples collected from selected intervals in nested wells VW-93, VW-96, VW-99, VW-128, and VW-129 prior to startup of the HSVE system.
 - An email with attached letter dated October 27, 2010 requesting a reduction in groundwater sample analysis for monitored natural attenuation parameters at the barrier wall monitoring network.
 - A letter dated October 28, 2010 providing a response to comments made by the U.S. EPA regarding the draft environmental covenants for the Chevron Cincinnati Facility.
 - A conference call on October 28, 2010 to discuss attempts to gain access with the property owner (Jurgensen Gravel) and install the southern portion of the barrier wall in Gulf Park.
 - An email dated November 13, 2010 providing the draft soil vapor summary tables for September

2010, for samples collected from selected intervals in nested wells VW-96 and VW-99, during operation of the HSVE system.

- An email dated November 18, 2010 followed by a formal request letter dated November 24, 2010 requesting to abandon Near Slab Vapor Monitoring Wells in Hooven, Ohio.
 - An email dated November 22, 2010 providing electronic copies of 2nd and 3rd Quarter 2010 AOC Progress Reports.
 - A copy of a letter to Jackie Jurgensen dated December 9, 2010 requesting access to Jurgensen Gravel Company owned property for installation of river bank stabilization measures near Gulf Park in Cleves, Ohio.
 - An email dated December 15, 2010 providing an electronic copy of the Second 2009 Semi-Annual Monitoring Report.
2. The U.S. EPA sent the following correspondence to Chevron in the 4th quarter of 2010:
- An email dated October 27, 2010 asking if Chevron reached an agreement with the property owner (Jurgensen Gravel) to gain access and install the southern portion of the barrier wall in Gulf Park.
 - A conference call on October 29, 2010 informing Chevron that they will need to collect at least one additional round of natural attenuation indicators from the barrier wall monitoring network during low water table conditions before discontinuing monitoring for natural indicators of intrinsic biodegradation.
 - An email dated November 22, 2010 requesting electronic copies of the 2nd and 3rd Quarter 2010 AOC Progress Reports.
 - An email dated December 2, 2010 followed by a formal approval letter dated December 2, 2010 approving Chevron's request to abandon near slab vapor monitoring wells in Hooven, Ohio.
 - An email dated December 15, 2010 requesting an electronic copy of the Second 2009 Semi-Annual Monitoring Report.
3. Other agency correspondence in the 4th quarter of 2010 included the following:
- A letter to Hamilton County Department of Environmental Services dated October 6, 2010 presenting the Quaterly Report (July 2010 through September 2010) for the Permit to Operate T015 (735 MGAL external floating roof storage tank-70 Tank) and notification of demolition of the tank.
 - A letter from Ohio EPA dated October 14, 2010 presenting the results of the October 6, 2010 Land Treatment Unit (LTU) inspection at the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA dated November 15, 2010 providing a response to comments made by Ohio EPA in their October 14, 2010 letter presenting the results of the October 6, 2010 Land Treatment Unit (LTU) inspection at the Chevron Cincinnati Facility, Hooven, Ohio.
 - An email from Ohio EPA dated November 22, 2010 responding to Chevron's response to

comments letter dated November 15, 2010 regarding the Land Treatment Unit (LTU) addresses Ohio EPA concerns.

- A letter to Ohio EPA dated December 1, 2010 attaching the Annual Discharge Fee for NPDES Permit No. 1IG00000 Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to the Hamilton County Department of Environmental Services dated December 17, 2010 presenting the 2010 Annual Report for Equipment in Liquid Service (visual inspection checklist, and fugitive emissions survey), Chevron Cincinnati Facility, Hooven, Ohio.
4. The following monitoring activities/field investigations were conducted in the 4th quarter of 2010:
- Semiannual monitoring of the ROST transects in the Southwest Quad.
 - Semiannual groundwater sampling of monitoring wells and lysimeters as stipulated in OMM Plan.
 - 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) was discontinued in October 2010 and switched to quarterly sampling in accordance with the *Work Plan for Contingency Measures in the Southwest Quadrant*.
 - Bi-monthly groundwater gauging.
 - Quarterly sampling of the main site barrier wall groundwater monitoring network.
 - Installation of system automation components for the pump and treat system.
 - LNAPL tracer testing activities were conducted within selected monitoring wells in the central portions of the Chevron Cincinnati Facility in October 2010.
 - Abandonment of the island groundwater monitoring wells with the exception of nested wells MW-47, MW-60, MW-65, and MW-74 was completed in October 2010 in accordance with the U.S. EPA approval letter dated July 7, 2010.
 - Collection of soil samples for completion of a risk assessment to support redevelopment of parcels in the Southwest Quad occurred between October and December 2010.
 - Completion of soil boring installation and soil sampling to evaluate remedial progress and support evaluation of corrective measures implementation in Gulf Park was conducted in October 2010.
 - Collection of LNAPL samples from production well PROD_25 and monitoring well MW-20S to assess degradation in smear zone was performed in November 2010.
 - Collection of LNAPL samples from monitoring well MW-96S was completed in December 2010 to assess degradation trends in smear zone beneath Hooven.
 - Continuation of the Gulf Park bioventing system operation which started on July 28, 2010.

- Biovent system performance monitoring was performed in October and November 2010.
- High-grade recovery operations which started on August 9, 2010 switched from PROD_25 to PROD_24 and PROD_19 on November 30, 2010. A total of 132,500 gallons of LNAPL was recovered from PROD_25.
- The Hooven HSVE system was started on August 17, 2010 and continued through the end of the quarter.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 during operation of the HSVE system in accordance with the amended flowchart titled *Supplemental Monitoring of Soil Vapor Conditions beneath Hooven, Chevron Cincinnati Facility, Hooven, Ohio*.
- Abandonment of several near slab vapor monitoring wells in Hooven, Ohio.

Planned Activities – 1st Quarter 2011

1. The following monitoring and fieldwork activities are planned:
 - Gulf Park biovent system operation.
 - Continued high-grade recovery and monitoring.
 - Quarterly groundwater sampling from wells MW-138, MW-139, MW-140, MW-141, and MW-142 in the Southwest Quad.
 - Quarterly groundwater sampling of select Southwest Quad wells (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142).
 - Bi-monthly fluid level gauging.
 - Operation and monitoring of the HSVE system.
 - Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 during operation of the HSVE system.
 - Abandonment of near slab vapor monitoring wells in Hooven, Ohio.
2. Laboratory analytical data and quality assurance will continue to be evaluated.

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,



Blake Hall – Site Manager
Chevron Cincinnati Facility

Mr. Christopher Black
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Chevron Environmental Management Company

500-017-013

cc: Harold O'Connell – OEPA