

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

April 11, 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: 1st 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), covering the time period from January 1 to March 31, 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 1st quarter of 2011:
 - An email dated January 6, 2011 providing a consolidated property legal description for the institutional control deed recordation.
 - A letter dated January 7, 2011 presenting the Administrative Order on Consent 4th Quarter 2010 Progress Report.
 - An email with attached letter dated January 17, 2011 requesting to abandon vapor monitoring well VW-99A (5 and 10-foot intervals) located at 301 Chidlaw Ave. in Hooven, Ohio due to accessibility issues.
 - An email with attached table dated January 18, 2011 providing historical analytical results for nested vapor monitoring wells VW-99A and VW-99.
 - An email with attached spreadsheets dated January 24, 2011 providing an update to the final remedy cost estimate and a list of significant changes for the Chevron Cincinnati Facility.
 - An email dated January 27, 2011 notifying the USEPA that a change in the supplier for

groundwater and soil analytical services was being considered for the Chevron Cincinnati Facility.

- An email with attachments dated February 2, 2011 providing Performance Evaluation Sample documentation for ALS Laboratory Group located in Cincinnati, Ohio.
 - An email dated March 3, 2011 informing the USEPA of the completion of high-grade pumping on February 28, 2011. This email also provided (1) a summary of the high grade end points for this event, (2) the groundwater, LNAPL, and vapor recovery estimates for the 2010 through 2011 high-grade event, and (3) analytical summary tables for soil vapor monitoring completed using the nested wells in Hooven between August 2010 and January 2011
 - An email dated March 4, 2011 responding to questions sent by Chris Black regarding the status of obtaining access to install the river bank stabilization measures along the east bank of the Great Miami River immediately south of Cleves Community Park (formerly Gulf Park).
 - A copy of a letter to Jackie Alf dated March 7, 2011 providing additional information requested by Ms. Alf, as well as another request for access to Jurgensen Gravel Company owned property for installation of river bank stabilization measures immediately south of Cleves Community Park.
 - A report dated March 18, 2011 presenting the First 2010 Semiannual Monitoring Report, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter dated March 18, 2011 providing the following financial assurance documents: Financial Test Letter, Corporate Guarantee for Corrective Action, 2010 Chevron Form 10-K, Accountant's Special Report, and Bond Rating Information for the Chevron Cincinnati Facility, Hooven, Ohio.
2. The USEPA conducted the following activities during the 1st quarter of 2011:
- A phone call on January 10, 2011 from Chris Black requesting further information regarding the procedures for near slab well abandonment activities in Hooven.
 - An email dated January 18, 2011 followed by a letter approving Chevron's request to abandon nested vapor well VW-99A (5 and 10-foot intervals) located at 301 Chidlaw Ave. in Hooven, Ohio due to accessibility issues.
 - An email dated January 27, 2011 discussing the transition to Analytical Laboratory Services, Inc. (Cincinnati, Ohio) for laboratory analysis of soil and groundwater samples collected at the Chevron Cincinnati Facility as well as the certifications and performance sampling currently completed by this laboratory. A request was also made for accreditation documentation for additional analytes.
 - An email dated February 10, 2011 providing comments on ALS Laboratory Group Performance Evaluation Sample results.
 - A conference call on February 11, 2011 between the ALS Laboratory Group, Trihydro, and USEPA discussing the Performance Evaluation Sample results and additional documentation necessary to support a change in the supplier for groundwater and soil analytical services for the Chevron Cincinnati Facility.

- An email dated March 4, 2011 requesting the status of Chevron's attempts to reach an agreement with Jackie Alf for access to the Jurgensen Gravel Company owned property to install the river bank stabilization measures along the east bank of the Great Miami River immediately south of Cleves Community Park.
3. Other agency correspondence in the 1st quarter of 2011 included the following:
- A letter to Ohio EPA dated January 12, 2011 providing the July through December 2010 Semiannual Report 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 dated January 14, 2011 providing an explanation of the detection of oil and grease exceeding the daily loading discharge limit and corrective actions taken for the NPDES outfall at the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio Department of Natural Resources dated January 19, 2011 providing the State of Ohio Water Withdrawal Facility Registration Annual Report Form, Year ending December 31, 2010, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to the Hamilton County Department of Environmental Services dated February 3, 2011 presenting a copy of the 2010 Annual Permit Evaluation Report (PER) for Permit to Install and Operate Sources P010 and T018, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA dated February 8, 2011 presenting the 2010 Annual Hazardous Waste Report for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA State Emergency Response Commission dated February 22, 2011 providing the 2010 facility identification forms, chemical inventory forms, facility maps and attachments for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA State Emergency Response Commission dated February 22, 2011 providing the 2010 chemical inventory report fee for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A report to the Ohio EPA dated February 25, 2011 titled "2010 Annual Groundwater Monitoring Report, RCRA Land Treatment Unit, Chevron Cincinnati Facility, Hooven, Ohio, Facility I.D. OHD004254132."
 - A letter to Ohio EPA dated March 18, 2011 providing Financial Assurance for Closure and Post-Closure Care and Liability Coverage for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA dated March 30, 2011 providing the Cost Estimate for the Land Treatment Unit as a supplement to the Financial Assurance for Closure and Post-Closure Care and Liability Coverage letter dated March 18, 2011 for the Chevron Cincinnati Facility, Hooven, Ohio.
4. The following monitoring activities/field investigations were conducted in the 1st quarter of 2011:
- Abandonment of near slab vapor wells at all but one property was completed in Hooven by January 28, 2011.
 - Abandonment of nested vapor well VW-99A (5 and 10-foot intervals) located at 301 Chidlaw Ave. in Hooven, Ohio was completed on January 28, 2011.

- The horizontal soil vapor extraction (HSVE) system extending beneath Hooven was started on August 17, 2010. Due to sustained groundwater elevations above trigger levels, HSVE system operation was suspended on February 21, 2011.
- The Gulf Park Bioventing system was shut down on February 22, 2011. The system has remained off for the remainder of the reporting period due to groundwater levels above the operation trigger elevation.
- High-grade recovery which started on August 9, 2010 operated using the following production wells over the course of the event:
 - PROD_25 from August 9 to November 29, 2010
 - PROD_19 and PROD_24 from November 29, 2010 to January 7, 2011
 - PROD_20 and PROD_25 from January 7 to January 19, 2011
 - PROD_25 from January 19 to February 28, 2011 when the high-grade recovery event was terminated due to reduced LNAPL recovery and a rebound in groundwater elevations in accordance with high-grade pumping end-points.

The biological granulated activated carbon (GAC) wastewater treatment system was placed in standby mode until the next high-grade recovery event. A total of 144,000 gallons of LNAPL was recovered during this event.

- LNAPL tracer testing activities were conducted within selected monitoring wells in the central portions of the Chevron Cincinnati Facility in February 2011.
- Quarterly sampling of select Southwest Quad monitoring wells (MW-35, MW-120, MW-133, MW-138 through MW-140, and MW-142) was completed on March 23, 2011.
- Bi-monthly fluid level gauging was performed across the facility, Hooven, Southwest Quad, and Gulf Park on January 27 and March 18, 2011..
- Brush removal along the perimeter fence as well as re-grading and re-seeding of low spots was completed at the Land Treatment Unit in March 2011. These activities were performed in response to OEPA inspections and involved hauling in clean fill and the use of heavy equipment on the LTU surface.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 during operation of the HSVE system was completed on February 28, 2011 in accordance with the amended flowchart titled “Supplemental Monitoring of Soil Vapor Conditions beneath Hooven, Chevron Cincinnati Facility, Hooven, Ohio”..

Planned Activities – 2nd Quarter 2011

1. The following monitoring and fieldwork activities are planned:
 - Quarterly groundwater sampling of select Southwest Quad wells (MW-120, MW-133, MW-35, MW-138 through MW-140, and MW-142).

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- Bi-monthly fluid level gauging.
- Gulf Park systems trigger level monitoring.
- Semiannual groundwater monitoring of the main-site barrier wall monitoring wells.
- Semiannual groundwater monitoring of the Southwest Quad point of compliance and sentinel monitoring well network.
- Annual groundwater monitoring of the Gulf Park monitoring wells and northern barrier wall monitoring wells.
- Semiannual groundwater monitoring of the lysimeters, facility, Hooven, and Southwest Quad monitoring wells.
- Collection of soil samples from the former north tank farm and marketing terminal for the purpose of assessing risk for future redevelopment of these parcels at the Chevron Cincinnati Facility.
- Laboratory analysis, data management, and validation.

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
Chevron Environmental Management Company

500-017-014

cc: Harold O'Connell – OEPA