

US EPA ARCHIVE DOCUMENT



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January 9, 2012

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: Fourth 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), for the time period from October 1 to December 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 fourth quarter of 2011:
  - A report dated September 30, 2011 presenting the Second 2010 Semiannual Monitoring Report, Chevron Cincinnati Facility, Hooven, Ohio.
  - A letter dated October 10, 2011 presenting the Administrative Order on Consent Third Quarter 2011 Progress Report.
  - A phone call on October 14, 2011 providing notification that the southern barrier wall near Gulf Park had been installed and that final grading activities were completed on Friday October 7<sup>th</sup>, 2011. In addition, Chevron provided an update regarding seasonal high-grade recovery operations and requested the status of USEPA's review of the *Proposed Criteria for Discontinuing High-Grade LNAPL Recovery under the Final Groundwater Remedy* letter and the *Second Request for a Reduction in Groundwater Sample Collection for Monitored Natural Attenuation (MNA) Indicators at the Barrier Wall Monitoring Network* letter.
  - A phone call on November 9, 2011 providing notification that due to high groundwater table elevations, the horizontal soil vapor extraction (HSVE) system was shut down on November 1<sup>st</sup> and the high-grade recovery system was shut down on November 7<sup>th</sup>. USEPA provided an update of their review of the *Second Request for a Reduction in Groundwater Sample Collection for Monitored Natural Attenuation (MNA) Indicators at the Barrier Wall Monitoring Network* letter

and Chevron detailed the status of the 5-Year Groundwater Corrective Measures Implementation Review.

- An email dated November 22, 2011 providing notification that the biologically enhanced granular activated carbon treatment system was taken out of standby mode due to continuous high groundwater elevations above pumping trigger levels. USEPA requested tabulated results of the Hooven vapor monitoring results once available.
  - A report dated November 29, 2011 presenting the Five-Year Groundwater Corrective Measures Implementation Review, Chevron Cincinnati Facility, Hooven, Ohio.
2. The USEPA conducted the following correspondence activities during the fourth quarter of 2011.
- An email dated December 1, 2011 approving Chevron's request to discontinue groundwater sample collection and analysis for MNA indicators from the on-site barrier monitoring well network.
3. Other agency correspondence in the fourth quarter of 2011 included:
- A letter from the Ohio EPA dated October 3, 2011 providing a draft copy of the National Pollutant Discharge Elimination System (NPDES) Permit renewal for the Chevron Cincinnati Facility, Hooven, Ohio. The letter stated that the draft permit has been submitted for a 30-day public comment period.
  - A letter from the Ohio EPA dated October 6, 2011 providing approval to Chevron's request for a minor modification to the approved closure/post closure plan including the post closure maintenance/inspection program and schedule.
  - A report from Ohio EPA dated October 24, 2011 presenting the results of the October 17 and 18, 2011 bioassay screening for acute toxicity for samples collected from the Chevron treatment wetlands outfall (Outfall No. 003) as part of a toxics evaluation in conjunction with the NPDES permit reissuance.
  - A letter to Ohio EPA dated November 22, 2011 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 14, 2011 presenting the 2011 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 fourth quarter of 2011:
- Semiannual monitoring of the ROST transects in the Southwest Quad.
  - Semiannual groundwater sampling of monitoring wells as stipulated in OMM Plan.
  - Sampling of groundwater monitoring wells MW-35, MW-120, MW-133, MW-138, MW-139, MW-140, MW-141, and MW-142 in the Southwest Quad.
  - Bi-monthly fluid level gauging.

- Semiannual sampling of the main site barrier wall groundwater monitoring network.
- Continuation of the Gulf Park bioventing system operation which started on July 12, 2011 and shut down on November 15, 2011 due to groundwater levels above the operational trigger elevations.
- High-grade recovery operations which started on August 30, 2011 utilizing production well PROD\_25. High-grade pumping was shut down on November 7, 2011 due to groundwater levels above operational trigger levels. Approximately 1,000 gallons of light non-aqueous phase liquid (LNAPL) was recovered during this high-grade event.
- The HSVE system was started on September 13, 2011. The HSVE system operation was suspended on November 1, 2011 due to groundwater levels above operational trigger levels.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 during operation of the HSVE system in October 2011. This monitoring was performed in accordance with the amended flowchart titled *Supplemental Monitoring of Soil Vapor Conditions beneath Hooven, Chevron Cincinnati Facility, Hooven, Ohio*.
- Construction of the southern section of the barrier wall along the Great Miami River near Gulf Park began on September 7, 2011 and was completed on October 7, 2011.

#### **Planned Activities – First Quarter 2012**

1. The following monitoring and fieldwork activities are planned:
  - Bi-monthly groundwater gauging within the shallow monitoring network across the former refinery and Gulf Park in January and March.
  - Installation of an interior and exterior groundwater monitoring well along the southern barrier wall near Gulf Park.
  - Routine semiannual reporting including submittal of the First 2011 Semiannual Monitoring Report.
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) 432-2631 or Matt Mitchell (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,



Gene Choquette – Site Manager  
Chevron Cincinnati Facility  
Chevron Environmental Management Company

cc: Jeffery Stark – OEPA