

US EPA ARCHIVE DOCUMENT



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April 4, 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: First Quarter 2012 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 January 1 to March 31, 2012. 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 first quarter of 2012:
 - An email with attached table dated January 5, 2012 providing the results of the draft soil vapor monitoring results from nested wells VW-96 and VW-99 during operation of the horizontal soil vapor extraction (HSVE) system during the second half of 2011.
 - A letter dated January 9, 2012 presenting the Fourth Quarter 2011 AOC Progress Report.
 - A phone call and email dated January 9, 2012 discussing arrangements for a meeting at USEPA Region 5 headquarters on March 1, 2012 to discuss the findings and recommendations provided within the Five Year Corrective Measures Implementation Review.
 - An email with attached spreadsheets dated January 30, 2012 providing an update to the final remedy cost estimate and a list of significant changes for the Chevron Cincinnati Facility.
 - An email dated February 24, 2012 providing a draft agenda for the meeting at USEPA Region 5 headquarters on March 1, 2012.
 - An email dated March 23, 2012 providing electronic copies of the Second, Third, and Fourth Quarter 2011 AOC Progress Reports.
 - A letter dated March 23, 2012 providing the following financial assurance documents: Financial Test Letter, Corporate Guarantee for Corrective Action, 2011 Chevron Form 10-K, Accountant's Special Report, and Bond Rating Information for the Chevron Cincinnati Facility, Hooover, Ohio.

- A report dated March 28, 2012 presenting the First 2011 Semiannual Monitoring Report, Chevron Cincinnati Facility, Hooven, Ohio.
2. The USEPA provided the following correspondences during the first quarter of 2012.
 - An email dated March 22, 2012 requesting electronic copies of the Second, Third, and Fourth Quarter 2011 AOC Progress Reports.
 3. Meetings between Chevron and USEPA conducted during the first quarter of 2012.
 - Chevron met with the USEPA Region 5 to discuss the findings and recommendations provided within the Five Year Corrective Measures Implementation Review on March 1, 2012. The meeting primarily focused on the remedy progress to date as well as future activities and agency expectations.
 4. Other agency correspondence in the first quarter of 2012 included:
 - A letter from the Ohio EPA dated January 5, 2012 providing the approved National Pollutant Discharge Elimination System (NPDES) Permit renewal for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio Department of Natural Resources dated January 16, 2012 providing the State of Ohio Water Withdrawal Facility Registration Annual Report Form, Year Ending December 31, 2011, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to the Hamilton County Department of Environmental Services dated January 18, 2012 presenting a copy of the 2011 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 January 27, 2012 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 State Emergency Response Commission dated February 17, 2012 providing the 2011 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 17, 2012 providing the 2011 chemical inventory report fee for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A report to the Ohio EPA dated February 17, 2012 titled 2011 Annual Groundwater Monitoring Report, RCRA Land Treatment Unit, Chevron Cincinnati Facility, Hooven, Ohio, Facility I.D. OHD004254132.
 - A letter to Ohio EPA dated February 20, 2012 presenting the 2011 Annual Hazardous Waste Report for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to Ohio EPA dated March 21, 2012 providing the 2010-2011 Biannual Non-Title V Air Emissions Report for Air Permit Number 1431080082, Chevron Cincinnati Facility, Hooven, Ohio.

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- A letter to Ohio EPA dated March 23, 2012 providing Financial Assurance for Closure and Post-Closure Care and Liability Coverage for the Land Treatment Unit at the Chevron Cincinnati Facility, Hooven, Ohio.
5. The following monitoring and assessment activities were conducted in the first quarter of 2012:
- Bi-monthly fluid level gauging was performed across the facility, Hooven, Southwest Quad, and Gulf Park on January 27 and March 28, 2012.
 - The installation of an interior and exterior groundwater monitoring well along the southern barrier wall near Gulf Park was completed on March 15, 2012.
 - Repairs to the southern section of the sheet pile barrier wall and bank stabilization measures along the East Bank of the Great Miami River near Gulf Park was completed on March 15, 2012.
 - Modifications to the Gulf Park bioventing system which included the installation of 14 additional biovent wells south of the current system began on March 19, 2012.

Planned Activities – Second Quarter 2012

1. The following monitoring and assessment activities are planned for the second quarter of 2012:
- Bi-monthly fluid level gauging within the shallow monitoring network across the former refinery and Gulf Park in May 2012.
 - Weekly high-grade, HSVE, and 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.
 - Semiannual groundwater monitoring of the lysimeters, facility, Hooven, and Southwest Quad monitoring wells.
2. Review and validation of the laboratory analytical data will continue to be conducted as necessary.

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 – Ohio EPA