

US EPA ARCHIVE DOCUMENT



Gene Choquette
Cincinnati Facility
Site Manager

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

July 2, 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: Second 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 April 1 to June 30, 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 second quarter of 2012:
 - A letter dated April 4, 2012 presenting the *First Quarter 2012 AOC Progress Report*.
 - An email with attached text dated April 20, 2012 providing a summary of the March 1, 2012 meeting with the USEPA Region 5 discussing the findings and recommendations provided within the *Five Year Corrective Measures Implementation Review*.
 - A letter dated April 24, 2012 providing a request for a "Determination of Completion for Construction" for the installation of additional systems and infrastructure to support groundwater corrective measures implementation at the Chevron Cincinnati Facility.
 - A letter dated May 30, 2012 requesting a reduction in laboratory analysis of soil vapor samples collected monthly from nested vapor monitoring wells VW-96 and VW-99 following start-up of the horizontal soil vapor extraction (HSVE) system beneath Hooven.
 - An email with attachments dated June 14, 2012 providing the first 2012 semiannual analytical results for the Southwest Quad. The email discussed the presence and potential sources of low level detections of arsenic reported above the USEPA maximum contaminant levels (MCLs) within groundwater samples collected from sentinel well MW-35 and point of compliance well MW-133.

- A phone call on June 20, 2012 discussing the previously submitted correspondence listed above, as well as an update on the ongoing human health risk assessments to support redevelopment within the Northern Parcels (consisting of the former North Tank Farm, Marketing Terminal, and Elco-lease area) and the Barge Terminal located along the Ohio River. A notification for reaching high-grade trigger levels within the Central High-Grade Area was also provided to the USEPA, as well as a schedule for high-grade pumping, biologically enhanced granular activated carbon (GAC) treatment system, and HSVE systems startup.
 - A report dated June 22, 2012 presenting the *Northern Parcels Human Health Risk Assessment, Chevron Cincinnati Facility, Hooven, Ohio*.
 - An email dated June 29, 2012 providing fluid level elevations with a comparison to remedial system operational trigger levels, as well an update to the schedule for high-grade pumping from production well PROD_25 and start-up of the HSVE system. Additionally, notification was provided for monitoring within the nested soil vapor monitoring wells in Hooven during the week of July 2, 2012.
2. The USEPA completed the following communications with Chevron during the second quarter of 2012.
- A phone call on April 2, 2012 from Chris Black to determine if the groundwater monitoring wells along the southern barrier wall at Gulf Park had been installed. Chevron informed Mr. Black that the wells were installed on March 15, 2012.
 - A phone call on April 9, 2012 from Chris Black stating that a formal request from Chevron will be required in order to issue a “Determination of Completion for Construction” for the installation of additional systems and infrastructure to support groundwater corrective measures implementation at the Chevron Cincinnati Facility.
3. Other agency correspondence in the second quarter of 2012 included:
- A letter to Hamilton County Environmental Services dated June 26, 2012 attaching the local Annual Air Permit Fee for Premise No. 1431080082 (Chevron Cincinnati Facility).
4. The following monitoring and assessment activities were conducted in the second quarter of 2012:
- Semiannual monitoring of the rapid optical screening technology (ROST) transects in the Southwest Quad was conducted on June 14 and 15, 2012.
 - Semiannual groundwater monitoring and collection of rainwater infiltrate samples from lysimeters across the former refinery and adjacent properties was conducted between April and May 2012.
 - Seasonal operation of the Gulf Park bioventing system was started on April 18, 2012, with a shutdown period between May 1 and May 29, 2012 due to spike in the water table following precipitation events and minor flooding.
 - Re-sampling of Southwest Quad sentinel and point of compliance monitoring wells MW-35 and

MW-133 due to detections of arsenic above the USEPA MCLs was completed on May 23, 2012.

- Bi-monthly fluid level gauging was performed across the facility, Hooven, Southwest Quad, and Gulf Park on May 25, 2012.
- Weekly high-grade, HSVE, and Gulf Park systems trigger level monitoring.
- Collection of soil and soil vapor samples from the former Barge Terminal for the purpose of assessing risk to commercial/industrial receptors for future redevelopment was completed in June 2012.
- Preparations of the high-grade pumping, biologically enhanced GAC groundwater treatment, and HSVE systems. High-grade pumping was initiated in the Central High-Grade Area utilizing production well PROD_25 on June 25, 2012.

Planned Activities – Third Quarter 2012

1. The following monitoring and assessment activities are planned for the third quarter of 2012:

- Weekly high-grade, HSVE, and Gulf Park systems trigger level monitoring; in addition to bi-weekly monitoring of additional wells within the high-grade areas during active pumping.
- Bi-monthly fluid level gauging within the shallow monitoring network across the former refinery, Hooven, Southwest Quad, and Gulf Park in July and September 2012.
- Annual groundwater monitoring of the Gulf Park monitoring wells and barrier wall monitoring wells.
- Semiannual groundwater monitoring and collection of rainwater infiltrate samples from lysimeters.
- Annual groundwater monitoring at the RCRA Land Treatment Unit.
- Annual monitoring of selected nested soil vapor monitoring wells in Hooven (consisting of the 5, 10, 15, 20, 30, 40, and 50 ft-bgs intervals in nested soil vapor monitoring wells VW-93, VW-96, VW-99, VW-128, and VW-129).
- Startup and routine monitoring of the HSVE system and nested wells in Hooven (consisting of monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99).
- Continued operation and monitoring of the Gulf Park biovent systems.
- Continued operation and monitoring of high-grade pumping from production well PROD_25 in the Central High-Grade area with eventual transition to pumping within the Southeast High-Grade Area using production wells PROD_19 and PROD_24, once trigger levels have been reached.
- Installation of the remaining three biovent injection wells to complete the southern expansion of

the Gulf Park bioventing system. These wells could not be previously installed due to their location with an active soccer field.

2. Review and validation of the laboratory analytical data, as well as routine reporting associated with implementation of groundwater corrective measures 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

cc: Jeffery Stark – Ohio EPA