

US EPA ARCHIVE DOCUMENT



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April 14, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher Black
U.S. EPA – Region 5
Corrective Action Section
Enforcement and Compliance Assurance Branch
77 West Jackson Blvd. LU-9J
Chicago, IL 60604-3590

Re: 1st Quarter 2008 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, 2008 to March 31, 2008. 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 1st quarter of 2008:

- A report dated January 9, 2008 summarizing the Administrative Order on Consent quarterly progress report.
- A report dated January 24, 2008 presenting the First Semiannual 2007 Interim Measures Groundwater Monitoring results.
- A letter dated January 25, 2008 notifying U.S. EPA of the plugging and abandoning of two groundwater wells and 10 soil vapor wells.
- A report dated January 29, 2008 summarizing the Soils and Sludges Remedy quarterly progress report.
- A letter dated January 30, 2008 notifying U.S. EPA of the project manager change from Randy Jewett to myself.
- A report dated March 7, 2008 summarizing the Vernal Pool design basis, which is the proposed ecological restoration of SWMUs 7 and 8.
- A report dated March 14, 2008 presenting the 10-Year Soil Vapor Retrospective, a report summarizing the past 10-years of soil vapor sampling results, and HSVE operation.

- A letter dated March 17, 2008 notifying U.S. EPA of the intent to plug and abandon monitoring wells located at the former Elco leased property.
 - A letter dated March 26, 2008 presenting Chevron's Financial Test and Corporate Guarantee, Form 10-K, Accountant's Special Report, and Chevron's bond rating information.
 - A report dated March 28, 2008 presenting the updated engineering options evaluation for the sheet pile barrier and river bank stabilization project at the Gulf Park site.
2. The U.S. EPA was copied on the following correspondence submitted by Chevron to other parties in the 1st quarter of 2008:
- A report dated January 29, 2008 sent to Mr. John Barlage of Hamilton County Environmental Services presenting the quarterly report for the HSVE system.
 - A report dated January 29, 2008 sent to Mr. John Barlage of Hamilton County Environmental Services presenting the semiannual report for the HSVE system.
 - A report dated January 21, 2008 sent to Mr. Harold O'Connell of the Ohio EPA presenting the 2007 Annual Groundwater Monitoring Report for the RCRA Land Treatment Unit.
 - A memo dated January 21, 2008 sent to the Chevron CAP members presenting the December monthly facility update.
 - A memo dated February 6, 2008 sent to the Chevron CAP members presenting the January monthly facility update.
 - A memo dated March 5, 2008 sent to the Chevron CAP members presenting the February monthly facility update.
 - A letter dated March 18, 2008 sent to Mr. Steve Renninger of U.S. EPA summarizing discussions regarding U.S. EPA's upcoming Hooven vapor investigation.
3. Chevron received the following correspondence from the U.S. EPA and/or the Ohio EPA in the 1st quarter of 2008:
- A letter dated January 24, 2008 presenting U.S. EPA's comments on the engineering options evaluation for the sheet pile barrier and river bank stabilization project at the Gulf Park site.
 - A letter dated February 11, 2008 presenting U.S. EPA's requirement that Chevron not operate the HSVE system during calendar year 2008.
 - A document dated February 27, 2008 providing a model Environmental Covenant that Chevron will use to create the environmental covenants that will be recorded on the property deeds.
 - A letter dated March 17, 2008 presenting U.S. EPA's approval of the updated engineering options evaluation for the sheet pile barrier and river bank stabilization project at the Gulf Park site.

4. Work with the developers/owners/permitting agencies continued on issues associated with installing a storm water management system in portions of the Southwest Quadrant, and on institutional control issues.
5. The following monitoring activities/field investigations were conducted in the 1st quarter of 2008:
 - Bi-monthly groundwater monitoring.
 - Quarterly groundwater sampling of newly installed sentinel and POC wells.
 - Installation of the nested vapor and groundwater wells as described in the RIP.
6. The soils remedy project was largely completed in the 2nd quarter of 2007. However, soil confirmation samples revealed that more excavation was required at the former Elco processing area. A total of 6,521 tons of soil was shipped in 280 truckloads to the Waste Management Stony Hollow facility in Dayton, Ohio for disposal during the 1st quarter. Excavation and disposal was completed on February 4, 2008. Confirmation samples of the re-excavated areas were collected and analyzed, and the results showed that cleanup criteria had been met. Backfill of the former Elco processing area was completed in February.

Backfill of the other excavation areas continued during the 1st quarter of 2008. Clean stockpiled soils were used to backfill excavation areas. Due to wet weather, remaining backfilling will be resumed later this year during dry conditions.
7. The Gulf Park Bioventing system remained shut down due to groundwater levels above the trigger level.
8. The Hooven HSVE system remained shut down. It will remain shut down during calendar year 2008 due to U.S. EPA's requirement.
9. The water treatment system remained in dual train operation until January 8th, 2008 when it was shutdown due to water levels rising above the trigger level following the 2007 Hi-Grade recovery season. The system will remain off until the next Hi-Grade recovery season starts. Through the end of the 2007 Hi-Grade season, 80,873 gallons of hydrocarbon were recovered.

Planned Activities – 2nd Quarter 2008

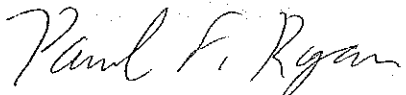
1. The following monitoring and fieldwork activities are planned:
 - Gulf Park system trigger level monitoring and operation, if appropriate.
 - Bi-monthly groundwater monitoring.
 - Semiannual groundwater sampling in accordance with the Operations, Monitoring, and Maintenance plan (including quarterly groundwater monitoring of the newly installed sentinel

and POC wells).

- Annual groundwater sampling at the Land Treatment Unit.
 - River observations and surface water sampling.
 - Sampling of the deep nested vapor probes in Hooven in accordance with the AOC.
2. Final backfilling, surface contouring, and reseeded activities associated with the soils remedy project will continue.
 3. Laboratory analytical data and quality assurance information will continue to be evaluated.

We appreciate your continued support and assistance on this project. If you have any questions or require any additional information, please contact me at (925) 842-0230 or Chris Aneiros (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,



Paul F. Ryan – Site Manager
Chevron Cincinnati Facility
Chevron Environmental Management Company

By Chris Aneiros, Trihydro Corporation, as agent for
Chevron Environmental Management Company

500-017-011

cc: Harold O'Connell – OEPA