UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

August 25, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. Paul Ryan
Chevron U.S.A. Inc.
5000 State Route 128
Cleves, OH 45002

Re: Remedial Measures Workplan for Sheet Pile Barrier and Bank Stabilization along the Great Miami River, Chevron Cincinnati Facility
OHD 004 254 132

Dear Mr. Ryan:

On December 6, 2007, Chevron submitted the Remedial Measures Workplan for Sheet Pile Barrier and Bank Stabilization along the Great Miami River, Chevron Cincinnati Facility to the U.S. Environmental Protection Agency (U.S. EPA). The submittal was required under paragraph 11(g) of the RCRA Section 3008(h) Administrative Order on Consent between Chevron U.S.A. Inc. and U.S. EPA signed November 1, 2006, Docket No. RCRA-05-2007-0001. Previously on June 11, 2007, U.S. EPA had reviewed and approved the document *Evaluation of Engineering Options along the Great Miami River, Chevron Cincinnati Facility* in which the sheet pile barrier and bank stabilization was the preferred remedy.

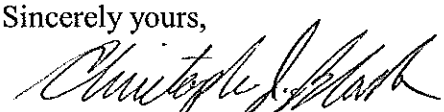
The Remedial Measures Workplan provides details of the engineering, construction activities and remedy elements. U.S. EPA and Chevron's representatives discussed U.S. EPA's comments on the Remedial Measures Workplan during a March 13, 2008 call. On March 20, 2008 U.S. EPA, Chevron and their representatives conducted a conference call to clarify issues from the call on March 13th. On March 21, 2008 U.S. EPA sent Chevron's representatives an e-mail summarizing the comments and responses. On March 28, 2008, Chevron's representatives sent an e-mail to U.S. EPA with some final clarifications and a revision to the Remedial Measures Workplan. These e-mail correspondence and revised text of the Remedial Measures Workplan are enclosed.

The Remedial Measures Workplan's construction requires a permit from the Army Corps of Engineers (ACE). As part of the ACE permit an endangered species survey is required, Chevron has completed the survey and submitted it to the U.S. Fish and Wildlife (USFW). USFW has reviewed Chevron's endangered species surveys conducted at the site and made their

determination in an August 1, 2008 letter to Chevron's representatives that the project is "not likely to adversely affect" the three endangered species identified, running buffalo clover, Indiana bats, and the sheepnose mussel. The Army Corps of Engineers permit is currently outstanding, and their determination is expected by August 31st. In addition the ACE permit requires a Cultural Resource Management Investigation Report which has been submitted by Chevron and is currently under review by the Ohio State Historical Preservation Office and their concurrence is pending.

U.S. EPA hereby approves the revised version of the Remedial Measures Workplan for Sheet Pile Barrier and Bank Stabilization along the Great Miami River, Chevron Cincinnati Facility, the pending ACE permit and the Ohio State Historical Preservation Office concurrence outstanding. Chevron shall submit the final revised document to U.S. EPA. If you have any questions, please contact me at (312) 886-1451.

Sincerely yours,



Christopher J. Black
Corrective Action Section 2
Remediation and Reuse Branch
Land and Chemicals Division

Enclosure

cc: Harold O'Connell, OEPA-SWDO
cc: Jerome Kujawa, ORC

Keith Rittle

From: Keith Rittle
Sent: Friday, March 28, 2008 9:51 AM
To: 'Black.Christopher@epamail.epa.gov'
Cc: Ryan, Paul F; Chris Aneiros; Justin Pruis; John Meyer
Subject: RE: Summary of Remedial Measure Workplan Comments and Answer Correspondence
Attachments: 200803_BarrierWorkPlan_WP.doc

Chris - your summary looks generally consistent with our collective understanding of our discussions. We suggest the following additions/clarifications:

1. During our March 13 conversation, I have in my notes that we also discussed the following questions which you posed:

Q9.) What will be the extent to which trees are cleared in order to facilitate the proposed work?

Keith described that the lateral extent can be inferred by comparing the current to the proposed final grade on the A-A, B-B and C-C cross sections on Sheets 3 and 4. The width of vegetation which will need to be cleared is narrower at the southern end, about 30-40 feet wide, and widening to 100+ at the northern end of the work area.

Q10.) How will stormwater runnoff permitting be addressed?

Keith indicated that the work will be performed under an existing general contruction stormwater permit which is in place with the Ohio Environmental Protection Agency (OEPA). An ammendment to the site-specific Stormwater Pollution Prevention Plan (SWPPP) will be made prior to commencement of the work, to ensure that the site SWPPP addresses all of the stormwater control measures which will be necessary related to the river bank stabilization work.

As a clarification regarding your summary of the discussion around Question 6 - the 1-D model scour analysis on it's own isn't necessarily conservative – it's just an average across the entire wetted cross section. What is conservative is our analysis using the various 3-dimensional shear components obtained from the 1-D model (from our RAS model) and the governing equations for 2-D and 3-D modeling (from FMSM's report) which were used, thus adding in a factor of safety.

And a clarification regarding the summary on Question 8 is that it was Justin Pruis with Trihydro who spoke to the question regarding the coffer dam construction sequence, not John Meyer.

Based on our discussions, the only revisions which have been made to the December 6, 2007 draft Workplan pertain to the coffer dam construction description, primarily in Section 3.3. Proposed revisions to the report to address the discussions regarding this matter are reflected in the attached redline version of the report text. Please let us know if these proposed changes are acceptable to USEPA, or if you have any further questions or comments regarding the Workplan.

Keith Rittle
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From: Black.Christopher@epamail.epa.gov [mailto:Black.Christopher@epamail.epa.gov]
Sent: Friday, March 21, 2008 3:54 PM
To: Keith Rittle

Cc: Ryan, Paul F; Chris Aneiros; Justin Pruis; John Meyer
Subject: Re: Summary of Remedial Measure Workplan Comments and Answer Correspondence

Please review for accuracy and provide feedback.

Keith,

I am sending this e-mail to summarize the comments and correspondence on the "*Remedial Measures Workplan for Sheet Pile Barrier and Bank Stabilization along the Great Miami River- Chevron Cincinnati Facility Hooven, Ohio*" dated December 6, 2007. U.S. EPA provided comments in March 27, 2007 letter on a previous submittal the " *Evaluation of Engineering Options along the Great Miami River, Chevron Cincinnati Facility*". Some of these comments on the Evaluation of Engineering Options Report addressed issues seen in the Remedial Measures Workplan.

U.S. EPA has conducted a review of the Remedial Measures Workplan and developed some questions for clarifications. Chris Black of U.S. EPA spoke with Keith Rittle of TriHydro Corporation, Chevron's consultants on March 13th, 2008 and asked questions and obtained clarifications on the following issues:

Q1.) How far will the sheet pile be above the final grade? Sheet 4 and 5 seem to contradict.

Keith explained that the top of the sheet pile wall will only be a few feet above grade and that Sheet 5 in the Workplan intends to show the barrier wall in profile as it covers the entire height of the smear zone extent and that the dashed existing grade line does not indicate the actual final grade.

Q2.) The workplan indicates that a representative sample of river gravel will be collected before being used as clean fill behind the barrier. What is a representative sample?

Keith explained the river sediment fluctuates and the sampling of the river gravel would be conducted closer to the time of construction.

Q3.) I also wanted to know if the possibility of using the SWMU 10 berm was going to used that representative samples for VOCs, SVOCs, and metals be conducted on that material due to it being near impacted soil.

Keith said it is less likely to use this material, and that if it would be used, it would sampled before use.

Q4.) Is borrowing gravel from the island and excavating from the channel on the east side of the island going to happen for sure or a contingency?

Keith said that these excavations will happen and that the excavating of the channel on the east side of the island was necessary due to the change in channel dynamics with the construction.

Q5.) Who will be conducted the inspections for LNAPL and other physical inspections, specified in the Performance Monitoring Plan - Appendix A?

Keith said that will be a representative of Chevron- one of their consultants.

****Some additional Questions were addressed on a follow up phone call on 3/20/08**

Q6.) I had questions about the Report of Floodplain and Scour Analysis - Appendix B. The Summary and Recommendations section seems to suggest the 1D analysis conducted might not e enough to fully characterize the modeling of the scour.

I spoke with John Meyer of Tri Hydro who explained that the 1D model is a conservative model and that the 2D modelling is problematic and that he used the basic governing equations of the model to analyze the shear stress on the barrier wall and this also proved the wall as designed to be able to take these stresses.

Q7.) A clarification of the Workplan (Performance Monitoring Plan-Appendix A) - Is the OEPA surface water screening standards from Jordan Creek, or the Jordan Creek Segment of the Great Miami River.

The standards used are from the Jordan Creek Segment of the Great Miami River.

Q.8) Is the Coffer Dam installation moving from the south to the north?

John Meyer explained that the sheet pile installation will proceed from the north to the south. The north approximately 2/3rd will be on the land above river level and the southern 1/3rd will require coffer dam construction.

-----"Keith Rittle" <krittle@trihydro.com> wrote: -----

To: Christopher Black/R5/USEPA/US@EPA
From: "Keith Rittle" <krittle@trihydro.com>
Date: 03/18/2008 10:17AM
cc: "Ryan, Paul F" <PRyan@chevron.com>, "Chris Aneiros" <caneiros@trihydro.com>, "Justin Pruis" <jpruis@trihydro.com>, "John Meyer" <jmeyer@trihydro.com>
Subject: GMR Engineering Design Call - Thur 4pm

Chris - in followup to our message exchange, I've scheduled a call for Thur at 4pm central to follow-up on your questions regarding the Great Miami River engineering design. We'll have a couple of our engineers that performed most of the design work, Justin Pruis and John Meyer, on the call to speak to the questions on which I indicated we'd get back to you. Talk with you Thursday,

Keith

Starting Time: Mar 20, 2008 at 4:00 PM US/Central
Duration: 1 hour

To join the audio portion of the conference:
a. Dial +1-307-755-4950 or 12005 and enter access code 0167177, or