

US EPA ARCHIVE DOCUMENT



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January 8, 2013

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 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 October 1 to December 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 fourth quarter of 2012:
 - A letter dated October 11, 2012 presenting the *Third Quarter 2012 AOC Progress Report*.
 - An email dated October 12, 2012 providing notification regarding transition of high-grade pumping from production wells in the Southwest High-Grade Area back to production well PROD_25 in the Central High-Grade Area. The email also provided total recovery amounts for 2013 to date, and an electronic copy of the *Third Quarter 2012 AOC Progress Report*.
 - A phone call on November 1, 2012 providing an update to high-grade recovery status and HSVE operations. A discussion on timeframe for the submittal for the *First 2012 Semiannual Monitoring Report* and the *Barge Terminal Human Health Risk Assessment*. In addition, administrative options for removing the Barge Terminal parcels from the 2006 AOC were also discussed.
 - An email to the USEPA on November 16, 2012 providing the *2012 Wildlife Habitat Council Certification* submittal. A list of additional examples of green remediation employed at the Chevron Cincinnati Facility was also provided for USEPA internal purposes.

- A report dated December 13, 2012 presenting the *Barge Terminal Human Health Risk Assessment, Chevron Cincinnati Facility, Hooven, Ohio.*
 - An email dated December 17, 2012 providing a draft summary of soil vapor monitoring performed in nested wells VW-93, VW-96, VW-99, VW-128, and VW-129 situated in Hooven between July and October of 2012.
 - A report dated December 18, 2012 presenting the *First 2012 Semiannual Monitoring Report, Chevron Cincinnati Facility, Hooven, Ohio.*
2. The USEPA completed the following communications with Chevron during the fourth quarter of 2012.
- A phone call from the USEPA on November 6, 2012 requesting an electronic version of the most recent *Wildlife Habitat Council Certification* submittal for internal purposes.
3. Other agency correspondence in the fourth quarter of 2012 included:
- A letter to Ohio EPA dated November 28, 2012 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 13, 2012 presenting the 2012 Annual Report for Equipment in Liquid Service (visual inspection checklist, and fugitive emissions survey), Chevron Cincinnati Facility, Hooven, Ohio.
4. The following monitoring and assessment activities were conducted in the fourth quarter of 2012:
- Continued operation of the Gulf Park bioventing system that was restarted in accordance with seasonal triggers on April 18, 2012. The system was temporarily shut down from May 1, 2012 through May 29, 2012 due to temporary flooding of the Great Miami River.
 - Continued operation and monitoring of high-grade pumping since initiation on June 25, 2012 in accordance with seasonal triggers. High-grade pumping was started using production well PROD_25 in the Central High-Grade area with a transition to pumping within the Southwest High-Grade Area using production wells PROD_19, PROD_20, PROD_21, and PROD_24 on July 17, 2012. Recovery efforts were transitioned back to the Central High Grade Area utilizing production well PROD_25 on October 11, 2012 as a result of LNAPL recovery below trigger limits (500 gallons per day) over a two week average. High-grade pumping in the Central High-Grade Area continued through the end of the quarter. A total of 42,803 gallons of LNAPL was recovered between June 25th and December 31st 2012.
 - Continued operation and monitoring of the HSVE system which was restarted on July 11, 2012 in accordance with trigger groundwater elevations established in the AOC amendment dated June 23, 2010. Operation has continued through the end of the quarter.
 - Semiannual groundwater monitoring at the former refinery and adjacent properties was conducted in October 2012.

- Gulf Park soil vapor respirometry testing using shallow soil gas probes installed near the biovent system wells was conducted in October 2012.
- Semiannual groundwater monitoring of the main-site barrier wall monitoring wells in November 2012.
- Bi-monthly fluid level gauging was performed across the facility, Hooven, Southwest Quad, and Gulf Park on November 27, 2012.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 in October, November and December 2012 during operation of the HSVE system.
- Semiannual monitoring of the rapid optical screening technology (ROST) transects in the Southwest Quad was conducted on December 19 and 20, 2012.
- Weekly high-grade, HSVE, and Gulf Park systems trigger level monitoring.

Planned Activities – First Quarter 2013

1. The following monitoring and assessment activities are planned for the first quarter of 2013:
 - 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 January and March 2013.
 - Continued operation and 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) until trigger elevations are reached for suspending operation of the system.
 - Continued operation and monitoring of the Gulf Park biovent systems until seasonal trigger elevations are reached for suspending biovent operations.
 - Continued operation and monitoring of high-grade pumping within the Central High-Grade Area utilizing production well PROD_25 until trigger elevations are reached for suspending high-grade recovery efforts.
 - Annual groundwater monitoring from the Southwest Quad point of compliance and sentinel monitoring wells network.
 - Annual groundwater monitoring within the lysimeters, facility, Hooven, and Southwest Quad monitoring wells.
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.

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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