

US EPA ARCHIVE DOCUMENT



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April 11, 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: First Quarter 2013 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, 2013. 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 2013:
 - A letter dated January 8, 2013 presenting the *Fourth Quarter 2012 AOC Progress Report*.
 - An email dated January 8, 2013 informing the USEPA of the completion of high-grade pumping on January 8, 2012. This email also provided a summary of the high grade end points and light non-aqueous phase liquid (LNAPL) recovery estimates for this event.
 - An email dated January 15, 2013 informing the USEPA of the completion horizontal soil vapor extraction (HSVE) and Gulf Park biovent system operations on January 15, 2013 due to sustained high water table elevations.
 - An email with attached spreadsheets dated January 22, 2013 providing an update to the final remedy cost estimate and a list of significant changes for the Chevron Cincinnati Facility.
 - A conference call between Chevron and the USEPA on February 11, 2013 to discuss the human health risk assessments submitted for the Barge Terminal and Northern Parcels of the former refinery.
 - An email dated March 6, 2013 discussing arrangements for a meeting at the USEPA Region 5 headquarters on March 26, 2013 to review groundwater corrective measures implementation during 2012.

- An email dated March 13, 2013 providing a draft agenda for the meeting at USEPA Region 5 headquarters on March 26, 2013.
 - An email with attached table dated March 25, 2013 providing the results of the draft soil vapor monitoring results from nested wells VW-96 and VW-99 during operation of the HSVE system during the second half of 2012.
 - A letter dated March 28, 2013 providing the following financial assurance documents: Financial Test Letter, Corporate Guarantee for Corrective Action, 2012 Chevron Form 10-K, Accountant's Special Report, and Bond Rating Information for the Chevron Cincinnati Facility, Hooven, Ohio.
2. The USEPA completed the following communications with Chevron during the first quarter of 2013.
- An email from the USEPA on January 24, February 6, and February 7, 2013 discussing arrangements for a conference call between Chevron and the USEPA to discuss the risk assessments submitted for the Barge Terminal and Northern Parcels.
3. Meetings between Chevron and USEPA conducted during the first quarter of 2013.
- Chevron met with the USEPA Region 5 on March 26, 2013 to discuss corrective measures activities for groundwater performed during 2012.
4. Other agency correspondence in the first quarter of 2013 included:
- A letter to Ohio Department of Natural Resources dated January 18, 2013 providing the State of Ohio Water Withdrawal Facility Registration Annual Report Form, Year Ending December 31, 2012, Chevron Cincinnati Facility, Hooven, Ohio.
 - A letter to the Hamilton County Department of Environmental Services dated January 18, 2013 presenting a copy of the 2012 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 18, 2013 providing the July through December 2012 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 22, 2013 providing the 2012 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 22, 2013 providing the 2012 chemical inventory report fee for the Chevron Cincinnati Facility, Hooven, Ohio.
 - A report to the Ohio EPA dated February 22, 2013 titled 2012 Annual Groundwater Monitoring Report, RCRA Land Treatment Unit, Chevron Cincinnati Facility, Hooven, Ohio, Facility I.D. OHD004254132.

- A letter to Ohio EPA dated March 28, 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 2013:
- High-grade recovery which started on June 25, 2012 operated using the following primary production wells over the course of the event:
 - PROD_25 from June 25 to July 17, 2012
 - PROD_19 from July 17, 2012 to October 11, 2012, when the high-grade recovery event was terminated due to reduced LNAPL recovery in accordance with high-grade triggers.
 - PROD_25 from October 11, 2012 to January 9, 2013 when the high-grade recovery event was terminated due to a rebound in groundwater elevations in accordance with high-grade triggers.

The biological granulated activated carbon (GAC) wastewater treatment system was placed in standby mode until the next high-grade recovery event. A total of approximately 42,000 gallons of LNAPL was recovered during this event.

- The HSVE system extending beneath Hooven was started on July 11, 2012. Due to sustained groundwater elevations above trigger levels, HSVE system operation was suspended on January 14, 2013.
- The Gulf Park biovent system was shut down on January 11, 2013. The system has remained off for the remainder of the reporting period due to groundwater levels above the operation trigger elevation.
- Bi-monthly fluid level gauging was performed across the facility, Hooven, Southwest Quad, and Gulf Park on January 29 and March 22, 2013.
- Annual groundwater monitoring at the former refinery and adjacent properties was conducted in February and March 2013.
- Lysimeter sampling was conducted in March 2013.
- Nested groundwater monitoring well sampling was conducted in March 2013.
- Weekly high-grade, HSVE, and Gulf Park systems trigger level monitoring.

Planned Activities – Second Quarter 2013

1. The following monitoring and assessment activities are planned for the second quarter of 2013:
- Weekly high-grade, HSVE, and Gulf Park systems trigger level monitoring.
 - Bi-monthly fluid level gauging within the shallow monitoring network across the former refinery,

Hooven, Southwest Quad, and Gulf Park in May 2013.

- Annual groundwater monitoring of the main-site barrier wall monitoring wells.
 - Rehabilitation of the HSVE lines beneath Hooven.
 - Submittal of the 2nd 2012 Semiannual Monitoring Report.
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