

US EPA ARCHIVE DOCUMENT



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Site Manager

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October 10, 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: Third Quarter 2013 Progress Report, Chevron Cincinnati Facility

Dear Mr. Black:

Chevron Environmental Management Company (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 July 1 to September 30, 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 third quarter of 2013:
 - A letter dated July 9, 2013 presenting the *Second Quarter 2013 AOC Progress Report*.
 - An email dated July 9, 2013 providing an electronic copy of the *Second Quarter 2013 AOC Progress Report*.
 - An email dated July 15, 2013 transmitting a summary of a conference call between Chevron and the USEPA on June 20, 2013 to discuss Chevron's response to the USEPA comments regarding the human health risk assessments submitted for the Barge Terminal and Northern Parcels of the former refinery.
 - An email dated July 16, 2013 resubmitting an electronic copy of the *Fourth Quarter 2012 and First Quarter 2013 AOC Progress Report* as requested by the USEPA.
 - An email on August 19, 2013 responding to questions posed by the USEPA in a July 29, 2013 email regarding solar energy development at the former refinery and the status of the modification to the draft Environmental Covenants.
 - An email dated September 3, 2013 providing notification that the nested vapor wells in Hooven

were sampled the week of August 26, 2013 and the horizontal soil vapor extraction (HSVE) system was started on September 3, 2013 in accordance with the approved Operations, Maintenance, and Monitoring Plan (OMM Plan). Chevron also provided the status of groundwater elevations with a comparison to remedial system triggers, as well as a notification that preparations were taking place for the start of high-grade pumping.

- An email on September 27, 2013 resubmitting Chevron's request to collect field measurements of fixed gases and total organic vapor concentrations from nested wells VW-96 and VW-99 during HSVE operations, en lieu of collecting soil vapor samples for laboratory analysis. A copy of Figure 2-10 from the *Second 2012 Semiannual Monitoring Report* showing oxygen and carbon dioxide correlation plots was attached to this email.
2. The USEPA sent the following correspondence to Chevron during the third quarter of 2013.
 - An email on July 29, 2013 asking if there had been any interest in solar energy development at the former refinery and the status of modifications to the draft Environmental Covenants.
 - An email dated September 3, 2013 providing notification of a visit to the Chevron Cincinnati Facility on September 20, 2013.
 3. Meetings between Chevron and USEPA conducted during the third quarter of 2013.
 - Chris Black, the USEPA Region 5 Site Manager, visited the former refinery and Barge Terminal on September 20, 2013 for a site tour and to discuss the groundwater remedy implementation, risk assessment, and redevelopment activities.
 4. Other agency correspondence in the third quarter of 2013.
 - A letter from Ohio EPA dated July 1, 2013 approving the Financial Assurance and post-closure cost estimates for the Chevron Cincinnati Facility.
 - A letter to Hamilton County Environmental Services dated July 23, 2013 providing the *Annual Air Permit Fee for Premise #:1431080082 (Chevron Cincinnati Facility)*.
 - A letter to Hamilton County Environmental Services dated July 24, 2013 presenting the *Semiannual Report (January 2013 through June 2013) for the Permit-to-Install and Operate Source P010 (HSVE System)*.
 - A letter from Ohio EPA dated August 12, 2013 presenting the results of the August 7, 2013 National Pollution Discharge Elimination System (NPDES) compliance evaluation inspection at the Chevron Cincinnati Facility (NPDES Permit 1IG00000*GD, OH0009326).
 - A letter from Ohio EPA dated October 1, 2013 presenting the results of the September 13, 2013 Land Treatment Unit (LTU) compliance evaluation inspection.
 5. The following monitoring and assessment activities were conducted in the third quarter of 2013:
 - Continued operation of the Gulf Park bioventing system that was started in accordance with the OMM Plan on June 3, 2013.

- Startup of the HSVE system on September 3, 2013 in accordance with groundwater trigger elevations established in the AOC amendment dated June 23, 2010.
- Bi-monthly fluid level gauging was performed across the former refinery, Hooven, Southwest Quad, and Gulf Park on July 30, 2013 and September 30, 2013.
- Annual laser induced fluorescence monitoring of the Rapid Optical Screening Tool (ROST) transects in the Southwest Quad was conducted on August 6 and 7, 2013.
- Annual groundwater sampling of the LTU monitoring network was completed between August 21 and 23, 2013.
- Annual monitoring of selected nested soil vapor monitoring wells in Hooven (including wells VW-93, VW-96, VW-99, VW-128, and VW-129) was performed during the week of August 26, 2013.
- Monthly monitoring of selected intervals in nested soil vapor monitoring wells VW-96 and VW-99 was completed on September 24, 2013 during operation of the HSVE system.
- Annual monitoring of the Gulf Park groundwater and barrier wall monitoring wells was completed on September 24, 2013.
- Collection of additional soil samples from the North Tank Farm and Marketing Terminal areas on the former refinery (referred to as the Northern Parcels) for the purpose of supporting redevelopment of these parcels was completed in August and September 2013.
- Preparation of the high-grade pumping systems and biologically enhanced granular activated carbon treatment system including the replacement of the steel effluent lines with high density polyethylene in anticipation of achieving operational groundwater elevation triggers.
- Weekly high-grade, HSVE, and Gulf Park fluid level monitoring.

Planned Activities – Fourth Quarter 2013

1. The following monitoring and assessment activities are planned for the fourth quarter of 2013:
 - Weekly high-grade, HSVE, and Gulf Park fluid 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 November 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).
 - Continued operation and monitoring of the Gulf Park biovent systems.

- Gulf Park soil vapor respirometry testing using shallow soil gas probes installed near the biovent system wells.
 - Operation and monitoring of high-grade pumping within the Southwest High-Grade Area using production wells PROD_19, PROD_20, PROD_21, and PROD_24, or the Central High-Grade Area utilizing production well PROD_25.
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: Brian Marlatt – Ohio EPA