

US EPA ARCHIVE DOCUMENT

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July 15, 2007

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. DE-9J
Chicago, IL 60604-3590

Re: 2nd Quarter 2007 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, covering the time period from April 1, 2007 to June 30, 2007. 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 2nd quarter of 2007:
 - A report dated April 14, 2007 summarizing the Administrative Order on Consent quarterly progress report.
 - A report dated April 26, 2007 summarizing the Soils and Sludges Remedy quarterly progress report.
 - A letter dated April 30, 2007 presenting Chevron's response to U.S. EPA's comments regarding the Evaluation of Engineering Options Along the Great Miami River, including a revised Evaluation report.
2. The U.S. EPA was copied on the following correspondence submitted by Chevron to other parties in the 2nd quarter of 2007:
 - A report dated April 26, 2007 sent to Mr. John Barlage of Hamilton County Environmental Services presenting the quarterly report for the HSVE system.

3. Chevron received the following correspondence from the U.S. EPA and/or the Ohio EPA in the 2nd quarter of 2007:
 - A public notice, dated May 21 presenting Ohio EPA's review of Chevron's request for a NPDES permit modification.
 - A report dated June 1, 2007 presenting Ohio EPA's NPDES compliance inspection summary.
 - A letter dated June 11, 2007 presenting U.S. EPA's approval of the revised Evaluation of Engineering Options Along the Great Miami River, dated April 30, 2007.
4. A CAP meeting was held at the Whitewater Senior Center and Township Hall on April 11, 2007. Chevron presented an overview of ongoing projects. Ms. Susan Walpole from the Fernald Preserve gave a presentation regarding the cleanup at the Fernald facility.
5. 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.
6. The following monitoring activities/field investigations were conducted in the 2nd quarter of 2007:
 - The 1st semiannual groundwater monitoring event.
 - The annual LTU groundwater monitoring event.
 - The Hooven soil vapor monitoring event, in accordance with the RIP/OMM plans.
 - Trigger level monitoring and operation of the HSVE and Gulf Park Bioventing systems.
 - Monitoring and implementation for hi-grade groundwater recovery.
7. The soils remedy project was largely completed in the 2nd quarter of 2007, pending soil confirmation sampling results.
 - Excavation of SWMU 33 and SWMU SS was largely completed (in accessible areas – removal of wastes located under the GAC wastewater treatment system will be completed once the Groundwater Remedy Hi-grade period is over, and the system is decommissioned). A total of 1,967 tons of hazardous soil from SWMUs 33 and SS was excavated and shipped in 85 truckloads to the Heritage Subtitle C landfill in Roachdale, Indiana for disposal during the 2nd quarter of 2007. A total of 35,379 tons of hazardous soil was shipped in 1514 truckloads since disposal began in August 2006.
 - Excavation of the former Elco processing area was completed. A total of 3,197 tons of soil was shipped in 149 truckloads to the Waste Management Stony Hollow facility in Dayton, Ohio for disposal during the 2nd quarter of 2007. A total of 30,800 tons of non-hazardous soil was shipped

in 1,373 truckloads since disposal began on January 2007.

8. Excavation and disposal activities for all SWMUs and AOCs included in the soils remedy workplan except for those areas located under and adjacent to the groundwater treatment system were completed during the second quarter of 2007, pending soil confirmation sampling results. However, data from the miscellaneous field investigations performed to support the soils remedy project continued to be evaluated.

Ambient air particulate and lead monitoring ceased when the excavation and disposal activities were completed on April 19th. Chevron anticipates that the remaining areas, SWMUS 24, 25, 26, and 90% of SS, located under and adjacent to the groundwater treatment system, will be addressed after the groundwater treatment system is no longer operational. At that time, ambient air particulate and lead monitoring will again be implemented when the SWMUs are being excavated and transported for disposal. The groundwater treatment system will remain operational in accordance with the Operations, Maintenance, and Monitoring Plan.

9. The Gulf Park Bioventing system was restarted on June 26th for seasonal operation, as groundwater levels fell below the trigger elevation.
10. The Hooven HSVE system was not operated during the 2nd quarter of 2007, as groundwater levels remained above the trigger level. The system will be restarted when water levels decline to acceptable levels, and in accordance with the Operations, Maintenance, and Monitoring Plan.
11. The water treatment system remained in single train operation in the 2nd quarter of 2007 until June 4, when the second treatment train was brought online in anticipation of Hi-Grade recovery operations.
12. Hi-Grade groundwater recovery operations began on June 20th at production well PROD_12, located in the central area of the facility. Production well PROD_12 was chosen as the initial primary recovery well because it was recently rehabilitated. Due to operational parameters, groundwater level drawdown, and capacity of the treatment system, Production well PROD_19 was also used for Hi-Grade recovery operations. Through the end of June, 200 gallons of hydrocarbon have been recovered from PROD_12 and PROD_19.
13. The water treatment system and the water production wells were temporarily off-line (as indicated below) due to power failures and maintenance activities at the facility:

April 3rd ~ 1805-1915 (power outage)

April 7th ~ 0105-0250 (power outage)

May 12th ~ 0700-1500 (power pole maintenance)

May 15th ~ 2030-0530 (power outage)

June 1st ~ 1650-1715 (power outage)

June 2nd ~ 1630-1700 (power outage)

June 7th ~ 1420-1520 (power outage)

June 29th ~ 0400-0530 (power outage)

Planned Activities – 3rd Quarter 2007

1. The following monitoring and fieldwork activities are planned:
 - Gulf Park system trigger level monitoring and operation, if appropriate.
 - Hooven HSVE system trigger level monitoring and operation, if appropriate.
 - Miscellaneous field investigations to support the Soils Remedy off-site consolidation project.
 - Miscellaneous field investigations related to Final Groundwater Remedy implementation.
 - Groundwater recovery operations.
 - Bi-monthly groundwater monitoring.
2. 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 (714) 671-3532 or Chris Aneiros (Trihydro Corporation) at (513) 353-1323, ext. 23.

Sincerely,

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

Randy W. Jewett – Site Manager
Chevron Cincinnati Facility
Chevron Environmental Management Company

500-017-010

cc: Harold O'Connell – OEPA