

US EPA ARCHIVE DOCUMENT



Randall W. Jewett
Cincinnati Facility
Site Manager

**Chevron Environmental
Management Company**
5000 State Route 128
Cleves, OH 45002
Tel 513-353-1323
Fax 513-353-4664

January 9, 2008

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: 4th 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 (AOC), covering the time period from October 1, 2007 to December 31, 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 4th quarter of 2007:
 - A report dated October 1, 2007 presenting the First Semiannual 2006 Interim Measures Groundwater Monitoring results.
 - A report dated October 11, 2007 summarizing the Administrative Order on Consent quarterly progress report.
 - A report dated October 24, 2007 summarizing the Soils and Sludges Remedy quarterly progress report.
 - A letter dated October 24, 2007 presenting confirmatory sampling results for SWMU 31.
 - A letter dated October 24, 2007 presenting confirmatory sampling results for SWMUs 7 and 8S.
 - A letter dated October 24, 2007 presenting confirmatory sampling results for SWMU LD and the former Foundry Area.
 - A letter dated October 24, 2007 presenting confirmatory sampling results for SWMU Y.
 - A report dated December 6, 2007 presenting the remedial measure work plan for the sheet pile barrier and river bank stabilization project at the former refinery site.

- Two plans dated December 13, 2007 presenting the Final Remedial Implementation Plan and Operation, Maintenance, and Monitoring Plan.
 - A report dated December 17, 2007 presenting the Second Semiannual 2006 Interim Measures Groundwater Monitoring results.
 - A letter dated December 19, 2007 providing copies of new access agreements for offsite access requirements.
2. The U.S. EPA was copied on the following correspondence submitted by Chevron to other parties in the 4th quarter of 2007:
- A report dated October 23, 2007 sent to Mr. John Barlage of Hamilton County Environmental Services presenting the quarterly report for the HSVE system.
 - A report dated December 17, 2007 sent to Mr. Harold O'Connell of the Ohio EPA presenting the 2006 Annual Groundwater and Soil Monitoring Report for the RCRA Land Treatment Unit.
 - A memo dated October 3, 2007 sent to the Chevron CAP members presenting the September monthly facility update.
 - A memo dated November 14, 2007 sent to the Chevron CAP members presenting the October monthly facility update.
 - A memo dated December 13, 2007 sent to the Chevron CAP members presenting the November monthly facility update.
3. Chevron received the following correspondence from the U.S. EPA and/or the Ohio EPA in the 4th quarter of 2007:
- A permit modification dated November 1, 2007 from Ohio EPA approving the NPDES permit modification that was requested.
 - A letter dated November 15, 2007 presenting U.S. EPA's approval with modifications of the Operation, Maintenance, and Monitoring Plan & the Remedy Implementation Plan for the Final Groundwater Remedy.
4. On October 6th, Chevron sponsored a household hazardous waste collection truck in conjunction with the Whitewater Township community cleanup day. Chevron personnel also assisted the citizens of Hooven by hauling off waste material that was placed along the curbs in Hooven.
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 4th quarter of 2007:
- Trigger level monitoring and operation of the HSVE and Gulf Park Bioventing systems.

- Monitoring and implementation for hi-grade groundwater recovery.
 - Groundwater sampling for the 2nd 2007 IM monitoring program (included initial sampling of newly installed sentinel and POC wells).
 - ROST transect monitoring.
7. The soils remedy project was largely completed in the 2nd quarter of 2007. However, soil confirmation samples revealed that more excavation was required at the former Elco processing area. A total of 5,711 tons of soil was shipped in 246 truckloads to the Waste Management Stony Hollow facility in Dayton, Ohio for disposal during the 4th quarter. Confirmation samples of the re-excavated areas were collected and analyzed, and the results showed that cleanup criteria had been met. It is anticipated that excavation and subsequent backfill of the former Elco processing area will be completed in the 1st quarter of 2008.
- Backfill of the other excavation areas was recommenced during the 4th quarter of 2007. 122,462 tons of backfill was imported in 6,947 truckloads from the local gravel company, and directly placed in the open excavation areas. Clean stockpiled soils were also used to backfill excavation areas. It is anticipated that backfilling of the excavation areas will also be completed in the 1st quarter of 2008.
8. The Gulf Park Bioventing system remained operational until December 26th, when it was shut down due to groundwater levels rising above the trigger level.
9. The Hooven HSVE system remained operational until December 27th, when it was shut down due to groundwater levels rising above the trigger level.
10. The water treatment system remained in dual train operation throughout the 4th quarter of 2007.
11. Hi-Grade recovery operations began on June 20th with production well PROD_19 as the primary recovery well. On November 9th, operation began of new production well PROD_24, located in Hooven at the former Bell Industries building. Other production wells, including PROD_12, PROD_20, PROD_21, and PROD_23 have been used for Hi-Grade recovery operations. Through the end of December, 80,873 gallons of hydrocarbon have been recovered.
12. The initial round of ROST screening was completed the week of December 10th to confirm that the transects which were drilled earlier in the year had been properly located across the down-gradient edge of the plume. As discussed in Section 4.2 of the Remedial Implementation Plan, the initial round of ROST screening determined the location of the edge of the smear zone, and thus the proper location for the three permanent well locations in each transect. Results of the initial round of ROST screening will be included in the first semiannual report to be submitted after the second quarter of 2008.
13. The final Interim Measures groundwater sampling event was conducted during the 4th quarter of 2007. In accordance with the AOC, interim measures were to continue until the RIP/OMM plans were finalized and approved. With U.S. EPA approval of the plans on November 15th, Chevron will

begin the implementation of the RIP/OMM plans, including shutting down the historical operation of the groundwater containment pumps. Once the 2007 hi-grade season has been completed, the pumps and the water treatment system will be shut down, in accordance with paragraph 11.b of the AOC.

14. 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:

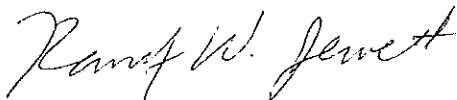
December 11th ~1410-1440 (power failure)

Planned Activities – 1st Quarter 2008

1. The following monitoring and fieldwork activities are planned:
 - Shutdown of groundwater recovery operations, after the hi-grade season.
 - Gulf Park system trigger level monitoring and operation, if appropriate.
 - Hooven HSVE system trigger level monitoring and operation, if appropriate.
 - Bi-monthly groundwater monitoring.
 - Quarterly groundwater monitoring (of the newly installed sentinel and POC wells).
 - River observations and surface water sampling.
2. Final excavation, 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,



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

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

500-017-010

cc: Harold O'Connell – OEPA