



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

October 1, 2009

Chris Aneiros
Chevron Environmental Management Company
4800 Fournace Place E542B
Bellaire, Texas 77401

RE: Chevron Products Company – Cincinnati Facility
NPDES Permit 11G00000*FD
Compliance Evaluation Inspection

Dear Mr. Aneiros:

On September 30, 2009, Ned Sarle and I performed a NPDES permit compliance evaluation inspection at the ground water treatment system for the Chevron Products – Cincinnati facility located at 5000 State Route 128 in Hooven, Ohio. Dale Barrett with TriHydro accompanied us on this inspection. I have attached a copy of the inspection report and findings for you to review. All areas evaluated received a satisfactory rating.

I understand you will be sending a response to the effluent limit violation from June 2009. If you have any questions regarding the inspection, please call me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

cc: Dale Barrett, TriHydro Corporation

Summary of Findings/Comments

Permit Compliance

During the review period of 1/1/2009-9/1/2009 there was one effluent limit violation noted at outfall 003. It occurred on June 4, 2009 for Total suspended solids daily concentration. 68 mg/l was reported on the DMR and the limit is 45 mg/l. Our office did not receive a non-compliance notification as required by the permit. A response to this non-compliance is required.

Self-Monitoring Program: Flow Measurement

During the review period of 1/1/2009-9/1/2009 the average flow rate from the treatment wetlands through outfall 003 was 1.7 MGD. We understand that the facility increases groundwater pumping rates during "high grade" times of the year when the ground water table is low and free product is easier to remove. During these optimal pumping times the flow rate increases. The average flow rate for August 2009 was 3.5 MGD.

Effluent/Receiving Water Observations

A slight VOC odor was noted at the discharge point from the outfall 003 channel to the Great Miami River.

Other Comments

During the site visit, the sheet pile barrier along the Great Miami River near outfall 002 was observed. We noted the monitoring wells along the sheet pile were placed up gradient and down gradient of this barrier at varying ground depths.

We also observed large vernal pools that have been engineered with various habitat in the areas of prior soil excavation areas (SWMUs). We were told Jim Myers of Chevron was the project leader regarding the vernal pools. We would be interested in being kept informed regarding any studies done on the vernal pools.



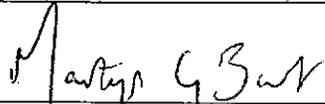
State of Ohio Environmental Protection Agency
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NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IG00000*FD	OH0009326	9/30/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Chevron Products Company Cincinnati Facility 5000 State Route 128, Cleves, Ohio	10:00 am	11/1/2007
	Exit Time	Permit Expiration Date
	11:30 am	12/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dale Barrett, TriHydro, Environmental Technician	(513) 353-1323 x 32	
Name, Address and Title of Responsible Official	Phone Number	
Chris Aneiros Chevron Environmental Management Company 4800 Fournace Place E542B Bellaire, Texas 77401	(713) 432-2749	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	S	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached Summary of Findings sheet.	
Inspector	Reviewer
 Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
10/1/09 Date	10/2/09 Date

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Permit Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

(a) 1 effluent limit violation noted during review period of 1/1/2009-9/1/2009
At outfall 003, on June 4, 2009, TSS daily concentration of 68 mg/l exceeded the limit of 45 mg/l. We did not receive a non-compliance notification regarding the cause.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Routine and preventative maintenance scheduled/performed... Y
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained.... Y
- (g) Any plant bypasses since last inspection..... N
- (h) Regulatory agency notified of bypasses..... N/A
On MORs and/or Spill Hotline (1-800-282-9378)
- (i) Any hydraulic and/or organic overloads since last inspection..... N

Section H: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration:)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

During the review period of 1/1/2009-9/1/2009 the average flow rate from outfall 003 was 1.7 MGD. The facility pumps and treats groundwater during lower groundwater levels in order to capture free product. During these optimal pumping times the flow rate increases. The average discharge flow rate for August 2009 was 3.5 MGD.

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y

Section H: Self-Monitoring Program (cont.)

- (i) Samples refrigerated during compositing..... Y
- (ii) Proper preservation techniques used..... N/E
- (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... N/E
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. N/E
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... N/E
 - (c) Analyses being performed more frequently than required by permit. N
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: all

Lab name: Test America

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... N/E
 - (g) Satisfactory calibration and maintenance of instruments/equipment. N/E
 - (h) Adequate records maintained..... N/E
 - (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
- Date: N/A

Comments/Status:

Section I: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
003	no	no	no	no	no	no	no	voc odor
002	No	no	no	no	no	no	no	no flow

Comments/Status:

I observed the area along the Great Miami River that had been installed with sheet pile barrier and monitoring wells (near outfall 002). I also observed large areas of vernal pools that have been engineered in the soil excavation areas of the site.

Section J: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

