



*Transmitted via email*

February 10, 2011

Mr. James K. Moore, P.E.  
Illinois Environmental Protection Agency  
1021 N. Grand Avenue East  
Springfield, IL 62794-9276

**Subject: Vapor Intrusion Investigation  
Shell Oil Products US, Roxana, Illinois**

Dear Mr. Moore:

On behalf of Shell Oil Products US (SOPUS) and pursuant to the discussion at our meeting in Roxana on January 25, 2011, URS Corporation (URS) requests the following modification to the requirements set forth in the November 15, 2010 letter from the Agency.

We propose to modify Condition #15 to “All summa canisters which complete their 24-hour sample collection period must be sent to the laboratory for analysis. At a minimum, samples will be shipped twice per week.”

As we discussed, holding samples for a day or two, under proper custody, does not compromise the quality of the sample. This modification however, provides more flexibility in the sample collection process and increases efficiency.

In addition, we wish to clarify several logistical issues related to sampling:

- As was discussed, we plan to seal sub-slab soil-gas probes using modeling clay. This has proved to be a highly effective sealant at other sites and is believed to be less prone to leakage than cement seals. If the probes are converted to permanent sampling locations at some future date, cement or another suitable sealant will be employed.

The question arose during our meeting as to whether this was consistent with ITRC guidance. The ITRC document addresses sub-slab sampling on pages D-16 and D-17, but makes no mention of specific materials for achieving a seal. Mr. Eklund was one of the authors of the ITRC document and attests that use of clay sealants is an accepted approach among soil-gas sampling experts. The use of various sealants other than cement is explicitly allowed in the New York Soil Vapor Intrusion Guidance (October 2006) – see Section 2.7.2 (page 22).

- As was discussed, we plan to perform a vacuum leak check on every sampling train. This is already in our established protocol. An additional (secondary) leak check will be

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performed using helium tracer gas at a minimum of 10% of the sub-slab soil-gas sampling locations. For the helium leak checks, the procedure will be the same as used previously at the site during the VMP sampling.

We look forward to working with you on this study. If you have any questions or comments regarding sampling and analytical issues, please feel free to contact Bart Eklund of URS at 512-419-5436.

Sincerely,

A handwritten signature in black ink that reads "Robert B. Billman". The signature is written in a cursive style.

Robert B. Billman  
Senior Project Manager

Cc: Kevin Dyer, SOPUS  
Chris Cahnovsky, IEPA  
Dave Webb, IDPH