



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

April 12, 2013

Kevin Dyer  
Shell Oil Products US  
17 Junction Drive PMB 399  
Glen Carbon, Illinois 62034

7010 2780 0002 1165 2073

Return Receipt Requested

**RECEIVED**  
**APR 16 2013**

RE: Request for Performance Test  
I.D. 119090AAO

Dear Mr. Dyer:

Pursuant to Section 4 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/4, and 35 Ill. Adm. Code 201.282, the Illinois Environmental Protection Agency ("Illinois EPA") is requiring that Shell Oil Products US perform emissions testing to measure benzene and volatile organic material ("VOM") emissions at the inlet and outlet of the regenerative thermal oxidizer ("RTO") during operation of the soil vapor extraction system ("SVE") within 90 days of receipt of this letter. This emission testing shall be performed in accordance with USEPA reference methods 1-4, 18 or another approved method(s). The testing shall be conducted at a range of combustion chamber temperatures that will be based on minimum, normal, and maximum combustion chamber temperatures since the SVE with the RTO began operation. The purpose of emissions testing is to establish a minimum acceptable temperature for the combustion chamber and ensure compliance with permitted emission limits, applicable emission standards prescribed by the federal Clean Air Act ("CAA"), the Act, and regulations promulgated thereunder.

At least 45 days prior to testing, a test plan shall be submitted to the Illinois EPA for approval. A submittal of less than 45 days may be approved in writing by the Compliance Section Manager provided it does not interfere with the Illinois EPA's ability to review the protocol prior to testing. This test plan shall describe the specific procedures for testing, including as a minimum:

- i. The company who will be performing sampling and analysis and their experience with similar tests.
- ii. A detailed description and listing of the emission units and air pollution control equipment to be tested and the specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of actual operating practices and the means by which the operating parameters for the emission unit and any air pollution control equipment will be determined (e.g. continuously monitor and record the combustion chamber temperature in accordance with 35 Ill. Adm. Code 219.105(d)(2)(A) and (B)).
- iii. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations.

- iv. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based.
- v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- vi. Any proposed use of an alternative test method, with detailed justification.
- vi. The format and content of the source test report.
- viii. The anticipated date and time testing will begin.

Confirmation of the exact date and time of the test shall be made five days prior to the actual test date in order to enable Illinois EPA representatives to witness the test.

Test results shall be submitted within 60 days of the test date. The test results shall include at a minimum:

- i. A descriptive and table summary of results.
- ii. General information including, but not limited to, the name, location, and identification of the emission unit(s) tested, date(s) of testing, names of personnel and entities performing the tests, and Illinois EPA observers, if any.
- iii. Description of test procedures and method(s), including description and map of emission unit(s) and sampling points, sampling train, testing and analysis equipment, and test schedule.
- iv. Detailed description of test conditions, including:
  - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information, i.e., mode(s) of operation e.g. type and amount of fuel consumed, process rate/throughput;
  - B. Air pollution control equipment information, i.e., equipment condition and operating parameters during testing; and
  - C. A discussion of any preparatory actions taken, i.e., inspections, calibration, maintenance, and repair.
- iv. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

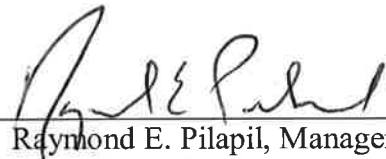
Identification of the applicable regulatory standards/permit conditions that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards/permit conditions and a statement whether the test(s) demonstrated compliance with the applicable standards/permit conditions.

- v. An explanation of any discrepancies among individual tests, failed tests, or anomalous data.
- vi. The results and discussion of all quality control evaluation data, including a copy of all quality control data.
- viii. The applicable operating parameters of the air pollution control equipment during testing (temperature, time of operation, etc.).

The stack test notifications, test plan, and test results shall be submitted to Raymond Pilapil, Illinois EPA, Bureau of Air, Compliance Section, P.O. Box 19276, Springfield, Illinois, 62794-9276; with a copy sent to Kevin Mattison, Illinois EPA, Bureau of Air, Compliance Section (Third Floor), 9511 Harrison Street, Des Plaines, Illinois 60016 and Jeff Benbenek, Field Operation Section, 2009 Mall St., Collinsville, IL 62234.

Questions regarding the required testing or testing procedures should be directed to Grover Hopkins at 847-294-4024.

Sincerely,



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Raymond E. Pilapil, Manager  
Compliance Section  
Bureau of Air

REP:GEH

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bc: BOA/FOS/Collinsville Regional Office  
BOA/Compliance Section/SMU-Springfield  
BOA/Compliance Section/SMU-Des Plaines  
ID File – Springfield  
Correspondence File  
David Bloomberg  
Steve Youngblut  
Julie Armitage  
Jeff Benbenek  
John Waligore