



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/524-3300
October 26, 2010

URS CORPORATION

Certified Mail
7008 1830 0001 4712 3533
7008 1830 0001 4712 3540

OCT 26 2010

Shell Oil Products US
Attn: Mr. Kevin Dyer
17 Junction Drive
PMB #399
Glen Carbon, Illinois 62034

RECEIVED WRB Refining LLC Wood River Refinery
Attn: Mr. David Dunn
900 South Central Avenue
P.O. Box 76
Roxana, Illinois 62084

Re: 1191150002 -- Madison County
Equilon
ILD080012305
Log No. B-43-CA-14; B-43-CA-15
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Dunn:

This is in response to Mr. Dyer's June 23, 2009 submittal, and a July 8, 2009 submittal made on behalf of Shell Oil Products US (SOPUS) by Robert B. Billman, URS. These submittals included: (1) request for clarification on select conditions within the previously issued May 12, 2009 letter (Log No. B-43-CA-12); and (2) an expanded Water Well Survey (WWS) for the investigation area. The two (2) submittals are identified below:

Submittal No. 1 – A document entitled, "Correspondence of May 12, 2009", dated June 23, 2009, and received by the Illinois EPA June 26, 2009 (Log No. B-43-CA-14); and

Submittal No. 2 – An untitled document, containing an Expanded Water Well Survey, dated July 8, 2009, and received by the Illinois EPA July 13, 2009 (Log No. B-43-CA-15).

On May 12, 2009, Illinois EPA approved a plan for conducting an investigation in the area mentioned above which includes: (1) the area around a groundwater monitoring well referred to as "P-60" (which is a part of the groundwater monitoring/remediation system associated with the RCRA permit for the Equilon facility); and (2) the area in the vicinity of the 1986 benzene release from an underground pipe near the intersection of Illinois Route 111 and Rand Avenue.

The Illinois EPA has determined that, with regards to groundwater, it can approve the subject documents with the conditions and modifications below:

1. The issuance of this letter will not: (1) resolve any of the facility's alleged violations of the Illinois Environmental Protection Act and/or 35 Ill. Admin. Code 620 regulations as

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set forth in Violation Notice L-2008-01134; and (2) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the aforementioned alleged violations.

2. SOPUS has properly interpreted the groundwater portions of: Condition 3.a(2)c; Condition 3.g; and Condition 15 of the May 12, 2009 letter (Log No. B-43-CA-12).
 - a. Regarding Condition 3.a(2)c; the Illinois EPA was referring to “3.a.ii”; however, Section 7 of the Workplan states that Polycyclic Aromatic Hydrocarbons (PAHs) will be sampled accordingly.
 - b. Regarding Condition 3.g; the language on Page 3, Paragraph 3 stating that the Illinois EPA “can” approve the request is reciprocal to “is” approving the request.
 - c. Regarding Condition 15; the Illinois EPA concurs that the facility must send a formal request for any scheduling changes.
3. The Expanded WWS is adequate to determine that no known public or private drinking water supplies are currently at risk, and Condition 3.h of the May 12, 2009 letter (Log No. B-43-CA-12) has been satisfied.
4. Groundwater conditions and modifications to the Revised Workplan dated January 21, 2009, as initially stated in the May 12, 2009 letter are listed below:
 - a. The Illinois EPA acknowledges that free product removal via the pump installed at well P-60 is serving as an interim measure at this time, and the following conditions and modifications apply:
 - i. The pump at well P-60 must be maintained until such time that a permanent product recovery system(s) is installed at the site, or the Illinois EPA determines product removal is no longer necessary.
 - ii. Pursuant to 35 Ill. Adm. Code 724.201(c), SOPUS is not relieved of addressing potentially impacted groundwater conditions beyond the facility boundary, subsequent to any investigation of the WRR property. If needed, the facility must implement corrective action beyond the facility property boundary, where necessary to protect human health and the environment and will not be relieved of responsibility to cleanup a release that has migrated beyond the facility boundary where off-site access is denied.


- b. If free product is discovered by SOPUS outside of the WRR property boundaries: (1) the Illinois EPA must be notified in writing within seven (7) days; (2) the notification must also include a timeline for submittal of a remediation method proposal; and (3) a request to meet with the Illinois EPA to discuss the issue within thirty (30) days of the completion of field activities.
5. The facility remains subject to all requirements of the May 12, 2009 letter, unless otherwise modified above.

This letter shall constitute Illinois EPA's final decision on the subject submittal. Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

If you have any questions regarding the groundwater aspects of this letter, please contact Amy Boley at 217/558-4716; questions regarding other aspects of this letter should be directed to James K. Moore, P.E. at 217/524-3295.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

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Jun IBM AMB
cc: Robert Billman, URS