



December 5, 2014

Mr. Stephen Nightingale, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794

**Subject: Request to Reduce Routine Gauging
Roxana, Illinois
119115002 – Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
Log No. B-43R-CA-33, CA-48**

Dear Mr. Nightingale:

URS Corporation (URS), on behalf of Shell Oil Products US (SOPUS), requests to reduce the frequency of groundwater gauging at monitoring wells in the Roxana Interim Groundwater Monitoring Program (Program) from weekly/monthly to quarterly. Condition 2 of the Illinois Environmental Protection Agency's (IEPA's) letter dated July 18, 2013, requires a certain subset of monitoring wells in the Program to be gauged on a weekly basis based on light non-aqueous phase liquid (LNAPL) observations and/or elevated photoionization detector (PID) readings. Condition 2 also requires a different subset of monitoring wells in the Program to be gauged on a monthly basis and all monitoring wells in the Program to be gauged on a quarterly basis.

SOPUS has indicated in the January 23, 2013, *Update to February 4, 2011 Groundwater Flow Control Notification, Updated Response to Violation Notice L-2011-01126 & Request to Reduce Groundwater Gauging Frequency*, and continues to demonstrate through the *Interim Groundwater Monitoring Reports* for Roxana, Illinois and *Semi-Annual Groundwater Monitoring Reports* for WRB Refining LP Wood River Refinery (WRR) that groundwater capture has been and continues to be maintained along the west fenceline of North Property.

During a September 4, 2014 meeting with IEPA, URS and SOPUS demonstrated that the presence of LNAPL along the WRR west fenceline is sporadic and related to water levels. **Attachment 1**, from the meeting presentation, contains LNAPL and groundwater plots for selected ROST-4-series wells. **Attachment 2** contains LNAPL and groundwater plots for selected monitoring wells along the west fenceline, which have periodically displayed LNAPL.

The results of the weekly and monthly gauging events have been reported in the *Interim Groundwater Monitoring Program Reports* for 3rd Quarter 2013 through 3rd Quarter 2014 (Table 1b in the reports). These results further illustrate the sporadic nature of the presence of LNAPL and elevated PID readings at these monitoring wells.



Mr. Stephen Nightingale
Illinois Environmental Protection Agency
December 5, 2014
Page 2

Based on the above information, SOPUS believes it is no longer necessary to continue gauging monitoring wells on a weekly and/or monthly basis. SOPUS requests the IEPA's concurrence to stop weekly and monthly gauging, and return to quarterly gauging as required by the RCRA Permit.

If you have any questions during your review, please contact Kevin Dyer, SOPUS Sr. Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob.billman@urs.com (314/743-4108).

Sincerely,

URS Corporation, on behalf of Shell Oil Products US

Wendy Pennington, PE
Project Engineer

Robert B. Billman
Senior Project Manager

Enclosures: RCRA Corrective Action Certification Form
Attachment 1 Depth to LNAPL and Groundwater Plots – ROST-4 Series Wells
Attachment 2 Depth to LNAPL and Groundwater Plots – WRR Fenceline Wells

cc: Kevin Dyer, SOPUS
Eric Petersen, P66
Amy Boley – IEPA, Springfield
Gina Search – IEPA, Collinsville
Shannon Haney – Greensfelder, Hemker & Gale P.C.
Village of Roxana (Repository)
Repository - Roxana Public Library



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

ILLINOIS EPA RCRA CORRECTIVE ACTION CERTIFICATION

This certification must accompany any document submitted to Illinois EPA in accordance with the corrective action requirements set forth in a facility's RCRA permit. The original and two copies of all documents submitted must be provided.

1.0 Facility Identification

Name Wood River Refinery County Madison
 Street Address 900 South Central Ave Site No. (IEPA) 1191150002
 City Roxana, IL Site No. (USEPA) ILD080012305

2.0 Owner Information

Name Not Applicable
 Mail Address _____
 City _____
 State _____ Zip Code _____
 Contact Name _____
 Contact Title _____
 Phone _____

3.0 Operator Information

Name Equilon Enterprises LLC dba SOPUS
 Mail Address 17 Junction Drive; PMB #399
 City Glen Carbon
 State IL Zip Code 62034
 Contact Name Kevin Dyer
 Contact Title Senior Principal Program Manager
 Phone 618-288-7237

4.0 Type of Submission (check applicable item and provide requested information, as applicable)

RFI Phase I Workplan/Report IEPA Permit Log No. B-43R
 RFI Phase II Workplan/Report Date of Last IEPA Letter on Project July 18, 2013
 CMP Report; Log No. of Last IEPA Letter on Project B-43R-CA-33, CA-48
 Other (describe): Request to Reduce Routine Gauging Does this submittal include groundwater information: Yes No
 Date of Submittal December 5, 2014

5.0 Description of Submittal: (briefly describe what is being submitted and its purpose)

Letter requesting to reduce the routine gauging that was outlined by the Agency in their 7/18/14 letter.

6.0 Documents Submitted (identify all documents in submittal, including cover letter; give dates of all documents)

Request to Reduce Routine Gauging letter; Attachments 1 and 2; RCRA Corrective Action Certification Statement.

7.0 Certification Statement

(This statement is part of the overall certification being provided by the owner/operator, professional and laboratory in Items 7.1, 7.2 and 7.3 below). The activities described in the subject submittals have been carried out in accordance with procedures approved by Illinois EPA. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For: Request Reduce Routine Gauging

Date of Submission: December 5, 2014

7.1 Owner/Operator Certification

(Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126.) All submittals pertaining to the corrective action requirements set forth in a RCRA Permit must be signed by the person designated below (or by a duly authorized representative of that person):

1. For a Corporation, by a principal executive officer of at least the level of vice president.
2. For a Partnership or Sole Proprietorship, by a general partner or the proprietor, respectively.
3. For a Governmental Entity, by either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

1. the authorization is made in writing by a person described above; and
2. the written authorization is provided with this submittal (a copy of a previously submitted authorization can be used).

Owner Signature: _____ Date: N/A

Title: Not Applicable

Operator Signature: *Kevin Ely* Date: 12/3/2014

Title: Senior Principal Program Manager

7.2 Professional Certification (if necessary)

Work carried out in this 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. No one is relieved 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44 (h))

Professional's Signature: _____ Date: _____

Professional's Name _____

Address _____

Professional's Seal:

City _____

State _____ Zip Code _____

Phone _____

7.3 Laboratory Certification (if necessary)

The sample collection, handling, preservation, preparation and analysis efforts for which this laboratory was responsible were carried out in accordance with procedures approved by Illinois EPA.

Name of Laboratory _____

Date: _____

Signature of Laboratory Responsible Officer

Mailing Address of Laboratory

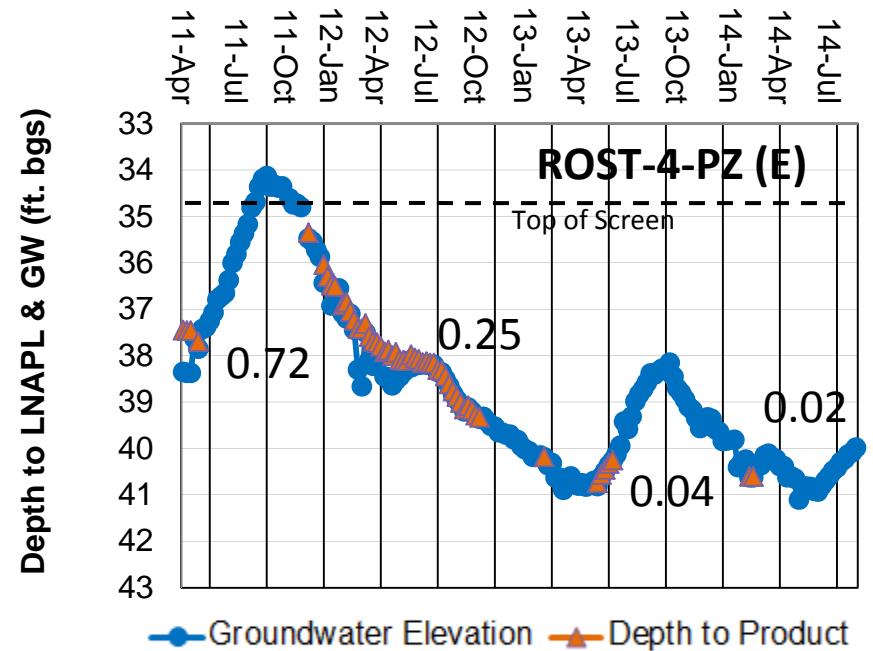
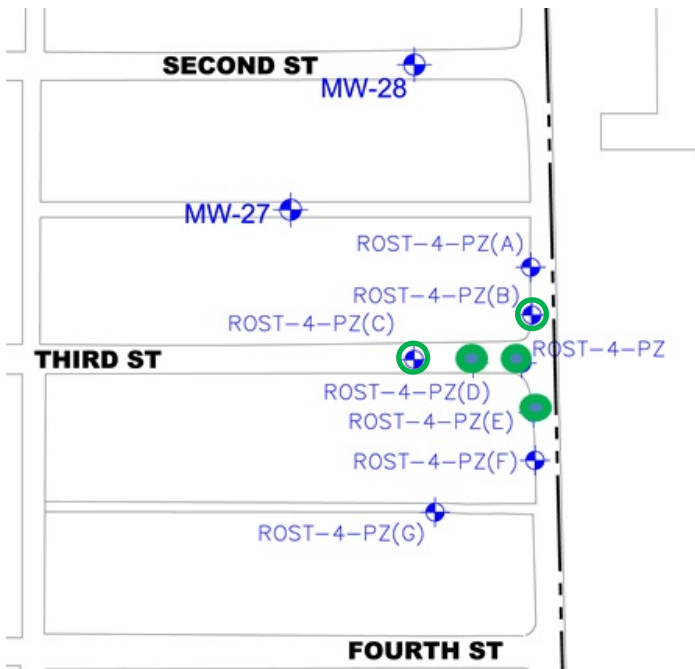
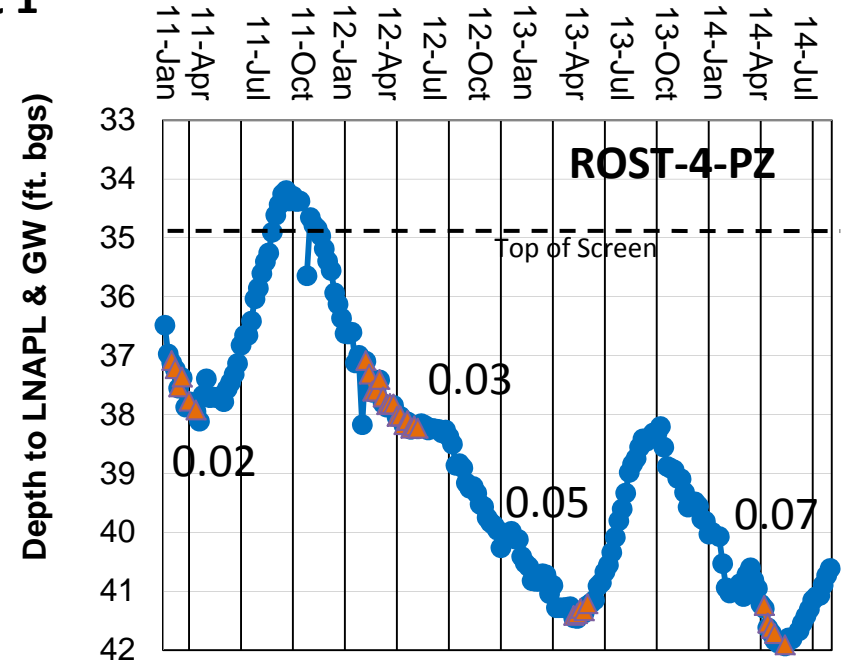
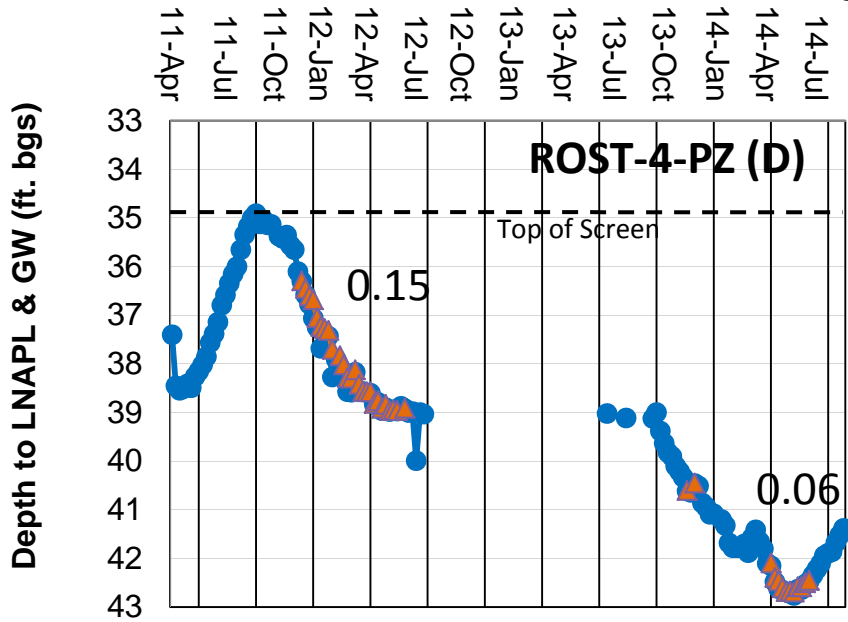
Address _____

City _____

Name and Title of Laboratory Responsible Officer

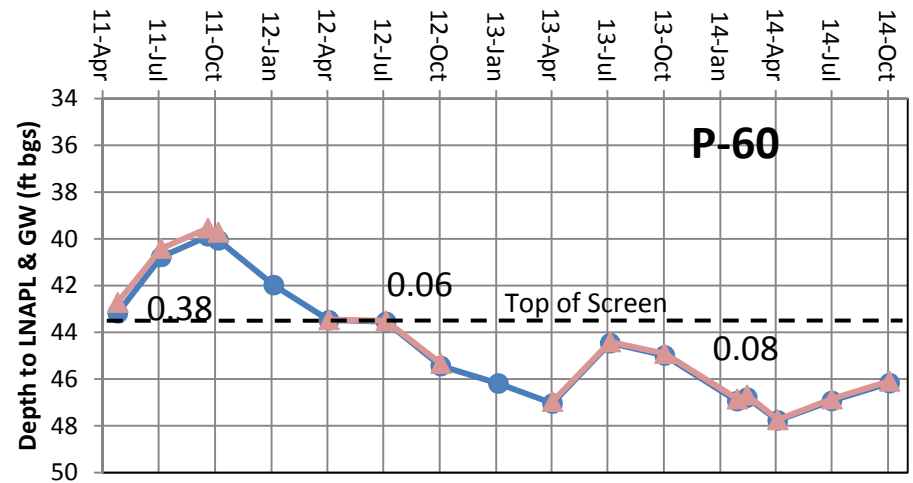
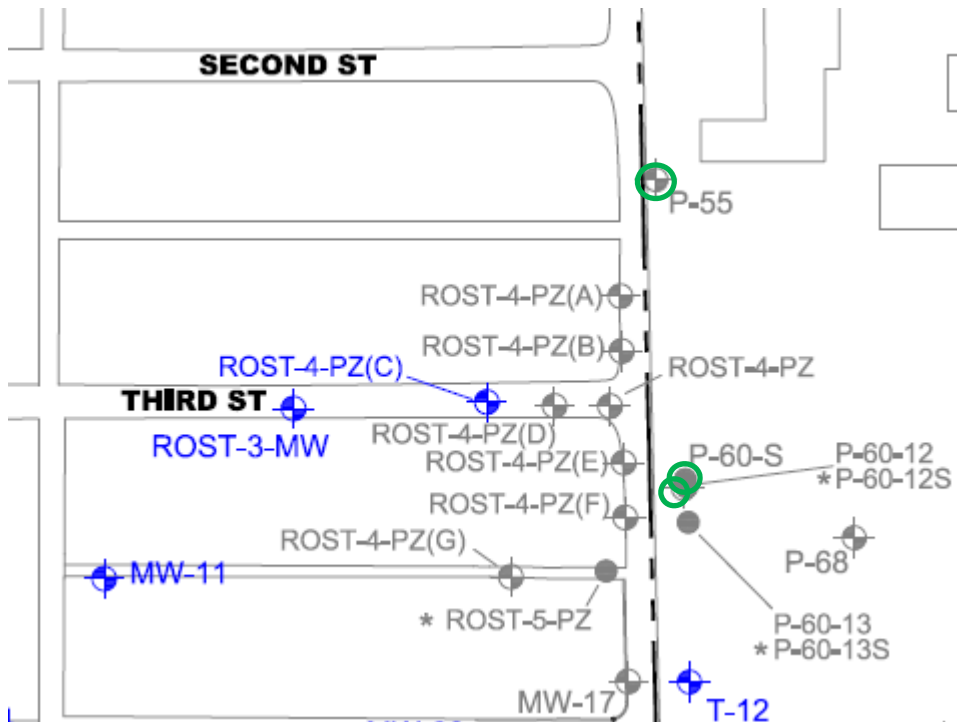
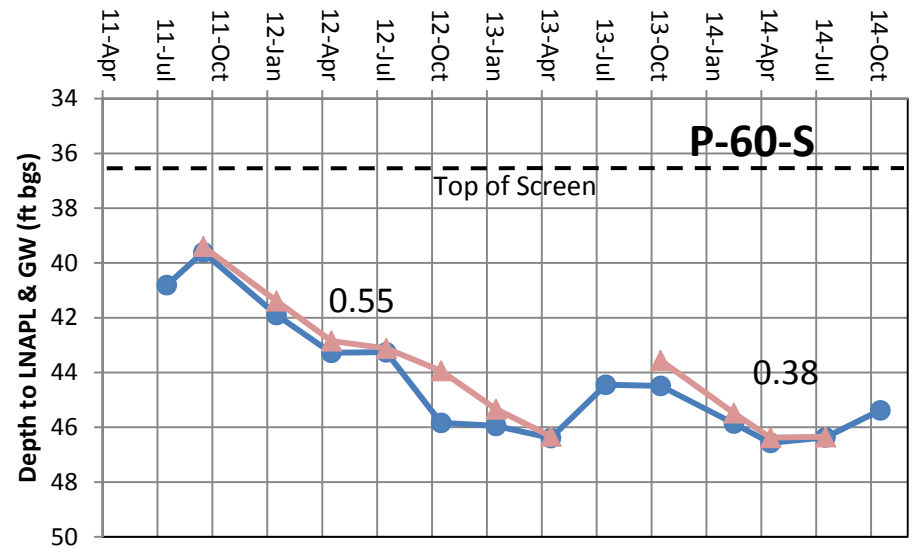
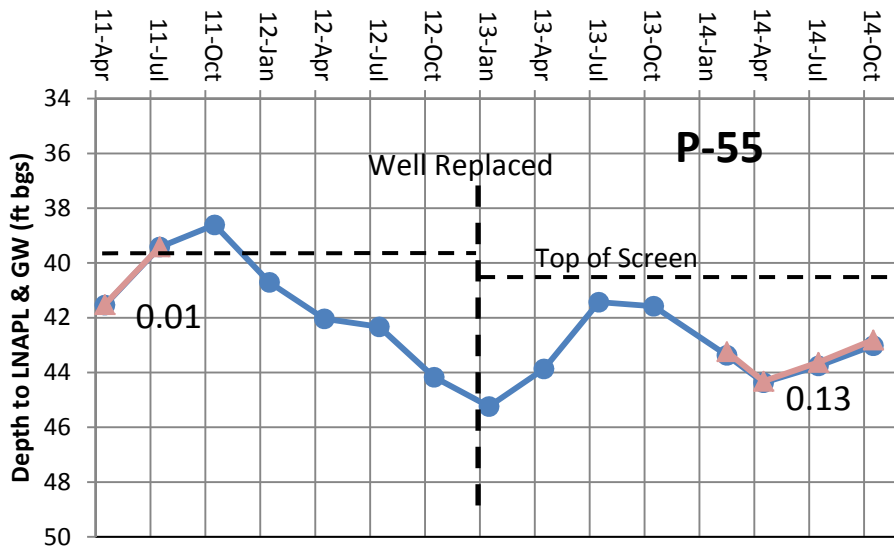
State _____ Zip Code _____

Attachment 1



NOTE: Numbers shown on charts are average LNAPL thickness observed during the indicated time period.

Attachment 2



● Groundwater Elevation ▲ Depth to Product

NOTE: Numbers shown on charts are average LNAPL thickness observed during the indicated time period.