



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

217/524-3300

August 2, 2017

CERTIFIED MAIL

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Shell Oil Products US
Attn: Mr. Kevin Dyer
17 Junction Drive
PMB #399
Glen Carbon, Illinois 62304

WRB Refining LLC
Wood River Refinery
Attn: Brian Wulf, Environmental Director
900 South Central Avenue
P.O. Box 76
Roxana, Illinois 62084



Re: 1191150002 - - Madison County
Equilon DBA Shell Oil Products
ILD080012305
Log No. B-43R-CA-83
Received: December 8, 2014
RCRA Permit
Permit CA

BY: _____

Dear Mr. Dyer and Mr. Wulf:

A technical review has been completed for the groundwater portions of the subject submittal entitled, Request to Reduce Routine Gauging”, dated December 5, 2014 and submitted by Ms. Wendy Pennington, P.E., and Mr. Robert Billman of AECOM on behalf of Shell Oil Products US (SOPUS) at the Wood River Refinery (WRR) in Roxana, Illinois. The subject submittal was reviewed as corrective action modification requests to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR. SOPUS and Phillips 66 maintain the Permit for the WRR, which was first issued on September 29, 1989.

The subject submittal requests a reduction in gauging frequency for groundwater monitoring wells within the Interim Groundwater Monitoring Network. The most recent change to gauging frequency was issued in a July 18, 2013 Illinois EPA letter (Log Nos. B-43R-CA-33, CA-45, and CA-48), which approved a reduction in the list of wells to be gauged weekly, designated a new list of wells to be gauged monthly, and the remaining wells were to be gauged quarterly. Specifically, ROST-3-MW, all ROST-4-PZ area wells, MW-19, and MW-22 were required to have weekly gauging, based on product being detected, photoionization detector (PID), and/or lower explosive limit (LEL) readings.

Based on a review of the subject submittal and quarterly reports from 2016, the Illinois EPA can approve the request to reduce gauging frequencies from weekly or monthly to quarterly at Interim Groundwater Monitoring Program wells, with the following conditions and modifications:

1. The extent of groundwater contamination has been defined and gauging data from weekly, monthly, and quarterly time frames are consistent with each other; therefore, quarterly gauging is adequate to capture the observed groundwater and LNAPL fluctuations. A quarterly versus semi-annual schedule remains necessary to observe the seasonal fluctuations and detect any changes within the residential area.
2. The groundwater monitoring wells ROST-4-PZ-G and ROST-4-PZ-E must be added to the list of wells sampled quarterly for groundwater quality. This determination is based on the approval to reduce gauging frequency in the ROST-4-PZ area, and their location and gauging history.
3. If groundwater conditions change and it is determined additional gauging is necessary, the facility must submit a modification request for the Interim Groundwater Monitoring Program for Illinois EPA review and approval.
4. The facility remains subject to the monitoring and reporting requirements for the interim network as defined in previous Illinois EPA letters. RCRA corrective action activities carried out at the facility including off-site activities as necessary, must meet the requirements of: (1) 35 Ill. Admin. Code 724.201; (2) the facility's Permit; and (3) Illinois EPA letters regarding such activities.

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 Act of 1989, the Professional Geologist Licensing Act and the Structural Engineering Act of 1989. This letter does not relieve anyone from compliance with these laws. All work that falls within the scope and definition of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation to the appropriate regulating authority.

Should you have any questions regarding groundwater-related matters associated with this project, please contact Amy Boley at 217/524- 4716; questions regarding other aspects of this project should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,



Joyce L. Munie, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

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