



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

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217/524-3300

April 8, 2013

CERTIFIED MAIL

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

WRB Refining LLC Wood River Refinery
Attn: Mr. Mike Bechtol
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-38 and CA-41
Received: May 15, 2012; and July 17, 2012
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Bechtol:

This is in response to two (2) documents submitted on behalf of Shell Oil Products US (SOPUS) by URS Corporation (URS), with regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois. The submittal is associated with corrective action requirements for delination of groundwater contamination present within the Village of Roxana, and an established Interim Groundwater Monitoring Network. The document was reviewed as a corrective action modification request to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

Submittal No. 1 – (Log No. B-43R-CA-38); A document entitled, “Groundwater Monitoring Program – 4th Quarter 2010”, dated May 14, 2012, and received by the Illinois EPA May 15, 2012. In accordance with Condition 1 of the Illinois EPA letter dated February 14, 2012 (Log No. B-43R-CA-26 and 29) and to satisfy Condition 5 of the Illinois EPA letter dated June 16, 2011 (Log No. B-43R-CA-1,3,5,6,7,8,10,11 and PS11-032), SOPUS submits revised Figures 6 through 10 for the 4th Quarter 2010.

Submittal No. 2 – (Log No. B-43R-CA-41); A document entitled, “Groundwater Monitoring Program – 2nd Quarter 2012”, dated July 13, 2012, and received by the Illinois EPA July 17, 2012. SOPUS submits the quarterly report to meet the requirements of the Interim Groundwater Monitoring Network.

The subject submittals are approved with regards to groundwater, subject to the conditions and modifications listed below.

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1. The ROST-4-PZ area and P-60 area wells require a section be added within future reports for discussion of these areas in more detail, which includes but is not limited to:
 - a. A discussion of irregular potentiometric contours in the ROST-4-PZ area and P-60 area wells.
 - i. The groundwater contour for elevation 404.00 and 404.50 ft above mean sea level (ft MSL) are depicted following the property line, which is highly unlikely;
 - ii. Differences in elevations of approximately one-foot in some cases were measured between wells in very close proximity.
 - b. Discussions must utilize any gauged location necessary for the evaluation, not only those where sampling is required, to provide a complete picture of what is known for areas of concern.
 - c. Multiple locations are gauged weekly, including the ROST-4-PZ area, yet the majority of the data is neither reported nor discussed. SOPUS must provide a section which evaluates gauging data collected on a more frequent based (currently weekly) within each quarterly report. The discussion must include gauging elevations and FPH detections, photoionization detector (PID) readings and any exceedances of the lower explosive limit (LEL) collected at groundwater monitoring well locations during gauging and/or sampling.
2. 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.
3. A completed RCRA Corrective Action Certification form must accompany all submittals made to the Illinois EPA regarding RCRA corrective action activities.

Work required by this letter, your modification requests 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.

Page 3

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

AMB JCM TBM
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cc: Robert Mooshegian, URS
Eric Peterson, ConocoPhillips