



DEC 26 2007

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Mr. James Moore
Bureau of Land
Illinois Environmental Protection Agency
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Springfield, Illinois 62702

Shell Oil Products US
Environmental Services
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PMB #399
Glen Carbon, Illinois, 62034
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December 20, 2007

Re: Response to Incident Numbers 2006-1012 and 2006-1020
1191150002 – Madison County
Equilon Enterprises LLC
Compliance/RCRA Permit

Dear Mr. Moore:

Shell Oil Products U.S. (SOPUS) is submitting this letter in response to the recent call we had on December 12, 2007 discussing remedial efforts for the benzene detected in groundwater in the vicinity of the 1986 release (northwest corner of Route 111 and Rand Avenue).

It would appear that the presence of benzene in groundwater in this area is at least in part related to the 1986 benzene release. SOPUS currently is planning to conduct additional work to supplement data collected in 2006 and prior, to better understand the potential sources and distribution of benzene in groundwater in the immediate area. The work is tentatively scheduled for mid to late January and consists of the following types of activities: groundwater profiling, piezometer installation and gauging, vapor point sampling, etc. The mid to late January schedule could be delayed if the agency would like to receive and review a work plan prior to the start of work, or if there are delays in such areas as obtaining site access, contractor availability and/or weather conditions.

The results of this work and other currently available information will be used to help refine the conceptual site model for the subject area and evaluate any potentially complete exposure pathways (e.g., vapor inhalation). For example, it will be important to confirm that groundwater beneath the area is within the refinery's groundwater capture zone, as current information supports. SOPUS plans to present the results of this work and planned remedial efforts.

We would like to meet with you to discuss the planned activities and the regulatory framework (e.g., potential modification of the RCRA permit) prior to implementation of the January fieldwork.

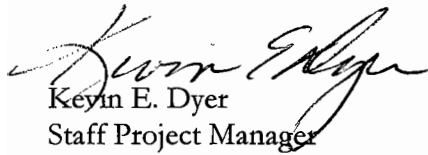


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If you should have any question, please contact me at kevin.dyer@shell.com or (618) 288-7237.

Sincerely,

SHELL OIL PRODUCTS US


Kevin E. Dyer
Staff Project Manager

Cc: Herb Hand, SOPUS
Robert Billman – URS
Eric Petersen, ConocoPhillips