

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: WRB Refining LP - Wood River Refinery County: Madison
Street Address: 900 South Central Ave. Site No. (IEPA): 1191150002
City: Roxana, IL 62084 Site No. (USEPA): ILD 080 012 305

2.0 OWNER INFORMATION

Name: Not Applicable

Mailing Address: _____

Contact Name: _____

Contact Title: _____

Phone No.: _____

3.0 OPERATOR INFORMATION

Equilon Enterprises LLC d/b/a Shell Oil Products US

17 Junction Drive, PMB #399

Glen Carbon, IL 62034

Kevin Dyer

Principal Program Manager

618-288-7237

4.0 TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)

- RFI Phase I Workplan/Report
 RFI Phase II Workplan/Report
 CMP Report; Phase _____
 Other (describe):

Oil recovery system letter

Date of Submittal July 12, 2012

IEPA Permit Log No. B-43R

Date of Last IEPA Letter

on Project March 14, 2012

Log No. of Last IEPA

Letter on Project B-43R-CA-25

Does this submittal include groundwater information: Yes No

5.0 DESCRIPTION OF SUBMITTAL: (briefly describe what is being submitted and its purpose)

Description of procedures to be implemented in the event of an extended outage of the oil recovery system.

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

RCRA Corrective Action Certification and letter dated July 12, 2012.

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.

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) _____

Title: _____

Operator Signature: *Aurisa Edger* _____ 7/12/12 (Date) _____

Title: 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.

Professional's Signature: _____ Date: _____

Professional's Name: _____

Professional's Seal:

Professional's Address: _____

Professional's Phone No.: _____

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 _____

Signature of Laboratory _____ Date _____
Responsible Officer

Mailing Address of Laboratory _____

Name and Title of Laboratory Responsible Officer _____



July 12, 2012

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

**Subject: 1191150002 – Madison County
Equilon Enterprises
Roxana, Illinois
ILD080012305
Log No. B-43R-CA-25**

Dear Mr. Nightingale:

On behalf of Shell Oil Products US (Shell), URS Corporation (URS) is responding to Condition 6 of the subject March 14, 2012 Agency letter. This condition requested “*alternative procedures that are to be implemented in the event that the free product recovery system has an extended or planned outage of the system, to ensure system operation continues in an alternate manner, or resumes with existing equipment.*”

For the purpose of this request, an “*extended or planned outage*” to be one where the System is out of service for a period of time greater than six months. The system's primary components include the oil recovery wells, Tank F-67, the NESHAPs Header, and associated piping. Tank F-67 is the only primary component of the system that could necessitate an extended or planned outage.

In the event that an extended outage were to occur, Phillips 66 would notify Shell, who would in turn notify the Illinois EPA (IEPA) via telephone followed by a paper report, documenting the event that required the extended outage, the actions required to repair the system, and the planned implementation of the alternative procedures.

The alternative procedures would consist of temporary components that would be mobilized to the site and connected to bypass and serve in place of Tank F-67. The temporary components could consist of the following:

- 20,000 gallon double-walled frac tanks
- Oil-water separators
- Associated pumps and piping
- Electrical services, as necessary.

This system would tie-in to the NESHAPs discharge line downstream of Tank F-67.

1001 Highland Plaza Drive West, Suite 300
St. Louis, MO 63110
Phone: 314.429.0100
Fax: 314.429.0462



Mr. Stephen Nightingale, P.E.
Illinois Environmental Protection Agency
July 12, 2012
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If you have any questions or require additional information, please contact Kevin Dyer, Shell Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob.billman@urs.com (314/743-4108).

Sincerely,

A handwritten signature in blue ink that reads "Robert B. Billman".

Robert B. Billman
Senior Project Manager

Cc: Kevin Dyer, Shell
Amy Boley, IEPA
Eric Petersen, Phillips 66
Project file