



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR ALEC MESSINA, ACTING DIRECTOR

217/524-3300

July 27, 2016



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-63
Received: July 30, 2013
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Wulf:

A review has been completed for the subject submittal entitled, "Response to Illinois EPA Letter Dated April 8, 2013; Groundwater Conditions near East 3rd and Chaffer Streets", dated July 29, 2013, and received by the Illinois EPA July 30, 2013. The subject submittal was prepared and submitted on behalf of Shell Oil Products US (SOPUS) by Robert B. Billman of URS Corporation (URS). SOPUS and Phillips 66 maintain a Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the Wood River Refinery (WRR) issued on September 29, 1989. The subject submittal was reviewed as a corrective action modification request to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

The subject submittal responds to an Illinois EPA letter dated April 8, 2013 (Log Nos. B-43R-CA-38 and CA-41), and presents an interpretation of the potentiometric contours in the ROST-4-PZ area and P-60 area wells. The subject submittal can be approved with the following conditions and modifications:

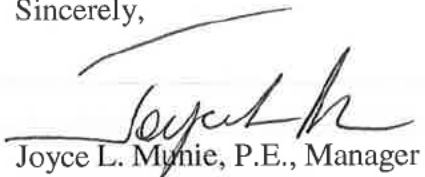
1. To address the potentiometric high in the northern portion of the Study Area, a proposal must be submitted within 120 days, and it must include, at a minimum:
 - a. A proposal to install an adequate number of nested wells to monitor the extent of the low-permeability zone. SOPUS must propose to add the nested wells to the Interim Groundwater Monitoring Network.

- b. The nested wells must be adequate to verify groundwater quality, flow directions, and hydraulic gradients that show pumping overcome potential radial flow.
2. In addition to the information being provided in tables within the Interim Groundwater Monitoring Program reports, SOPUS must add a text section to provide a more detailed discussion of the ROST-4-PZ area and P-60 area wells, including but not limited to, a discussion of the potentiometric surface in this area for the subject reporting period.
 3. 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.
 4. 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 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. Munnie, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

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