



CONOCO PHILLIPS

NOV 19 2007

RECEIVED

UPS Overnight Delivery
Tracking# 1Z 297 R0A 22 1000 3207

Mr. James Moore
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

Shell Oil Products US
Environmental Services
17 Junction Drive
PMB #399
Glen Carbon, Illinois, 62034
Tel (618) 288-7237
Fax (618) 288-7451
Email kein.dyer@shell.com
Internet <http://www.shell.com>

November 16, 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 comments received from the Agency, in a letter dated September 17, 2007. The Agency's letter was issued to WRB Refining LLC and SOPUS in regards to the August 4, 2006 and August 9, 2006 releases from ConocoPhillips' pipelines as well as the discovery of benzene in groundwater in the vicinity of the releases. Specifically, this letter addresses the benzene, which has been detected in groundwater near the intersection of Illinois Route 111 and Rand Avenue. The presence of benzene may in part be related to a 1986 benzene release at the northwest corner of Route 111 and Rand Avenue. A brief summary of the release and subsequent mitigation efforts was presented in ConocoPhillips' letter to the Agency dated October 31, 2007 (subject "Regional Groundwater Contamination").

SOPUS has been working to understand the source and distribution of benzene in groundwater in the release area; some of the activities included the following:

- Soil vapor probes were installed in 2000 to assess the potential for vapor migration in the area. The results of this work indicated benzene vapors were primarily limited to the immediate vicinity of the benzene line. More recently, vapor probes at three locations adjacent to the Village of Roxana's wastewater treatment facility were sampled in 2004, prior to planned construction work to install a new lift station. The results of this sampling were non-detect for benzene (and other petroleum constituents). The Village of Roxana is aware of the presence of benzene in groundwater and, to date, there have not been any complaints of odors or community concerns.
- In 2006, various field techniques were used to investigate the occurrence and distribution of benzene in groundwater. This work was initiated based on increased benzene concentrations observed in ConocoPhillips' P-93 monitoring well nest, believed to result from groundwater being drawn toward the refinery pumping centers. The results of this work were submitted to the Agency in a report dated September 28, 2007. This work helped



Mr. James Moore
Illinois Environmental Protection Agency
November 16, 2007
Page 2 of 2

further the understanding of the distribution of benzene in groundwater between the 1986 release site and the refinery.

- In early 2007, ConocoPhillips conducted investigations related to their August 2006 releases, and identified benzene in groundwater in the subject area. The results of this work were submitted to the Agency on May 20, 2007. One of the conclusions in the report was that groundwater in the vicinity of the releases is within the capture zone of the refinery's groundwater pumping wells (i.e., flow toward the north-northeast).

Currently, efforts are underway to refine the conceptual site model for the subject area based on available information. This effort is in part to understand whether other sources are contributing to the observed groundwater impacts, since the influence of ConocoPhillips' groundwater capture zone appears to extend beyond their facility boundaries.

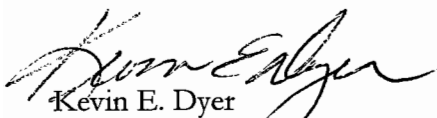
Once we have refined the conceptual site model, we plan to conduct investigative work to provide data for potentially complete exposure pathways. For example, it will be important to confirm that groundwater beneath the area is within the refinery's groundwater capture zone, as current information supports. The Agency suggested modifying the RCRA permit, to provide a framework for conducting these activities. We would like to discuss this further with you, to understand what would be involved.

Once the Agency has reviewed this letter and our September 28th report, we suggest a meeting to discuss the next steps.

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