



September 20, 2010

Ms. Amy Boley
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794

**Subject: Request for Schedule Extension
Roxana, Illinois
1191150002 -- Madison County
Equilon Enterprises**

Dear Amy:

Per our communications on September 16, 2010, URS Corporation (URS), on behalf of Shell Oil Product US (SOPUS), requests an extension to certain conditions contained in the Agency's letter to SOPUS dated August 5, 2010. In an email dated September 16th, 2010, you indicated this request letter should include a brief summary of the work performed since submittal of the investigation report February 18, 2010.

The following work has been conducted since the report was submitted:

- The *Dissolved Phase Groundwater Investigation and P-60 Free Phase Product Delineation Report* for Roxana, Illinois (dated February 2010) was posted to the website repository on May 5, 2010.
- Field investigation activities that were presented as recommendations in the February 2010 report were conducted during June 2010. This work consisted of the following activities:
 - Borings GP-3 and GP-5, previously planned, were completed (soil and groundwater sampling) once access was obtained from the Village of Hartford.
 - Existing wells and piezometers in the Village of Roxana and along the west fenceline of the Wood River Refinery (WRR) were gauged periodically to evaluate the absence or presence of light non-aqueous phase liquid (LNAPL).
 - A 4-inch diameter monitoring well was installed at the location of piezometer P-60-11, near existing well P-60.
 - Monitoring well locations in Roxana were gauged in conjunction with the WRR groundwater monitoring program to continue to build the groundwater data set to assess seasonal fluctuations.
 - Four vapor monitoring ports were installed at various locations to depths of 5 to 10 feet below ground surface to assess potential vapors at these depths: ports at VMP-3 and -17 as recommended in the report; and VMP locations 18 and 19 based on subsequent evaluations.



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- The report of this supplemental work (*Addendum to February 2010 Report – Supplemental Investigation Activities*) was submitted to IEPA on September 20, 2010.
- The IEPA provided comments on the February 2010 report in a letter dated August 5, 2010. SOPUS has or is conducting the following work related to this letter:
 - The 3rd quarter sampling of existing vapor monitoring points was conducted in August-September (Comment 3).
 - The *Vapor Intrusion Investigation Workplan* was developed and submitted to the Agency on September 20, 2010 (Comment 4).
 - We have met with ConocoPhillips and requested tank inspection records to help provide additional information with respect to potential releases from tanks and pipelines near the west fenceline (Comment 5).
 - Planning activities related to additional groundwater delineation work (Comments 6 and 10). Field sampling activities are being conducted the week of September 20th.
 - Developing a project schedule for the various work activities included in IEPA's comments.
 - Developing preliminary responses to IEPA's comments.
 - Preliminary discussions and evaluations concerning a soil vapor extraction (SVE) system to control the primary vapor sources, located inside the WRR and the Public Works yard (Comment 15).

This request for extension specifically concerns Comments 5 and 7(c) in the Agency's August 5th letter. These comments pertain to information concerning pipelines along the west fenceline and installation of monitoring wells in Roxana, respectively. We request an additional 45 days to complete these activities (new due date November 3).

If you have any questions please contact Kevin Dyer, SOPUS project manager at (618) 288-7237 or Kevin.dyer@shell.com or me at (314) 743-4108 or bob_billman@urscorp.com.

Sincerely,

Robert B. Billman
Senior Project Manager

cc: Kevin Dyer, SOPUS