



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

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SEP 02 2011

217/524-3300

August 31, 2011

CERTIFIED MAIL

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Shell Oil Products US
Attn: Mr. Kevin Dyer
17 Junction Drive
PMB #399
Glen Carbon, Illinois 62034

WRB Refining LLC Wood River Refinery
Attn: Mr. Mike Bechtol
900 South Central Avenue
P.O. Box 76
Roxana, Illinois 62084

Re: 1191150002 -- Madison County
Equilon
ILD080012305
Log Nos. B-43R-CA-21
Received: July 18, 2011
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Bechtol:

This is in response to the document submitted on behalf of Shell Oil Products US (SOPUS) by URS Corporation (URS), with regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois. The submittal was prepared in response to investigative activities associated with corrective action efforts for contaminated groundwater and potential free product (a.k.a. free phase hydrocarbons) within the Village of Roxana, and along the west fence line of the North Property WRR, and portions of the WRR near the Roxana Public Works Yard. A review of the subject submittal entitled, "Groundwater Sampling – Second Quarter 2011", dated July 15, 2011, has been completed.

The document is submitted to satisfy quarterly reporting requirements for groundwater data collected in accordance with approved interim groundwater monitoring network for the Village of Roxana investigations. The Illinois EPA has determined that the subject submittal does not fully satisfied the reporting requirements outlined in Condition 5 of the June 16, 2011 Illinois EPA letter (Log Nos. B-43R-CA-1; CA-3; CA-5; CA-6; CA-7; CA-8; CA-10; CA-11; and PS11-032). The reporting requirements are stated below, and the following conditions and modifications must be met:

1. At a minimum, the following additional information must be included within all groundwater reporting submitted to the Illinois EPA for the WRR and the Interim Groundwater Monitoring Program for the Village of Roxana:

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 608-3131

Bureau of Land -- Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-5463

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

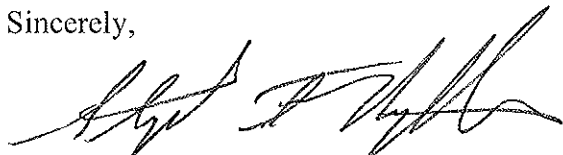
- a. The facility must depict both the dissolved and free product plumes. Isoconcentration maps must be created, as well as spider diagrams depicting site-wide contamination.
 - b. Reduce the groundwater and product contour interval to 0.50 ft contours to better demonstrate an inward gradient and define the free product plume, respectively. The groundwater elevations and product measurements must be depicted at each well used to create the maps. Any measured product must be depicted on product maps.
 - c. Geologic cross-sections must be constructed which depict: (1) the dissolved contamination; (2) screened intervals of the monitoring wells, production wells, and oil recovery wells; and (3) groundwater and product elevations, within each cross-section.
 - d. Utilize nested well sets across the site to evaluate the individual zones via discussions and maps in order to better delineate the zone or zones where the vertical and horizontal extent of free product and dissolved contamination exists.
2. Within ninety (90) days, the groundwater data for the First and Second Quarters of 2011 must be resubmitted, in accordance with Condition 1 above, for Illinois EPA review and approval.

This letter shall constitute Illinois EPA's final decision on the subject submittal. Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

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 Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone 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.

If you have any questions regarding the groundwater aspects of this letter, please contact Amy Boley at 217/558-4716; questions regarding other aspects of this letter should be directed to James K. Moore, P.E. at 217/524-3295.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

^{AMB}
SFN:AMB:mls/111362s.doc

cc: ^{JKN} Robert Billman, URS
^{BM} Eric Peterson, WRB Refinery