



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/524-3300

November 25, 2014

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CERTIFIED MAIL

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BY:-----

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. 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-70
Received: September 11, 2013; November 15, 2013
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Wulf:

This is in response to the groundwater portions of the two subject submittals identified below. The submittals were prepared and submitted on behalf of Shell Oil Products US (SOPUS) by Robert B. Billman of URS Corporation (URS), with regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois, and the Interim Groundwater Monitoring Network within the Village of Roxana, Illinois:

Submittal No. 1 – An extension request dated September 10, 2013 and received by the Illinois EPA September 11, 2013. The submittal requests a 60-day extension for submittal of the plan provided as Submittal No. 2 below.

Submittal No. 2 – A document entitled, “Proposed Plan for Groundwater Corrective Action”, dated November 14, 2013, and received by the Illinois EPA November 15, 2013. The plan was prepared to satisfy the requirements of Condition 3 of the Illinois EPA letter dated July 18, 2013 (Log No. B-43R-CA-33, 45, and 48).

SOPUS and Phillips 66 maintain a Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the Wood River Refinery (WRR), first issued on September 29, 1989. The subject submittals were reviewed as corrective action modification requests Permit.

1. Based on information provided and at the September 4, 2014 meeting, the Illinois EPA can approve the proposed plan, on an interim basis, with the following conditions and modifications:

- a. The First Quarter 2015 groundwater samples obtained from: (1) the current monitoring well network; (2) the four (4) new wells required by the modified permit issued June 13, 2014 (Log Nos. B-43R-M-9,10,11,12,13, and 15); and (3) the new well required by the October 9, 2014 letter (Log No. B-43R-CA-47), must be used in a demonstration to verify the extent of groundwater contamination has been delineated. This demonstration must be submitted by June 1, 2015; or
 - b. If SOPUS cannot define the extent of contamination, as required by Condition 1.a above, a proposal for additional investigation must be submitted by June 1, 2015.
2. In order for a statistical method to be considered an approved tool in evaluating corrective action effectiveness for the program, the method must be presented for Illinois EPA review and approval. Such a proposal must include supporting documentation for the statistical method. Therefore, the Illinois EPA cannot consider the trend diagrams as evidence that the corrective measures are effective in improving groundwater quality and that the dissolved plume is shrinking.
3. As discussed in the September 4, 2014 meeting, the use of transmissivity for the purposes of LNAPL removal is premature at this time. 35 Ill. Adm. Code Part 742 requires corrective action measures to remove any free product to the maximum extent practicable. The Illinois EPA does not consider LNAPL transmissivity to be a corrective action, rather it is considered to be one line of evidence towards demonstrating that LNAPL has been removed to the extent practicable. Therefore, the Illinois EPA does not concur with the statement on Page 3 of the submittal, "*LNAPL removal will be performed based on the ITRC LNAPL transmissivity principles and methodologies. LNAPL recovery may be discontinued at some time in the future if transmissivity values decrease to a point where recovery is no longer practicable.*" The removal of LNAPL remains subject to the requirements of 35 Ill. Adm. Code Parts 724, 742, and 620.
4. As approved with the issuance of the Permit dated June 13, 2014 (Log No. B-43R-M-9,10,11,12,13, and 15), flowmeters are not necessary at this time.
5. Any LNAPL and its thickness must also be measured during required gauging events.
6. 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.
7. 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 modification requests 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

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AMB JKH BTH