



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

APR 08 2025

9589 0710 5270 0389 7043 67

Shell Oil Products US
Attn: Leroy Bealer
128 East Center Street
Nazareth, PA 18064-2145

Re: 1191150002 -- Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
ILD080012305
Log No. B-43R-CA-111
RCRA Permits - 24A
Permit CA

Dear Mr. Bealer:

This is in response to a letter entitled, "Response to IEPA 3/13/2023 Revised Permit Letter with SOP Updates" submitted by AECOM Technical Services on behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell), dated May 26, 2023, and received by the Illinois EPA on May 30, 2023. The subject submittal contains four (4) amended standard operating procedures (SOPs) written in response to Condition 5 of the Illinois EPA's letter dated March 13, 2023 (Log No. B-43R-CA-99,100,101,103,104,105). The request was assigned as Log No. B-43R-CA-111.

Some of the soil and groundwater at the Village of Roxana, Illinois site was contaminated with benzene from a pipeline release that occurred to the northwest of the intersection of Rand Avenue and Route 111, and to the west of the Wood River Refinery (WRR) North Property West Fence line. To help remediation efforts, a set of SOPs were conceived on January 21, 2009, in a work plan titled, "Dissolved Phase Groundwater Investigation and P-60 Free Phase Product Delineation Work Plan" (Log No. B-43-M-23) with an additional set of SOPs added on March 29, 2011, in another workplan titled "Work Plan, Vapor Intrusion Investigation" (Log No. B-43R-CA-20).

The subject submittal provided minor revisions to SOPs 5 (Utility Clearance Procedures), 25 (Sample Container, Preservation, and Holding Times), and 44R (Soil Vapor Purging and Sampling), while introducing a newly developed SOP to summarize the safe handling and disposal of investigation derived wastes (IDWs), SOP 16 (Investigation Derived Waste Handling).

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115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

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2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Based on the Illinois EPA's review of the subject submittal, the updated SOPs 5 and 25 are hereby approved. SOPs 16 and 44R are conditionally approved with the following conditions and modifications:

1. The level of personal protection equipment (PPE) must be enhanced for the nature of the work appropriate to perform the requirements written in SOP 16. Current equipment does not encompass hazards from interacting with IDW equipment such as 55-gallon drums, safety risks such as splash contamination, and airborne hazards from toxic or flammable fumes.
2. Under SOP 16, the Illinois EPA can accept the proposed usage of plastic sheeting for containing liquid IDW spills. However, a strong reliable secondary containment or equipment like a drum spill pallet must be provided to contain any additional hazardous splash contaminations.
3. The central accumulation area indicated in SOP 16 under Section 4, General Information, requires the usage of ventilation within the designated secure storage area in accordance with OSHA 1926.57 or otherwise demonstrate concentration limits not exceeding OSHA 1926.55(a).
4. In SOP 16, the central accumulation area must identify any incompatible hazards derived from IDWs and specify taken steps to separate wastes during storage and transportation.
5. Under Section 4 of SOP 16, a waste sampling program must be created to enforce a consistent schedule for laboratory analysis of generator knowledge IDWs to confirm prior characterizations of a generated residual.
6. SOP 4, Decontamination, must be referenced in Sections 2 and 5 of SOP 16 when discussing the decontamination of expendable materials in the event of contact with hazardous waste.
7. A site coordinator designated to oversee the proper disposal of IDW containers shall create a plan to ensure that waste does not remain on-site for more than 90 days.
8. The soil gas samples collected in accordance with SOP 44R and screened using SOP 52 (Soil Vapor Field Laboratory Screening) must include sample analysis for tracer gas used during sampling.
9. A revised and completed set of the facility's SOP 16 and 44R, must be submitted as an addendum to the RCRA modification application (Log No. B-43R-CA-111) dated May 26, 2023, within sixty (60) days of the date of this letter. In the cover letter of the submittal, any changes made from the current approved version must be clearly indicated.

This letter shall constitute Illinois EPA's final decision on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90

days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue
Post Office Box 19276
Springfield, IL 62794-9276
217/782-5544

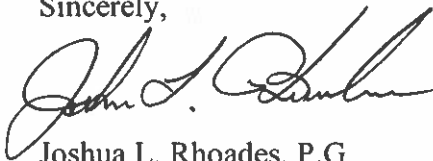
For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, IL 60605-1241
312/814-3620

Work required by this letter, 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.

For questions regarding the groundwater aspects of this project, please contact Dana Austin, P.G., at 217/785-7427 or dana.austin@illinois.gov. For all other questions, please contact Gary Ko at 217/557-1434 or gary.ko@illinois.gov.

Sincerely,



Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

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GBK TNH

Cc: Wendy Pennington, P.E., AECOM
Samuel Fisher, CHMM, AECOM