



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-524-3301

AUG 01 2023

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

7022 2410 0001 5387 9490

7022 2410 0001 5387 9506

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

Wood River Refinery
Attn: Thomas Morgan, Environmental Dir.
900 South Central Avenue
P.O. Box 76
Roxana, IL 62084

RE: 1191150002 – Madison County
Equilon Enterprises LLC dba Shell Oil Products US
ILD080012305
Log No. PS23-032
RCRA Permit (24A)
PS Correspondence

Mr. Bealer and Mr. Morgan,

This is in response to the correspondence entitled, "Notice of Water Production Well W-85 Damage," dated July 6, 2023, and received on July 10, 2023. The correspondence was provided to Illinois EPA regarding RCRA corrective action activities at the above-referenced RCRA permitted facility and was submitted by AECOM. The document was submitted as notification in accordance with Condition IV.D.4 of the Permit.

The Illinois EPA has reviewed the correspondence and has the following comments:

1. Given the proximity to the Village of Roxana and the inability to operate groundwater production well W-85, the frequency for groundwater monitoring, well gauging, and reporting must be increased immediately to a monthly schedule for all groundwater monitoring wells in the Interim Groundwater Monitoring Network. Reports must include adequate text, figures, and tables to demonstrate the required groundwater gradient is being maintained. Reports must be provided no later than the first calendar day of each month. All future correspondence and monthly reporting regarding this matter must include the "RCRA Facility Groundwater, Leachate and Gas Reporting Form" (LPC-592) and provide wet signatures. This form may be found at the Illinois EPA's website.
2. The actions described in Comment 1 above must continue until groundwater production well W-85 has been replaced and is capable of operating and contributing to the required combined minimum pumping rate of 3,000 gallons per minute. The final monthly report must indicate the date the well is returned to service and this requirement is met.
3. The following comments address groundwater production well W-85 and its replacement:

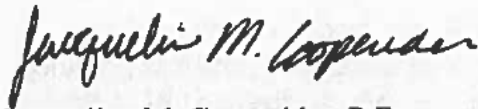
2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

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

- a. Condition IV.D.4 of the Permit requires notification be provided in writing within thirty (30) days if any of the wells are damaged or the structural integrity has been compromised. The July 3, 2023 submittal was not provided within thirty (30) days of when the well was determined damaged on March 9, 2023.
- b. While the potential locations for the well are provided, per Condition IV.D.5 of the Permit, the well is not considered a replacement well if more than ten (10) feet from the existing well; therefore, this well location must be approved by the Illinois EPA and designated as a new well. The proposal must demonstrate the new location will allow continued control of the groundwater gradient along the western fence line. Submit this modification request within forty-five (45) days as a Class 1* permit modification request in accordance with Section IV.K of the Permit.

Any general questions regarding this letter can be directed to Visal Poornaka at (217) 558-4717. Groundwater related questions regarding this letter can be directed to Amy Butler at (217) 558-4716.

Sincerely,



Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

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AMB JR TWH

cc: Leroy Bealer (electronic copy)