



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

ILLINOIS EPA RCRA CORRECTIVE ACTION CERTIFICATION

This certification must accompany any document submitted to Illinois EPA in accordance with the corrective action requirements set forth in a facility's RCRA permit. The original and two copies of all documents submitted must be provided.

1.0 Facility Identification

Name Equilon Enterprises LLC d/b/a/ SOPUS County Madison
 Street Address 900 South Central Ave Site No. (IEPA) 1191150002
 City Roxana Site No. (USEPA) ILD080012305

2.0 Owner Information

Name _____
 Mail Address _____
 City _____
 State _____ Zip Code _____
 Contact Name _____
 Contact Title _____
 Phone _____

3.0 Operator Information

Name Equilon Enterprises LLC d/b/a/ SOPUS
 Mail Address 128 East Center Street
 City Nazareth
 State PA Zip Code 18064
 Contact Name Leroy Bealer
 Contact Title Senior Program Manager
 Phone 484-632-7955

4.0 Type of Submission (check applicable item and provide requested information, as applicable)

RFI Phase I Workplan/Report IEPA Permit Log No. B-43R
 RFI Phase II Workplan/Report Date of Last IEPA Letter on Project August 22, 2024
 CMP Report; Log No. of Last IEPA Letter on Project B-43R-CA-116, CA-117
 Other (describe): Roxana SEE System Winter Shutdown Request Does this submittal include groundwater information: Yes No
 Date of Submittal December 13, 2024

5.0 Description of Submittal: (briefly describe what is being submitted and its purpose)

Request to shutdown Roxana SEE system for Winter months 2024-2025 due to safety concerns.

6.0 Documents Submitted (identify all documents in submittal, including cover letter; give dates of all documents)

Cover letter, RCRA Corrective Action Certification, and FPWY SEE System 2024-2025 Winter Operations Plan.
Copy of submittal also sent directly to Dana Austin, Kihyun Cho, and Ali Al-Janabi of IEPA.

For: Roxana SEE System Winter Shutdown Request

Date of Submission: December 13, 2024

7.0 Certification Statement

(This statement is part of the overall certification being provided by the owner/operator, professional and laboratory in Items 7.1, 7.2 and 7.3 below). The activities described in the subject submittals have been carried out in accordance with procedures approved by Illinois EPA. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

7.1 Owner/Operator Certification

(Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126.) All submittals pertaining to the corrective action requirements set forth in a RCRA Permit must be signed by the person designated below (or by a duly authorized representative of that person):

1. For a Corporation, by a principal executive officer of at least the level of vice president.
2. For a Partnership or Sole Proprietorship, by a general partner or the proprietor, respectively.
3. For a Governmental Entity, by either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

1. the authorization is made in writing by a person described above; and
2. the written authorization is provided with this submittal (a copy of a previously submitted authorization can be used).

Owner Signature: _____ Date: _____
 Title: _____
 Operator Signature: _____ Date: 12-12-2024
 Title: Senior Program Manager

7.2 Professional Certification (if necessary)

Work carried out in this 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. No one is relieved 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44 (h))

Professional's Signature: Wendy Pennington Date: 12-13-2024
 Professional's Name Wendy Pennington
 Address 100 N. Broadway, 20th Floor Professional's Seal:
 City St. Louis
 State MO Zip Code 63102
 Phone 314-452-8929



For: Roxana SEE System Winter Shutdown Request

Date of Submission: December 13, 2024

7.3 Laboratory Certification (if necessary)

The sample collection, handling, preservation, preparation and analysis efforts for which this laboratory was responsible were carried out in accordance with procedures approved by Illinois EPA.

Name of Laboratory NOT APPLICABLE

Date: _____

Signature of Laboratory Responsible Officer

Mailing Address of Laboratory

Address _____

City _____

Name and Title of Laboratory Responsible Officer

State _____ Zip Code _____



AECOM
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20th Floor
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December 13, 2024

Mr. Joshua Rhoades
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Land Pollution Control – Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62702

**Former Public Works Yard Steam Enhanced Extraction System
2024-2025 Winter Operations Plan
Roxana, Illinois
1191150002 – Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
Log No. B-43R-CA-116, CA-117**

Dear Mr. Rhoades:

AECOM Technical Services, Inc. (AECOM), on behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell), is submitting this winter operations plan related to the Steam Enhanced Extraction System (SEE) System in Roxana, IL for the 2024-2025 winter season.

The SEE system was shut down on October 21, 2024, due to equipment failure. Following the SEE system shut down, AECOM proceeded to work with the system vendor (McMillan McGee) to address the equipment failure and the SEE system, generally as noted below. Also, an assessment of the risks associated with operating the SEE through the cold winter months has been performed. It was concluded that attempting to winterize the many components, hoses, pipes, and tanks of the SEE system to minimize freeze damage risks to an acceptable level would not be possible. Additionally, the safety concerns listed below associated with winter operation are such that the potential risks to onsite personnel are not acceptable.

SEE System Winter Startup Concerns

- The SEE system would need to be winterized in order to operate through the winter months. Winterization of this thermal system would have been potentially feasible, if the system components and site subsurface had operated for a period of time, delivering sufficient energy (i.e. steam/heat) to the subsurface, prior to when the winter cold/freezing temperatures are experienced.
- Even if full winterization is completed at this time of year, there are still risks of equipment damage due to freezing, as it is not possible to insulate 100% of the system. A multi-day hard freeze, without substantial energy in the subsurface, would likely cause freezing damage to some system components, especially narrow diameter lines. If an unanticipated shutdown were to occur during a hard freeze, many components would be at risk of damage, regardless of winterization measures. A multi-day hard freeze or ice storm may also prevent staff from traveling to the site, which could result in a catastrophic failure of the system.
- Safety concerns –
 - ▶ The nature of the SEE system and the tight site layout are such that there are numerous lines and hoses running across the ground, and secondary containments

around every process unit. During snowy/icy conditions, the risk of tripping and falling would increase significantly.

- ▶ There is the potential of a scenario where a system alarm may require the operator to travel to the site during off-business hours. If such an alarm occurred in the middle of the night during a winter storm, travel to/from the site would be dangerous, as would performing repairs and walking around the site in snow and ice.
- ▶ It is possible a scenario could happen where if a power outage or system alarm occurs during dangerous winter conditions, a choice would need to be made between allowing the system to sit idle until site conditions improve and thereby allowing freezing damage to occur or risking the safety of personnel to travel to the site to prevent freezing damage.

Based on this information, the winter activities plan for the 2024-2025 Winter season includes the following:

- Operation of the SVE system in the former Public Works Yard area.
- Continued sampling of SVP locations based on subsurface temperatures in accordance with the approved sampling plan.
 - Continued submittals of Monthly Progress Reports to continue sharing of updates and monthly SVP sampling information.
- Full system evaluation by McMillan McGee (subcontractor and owner of the system).
- Full system evaluation by AECOM thermal/remedial system subject matter expert (SME).
- Complete system improvements that are identified during above evaluations.
- Planned SEE system startup in Spring 2025

Based on the above information, it is requested that a winter shutdown of the SEE System be approved.

A copy of this submittal is being sent separately directly to Dana Austin, Gary Ko, Takako Halteman, Amy Butler, and Ali Al-Janabi with the IEPA.

If you have any questions please contact Buddy Bealer, Shell Senior Program Manager, at leroy.bealer@shell.com (484-632-7956), or Wendy Pennington at wendy.pennington@aecom.com (314-452-8929).

Sincerely,

AECOM, on behalf of Shell Oil Products US



Brett Howell, PG
Geologist



Wendy Pennington, PE
Project Manager



Samuel Fisher, CHMM
Environmental Scientist

Enclosures: RCRA Corrective Action Certification Form (original)

cc: Buddy Bealer, Shell
Gary Ko, Dana Austin, Takako Halteman, Amy Butler - IEPA, Springfield
Ali Al-Janabi, IEPA, Collinsville
Ryan Mohr, Fox Smith LLC
Repositories – Roxana Public Library, website
Project File