



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/524-3301

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FEB 18 2025

9589 0710 5270 0389 7037 97

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

Re: 1191150002 -- Madison County  
Equilon Enterprises LLC d/b/a Shell Oil Products US  
ILD080012305  
Log No. B-43R-CA-120  
RCRA Permits - 24A  
Permit CA

Dear Mr. Bealer,

This is in response to a letter submitted by AECOM Technical Services, Inc. (AECOM), on behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell), dated December 13, 2024, and received by the Illinois EPA on December 16, 2024. The subject letter is a request to temporarily shut down the Steam Enhanced Extraction (SEE) system for the 2024-2025 winter season at the Former Public Works Yard (FPWY) located in the Village of Roxana, Illinois. The request was assigned a Log No. B-43R-CA-120.

Some of the soil and groundwater at the Village of Roxana FPWY 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 remediate the release, the SEE system was installed to target volatile organic compounds (VOCs) sorbed to saturated soils, including VOCs as non-aqueous phase liquids (NAPL) and contaminated groundwater. The SEE system became operational on July 17, 2024, and was initially anticipated to operate for six (6) months. However, its operations were interrupted with an equipment failure on October 21, 2024.

In the subject submittal, the facility has expressed mechanical risks and safety concerns if the SEE system were to operate during winter months and proposed that the system be temporarily shut down. The Soil Vapor Extraction (SVE) system in the FPWY is installed and operated to reduce subsurface vapors originating from elevated concentrations of benzene and other VOCs. The SVE system soil and vapor monitoring points (SVP) are both operable during winter months and continue remediation efforts without posing risk to human health and the environment.

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

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

The Illinois EPA has reviewed the subject submittal and hereby approves with the following conditions and modifications:

1. The Illinois EPA can accept the requested temporary seasonal shut down of the SEE system for the 2024-2025 winter season at the FPWY. However, Shell shall submit an estimated start-up date for the SEE system by no later than May 1, 2025, to the Illinois EPA.
2. The monthly monitoring reports for the SEE system following the Corrective Measures Program (CMP) in accordance with Condition 15 of the Illinois EPA letter, dated August 22, 2022 (Log No. B-43R-CA-107), will be granted temporary reprieve until the SEE system resumes operation.
3. Shell must continue to operate the SVE through the winter months, reporting quarterly in accordance with Condition 11 of the Illinois EPA's letter, dated May 28, 2015 (Log No. B-43R-CA-66 and 84). However, the operation of the SVE must include all areas of the Village of Roxana, not necessarily limited to the FPWY, where groundwater or vapor concentrations exceed the residential limits in Table H of Appendix B of Title 35 Illinois Administration Code (Ill. Adm. Code) Part 742.
4. This letter does not approve any modifications to the procedures, frequencies, or locations of sampling, nor does it approve any change to any other monitoring report due dates.
5. Except for as modified by this letter, RCRA corrective action activities carried out at the Equilon facility including off-site activities must meet the requirements of: (1) 35 Ill. Adm. Code 724.201; (2) the facility's RCRA permit; and (3) Illinois EPA letters regarding such activities.

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

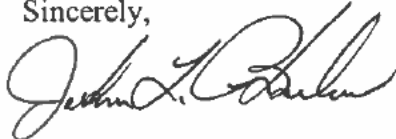
For information regarding the filing of an appeal, please contact:

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

Work required by this letter, 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 for the groundwater aspects of this project, please contact Dana Austin at (217) 785-7427 or [dana.austin@illinois.gov](mailto:dana.austin@illinois.gov). For all other questions, please contact Gary Ko at (217) 557-1434 or [gary.ko@illinois.gov](mailto:gary.ko@illinois.gov).

Sincerely,



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

JLR: GBK: 1191150002-RCRA-B43RCA120-Approval.docx

GBK JDR DANA AMB TNH

Cc: Brett Howell, PG Geologist  
Wendy Pennington, PE Project Manager  
Samuel Fisher, CHMM Environmental Scientist