



February 7, 2011

Mr. Steven F. Nightingale, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794

**Subject: Notification of Free Product Observation
WRB Refining LLC, Wood River Refinery
Roxana, Illinois
119115002 – Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
Log No. B-43-R**

Dear Mr. Nightingale:

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) is submitting this notification in response to Condition 3(c) of the Agency's letter dated May 12, 2009, which requires notification if "... free product is discovered by SOPUS outside of the WRR property boundaries...".

On January 31, 2011, 0.04 feet of light non-aqueous phase liquid (LNAPL) was identified in piezometer ROST-4-PZ. This piezometer is located at the intersection of 3rd Street and Chaeffer Street. The piezometer was gauged again the morning of February 7th and no product was identified. The piezometer was re-gauged in the afternoon of February 7th, as confirmation of the morning result, and the instrument indicated 0.01 feet of product. The LNAPL was gauged via oil-water interface meter. ROST-4-PZ is a ¾ inch diameter piezometer, screened from a depth of approximately 38 to 48 feet below ground. The fluid levels measured are above the top of the screen, approximately 37 feet below ground.

Historically, groundwater analytical data from this area (e.g., GWP-4) did not indicate concentrations that would be indicative of product (e.g., benzene 0.258 mg/L at GWP-4). The product observation may be related to the recent loss of ground water control at the refinery although a definitive cause is unknown at this time. SOPUS intends to continue gauging this piezometer on a weekly basis, concurrent with the gauging being done to assess groundwater control.

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If you have any questions concerning this information or wish to discuss via conference call or meeting, please contact Kevin Dyer, SOPUS Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob_billman@urscorp.com (314/743-4108).

Sincerely,

A handwritten signature in blue ink that reads "Robert B. Billman". The signature is fluid and cursive.

Robert B. Billman
Senior Project Manager

Cc: Kevin Dyer, SOPUS
Amy Boley, IEPA