

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 WRB Refining LP-Wood River Refinery	County Madison
	Street Address 900 South Central Ave.	Site No. (IEPA) 1191150002
	City Roxana, IL 62084	Site No. (USEPA) ILD 080 012 305
2.0	Owner Information	3.0 Operator Information
	Name Not applicable	Name Equilon Enterprises LLC d/b/a SOPUS
	Mail Address	Mail Address 17 Junction Drive, PMB #399
	City	City Glen Carbon
	State Zip Code	State IL Zip Code 62034
	Contact Name	Contact Name Kevin Dyer
	Contact Title	Contact Title Principal Program Manager
	Phone	Phone 618-288-7237
5.0	☐ RFI Phase II Workplan/Report Date of La ☐ CMP Report; Log No. of ☐ Other (describe): Does this submitta ☐ Groundwater Gauging Request ☐ Date of Submittal Jan 23, 2013 ☐ Description of Submittal: (briefly describe what is Updated information related to February 4, 2011 G	init Log No. B-43R ist IEPA Letter on Project Jan 3, 2013 If Last IEPA Letter on Project B-43R-CA-39 al include groundwater information: Yes No s being submitted and its purpose) roundwater Flow Notification and Request to Reduce
	the Frequency of Groundwater Gauging. Letter mo	odified from Nov 8, 2012 version at IEPA's request.
6.0	Documents Submitted (identify all documents in submittal, including cover letter; give dates of all documents)	
	RCRA Cor Action Cert & Itr dated Jan 23, 2013. A	Carlo
	following dates: 2012:1/5,2/7,3/12,4/10,5/7,6/5,7/2,	8/7,9/11,10/10,11/7,12/6; 2013:1/10, 2/12
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.

Date of Submission: Mar 13, 2013

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
- the written authorization is provided with this submittal (a copy of a previously submitted authorization can be used).

	Owner Signature:	Date:	
	Title:		
	Operator Signature: Hum Edgn	Date: D3 /13 /13	
	Title: Principal 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:	Date:	
	Professional's Name		
	Address		
	City		
	State Zip Code		
	Phone		
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		
		Date:	
	Signature of Laboratory Responsible Officer		
	Mailing Address of Laboratory		
	Address		
	City	Name and Title of Laboratory Responsible Officer	
	State Zip Code		



January 23, 2013

BY CERTIFIED MAIL

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:

Update to February 4, 2011 Groundwater Flow Control Notification,

Updated Response to Violation Notice L-2011-01126 & Request to Reduce Groundwater Gauging Frequency

WRB Refining LP, Wood River Refinery

Roxana, Illinois

119115002 - MadisonCounty

Equilon Enterprises LLC d/b/a Shell Oil Products US

Log B-43R

Dear Mr. Nightingale:

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) requests to reduce the frequency of groundwater gauging at the WRB Refining LP Wood River Refinery from weekly to quarterly. On November 8, 2012 URS submitted on behalf of SOPUS an update to SOPUS' February 4, 2011 Groundwater Flow Control Notification letter to the Illinois Environmental Protection Agency (IEPA) and SOPUS' June 10, 2011 Response to Violation Notice L-2011-01126 including a request for reduction of frequency of groundwater gauging. Based on a telephone conversation between Kevin Dyer (SOPUS) and Amy Boley (IEPA) on January 22, 2013, it was requested that Shell revise and resubmit the request regarding groundwater gauging frequency separately, which is hereby provided.

In January 2011, SOPUS began conducting weekly gauging of a subset of the refinery groundwater monitoring wells and selected wells in Roxana in response to learning of temporary reductions in groundwater pumping by the operator of the refinery, WRB Refining LP, an affiliate of Phillips 66 (P66). As reported in a letter to the Illinois Environmental Protection Agency (IEPA) dated February 4, 2011, SOPUS originally believed that "there may have been an instance where control along the west fenceline of the North Property," as required by SOPUS' RCRA permit, may not have been maintained.

Since that time, WRB has conducted maintenance work on several wells and piping and installed new groundwater depression wells. This has resulted in increased pumping rates on a more reliable basis. Additionally, a permit modification was submitted July 29, 2011 to maintain groundwater withdrawal rates at a minimum of 3,000 gallons per minute (gpm) from Main and North Properties. The groundwater contour maps that have been submitted for the Wood River Refinery Corrective Action Program and Roxana Interim Groundwater Monitoring Program (on a semiannual and quarterly basis, respectively) demonstrate capture.

1001 Highland Plaza Drive West, Suite 300 St. Louis, MO 63110

Phone: 314.429.0100 Fax: 314.429.0462



Mr. Steven Nightingale Illinois Environmental Protection Agency January 23, 2013 Page 2

During 2012, SOPUS developed a groundwater flow model to better understand conditions for groundwater capture. The modeling report was submitted to IEPA on July 27, 2012. One conclusion of the model was that the minimum pumping rates to maintain groundwater capture under differing water level conditions are on the order of 2,500-2,700 gpm (specifically 2,523 to 2,668 gpm as predicted by the model). Based on this and our understanding of the WRB pumping rates, groundwater capture would have been maintained during the period when it was suspect (i.e., January 2011).

In light of the modeling results, we reevaluated the actual measured groundwater data by using smaller contour intervals. Contour maps from before (October and November 2010), during (January 2011), and after (February 2011) the suspect period were produced using a contour interval of 0.25 feet. The maps are included in this submittal as **Figures 1** through **4**. These maps indicate that groundwater capture was maintained along the west fenceline of North Property.

Based on the above information, SOPUS believes it is no longer necessary to continue gauging monitoring wells on a weekly basis to assess groundwater capture. SOPUS requests the Agency's concurrence to stop weekly gauging and return to quarterly gauging as required by the RCRA permit. As a separate but related matter, SOPUS will continue to gauge monitoring wells that display separate phase product on a weekly basis.

If you have any questions concerning this request, please contact Kevin Dyer, SOPUS Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob.billman@urs.com (314/743-4108). We look forward to your response.

Sincerely,

Robert B. Billman

Senior Project Manager

Enclosures:

Figure 1 – Groundwater Contour Map, October 2010

Figure 2 – Groundwater Contour Map, November 2010

Figure 3 – Groundwater Contour Map, January 2011

Figure 4 – Groundwater Contour Map, February 2011

cc:

Kevin Dyer, SOPUS

Lebert B Bellman

Amy Boley, Illinois Environmental Protection Agency

Mike Bechtol, Phillips 66



































