

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 LLC - 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

Name: Not Applicable

Mailing
Address: _____

Contact Name: _____

Contact Title: _____

Phone No.: _____

3.0 OPERATOR INFORMATION

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

17 Junction Drive, PMB #399

Glen Carbon, IL 62034

Kevin Dyer

Principal Program Manager

618-288-7237

4.0 TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)

- RFI Phase I Workplan/Report
 RFI Phase II Workplan/Report
 CMP Report; Phase _____

Other (describe):

Additional information

Date of Submittal March 14, 2011

IEPA Permit Log No. B-43-R

Date of Last IEPA Letter

on Project 11/15/10

Log No. of Last IEPA

Letter on Project B-43R-CA-2

Does this submittal include groundwater information: Yes No

5.0 DESCRIPTION OF SUBMITTAL: (briefly describe what is being submitted and its purpose)

Additional information for February 7, 2011 Notification of Free Product; contains scope of work to delineate possible free product near ROST-4-PZ..

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

RCRA Corrective Action Certification and letter dated March 14, 2011.

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.

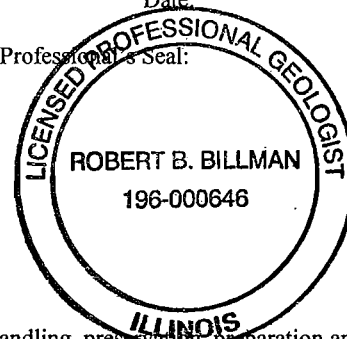
A person is a duly authorized representative only if:

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: *Karin Edger* _____ 3/14/11 _____ (Date)
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.

Professional's Signature: *Robert B. Billman* _____ 3/15/11 _____ (Date)
Professional's Name: Robert B. Billman Professional's Seal:
Professional's Address: URS Corporation
1001 Highlands Plaza Drive West
St. Louis, MO 63110
Professional's Phone No.: 314-743-4108



- 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 _____
Mailing Address of Laboratory _____
Signature of Laboratory Responsible Officer _____ Date _____
Name and Title of Laboratory Responsible Officer _____



March 14, 2011

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

**Subject: Additional Information
February 7, 2011 Notification of Free Product
WRB Refining LLC, Wood River Refinery, Roxana, Illinois
Equilon Enterprises LLC d/b/a Shell Oil Products US
119115002 - Madison County
Log No. B-43-R**

Dear Mr. Nightingale:

INTRODUCTION AND BACKGROUND

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) is providing the enclosed additional information relative to SOPUS' notification of free product to the Agency dated February 7, 2011. This matter was discussed with representatives of Illinois Environmental Protection Agency (IEPA), SOPUS and URS on March 3, 2011 and the general scope of work was discussed.

Piezometer ROST-4-PZ is located at the intersection of 3rd and Chaeffer Streets (**Figure 1**). It is constructed of 3/4-inch diameter PVC and screened from a depth of approximately 38 to 48 feet below ground surface (bgs). It was installed in Summer 2009. It has been gauged periodically since installation, with no indications of free product, until recently. Concurrent with the loss of groundwater gradient control from reduced groundwater pumping by ConocoPhillips, as stated in the February 7, 2011 notification to the IEPA, free product was first observed in ROST 4-PZ on January 31, 2011, when gauged as part of the 1st quarter 2011 groundwater sampling event. Since that time, ROST-4-PZ has been gauged on a weekly basis in conjunction with monitoring other wells for the recapture of the groundwater gradient control, and free product measurements have ranged from 0.04 feet to 0.00 feet. The closest surrounding monitoring locations are ROST-3-PZ (to the west), P-55 (to the north), P-60-11 (to the east), and P-60 (to the south-southeast). Groundwater levels are above the tops of the screens at these locations except for P-60-11 and P-55. Product is not currently present at either of these locations. **Figure 1** includes information on product observations in these wells.

1001 Highland Plaza Drive West, Suite 300
St. Louis, MO 63110
Phone: 314.429.0100
Fax: 314.429.0462



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SCOPE OF WORK

SOPUS proposes the following scope of work to delineate the extent of possible free product in the ROST-4-PZ area.

Six soil borings will be advanced at the locations shown on **Figure 1** using conventional drilling techniques. Two borings will be advanced to the north, west and south of ROST-4-PZ in each direction. The borings will be located approximately 50 feet and 100 feet from ROST-4-PZ. We know from prior work in the area there are several underground utilities beneath Chaeffer and Third Streets. As such, locations will be adjusted as necessary. A private utility locator and the JULIE locating service, along with information from the Village of Roxana, will be used to locate utilities. An air knife will be used at each location prior to advancing the boring.

The borings will extend to a depth of approximately 5 feet into the groundwater table, which is expected to be a total depth of approximately 43 feet bgs (based on 2/28/11 gauging data). The borings will be continuously sampled and logged. Recovered soil samples will be screened via visual observation and headspace screening using an organic vapor meter. Up to three samples will be collected from each soil boring for analysis -one at the top of the sand unit, one in the middle, and one at or near the bottom of the boring. The sample interval showing the highest apparent impact (if any) within each of these zones will be submitted to the laboratory for analysis. The samples submitted to the laboratory will be analyzed for volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) using EPA Methods 8260B and 8270C, respectively. This is consistent with the current analytical protocol for soil and groundwater work in Roxana.

Upon completion, a 2-inch diameter PVC well will be installed in each of the six borings. This size will accommodate potential product recovery techniques (e.g., absorbent socks). The wells will be constructed with 10 foot long well screens. A sand pack will be placed from the bottom of the well to approximately 2 feet above the top of the screen. A minimum 2 foot thick bentonite seal will overlie the sand pack. The remainder of the annulus will be filled with cement bentonite grout, and a flush mount well vault will be placed at the surface.

To accommodate potential product recovery techniques, ROST-4-PZ will be overdrilled and replaced with a 2-inch diameter well, similar in construction to the wells described above.

Drill cuttings and decon fluids will be managed in a similar manner as done with the other work in Roxana.

We reserve the ability to make field adjustments based on conditions encountered.



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Gauging of free product (if any) in these newly constructed wells (in addition to ROST-4-PZ) will be included in the weekly gauging program currently being performed in the area to monitor for groundwater gradient control. If product is identified in any of these wells, suitable product recovery techniques will be used (e.g., absorbent socks or manual product recovery if product thickness is minimal).

We will develop and submit a short report of this work, including a description of the soil boring and well installation process, boring and well construction logs, laboratory analytical results, and gauging information within a reasonable time from completion. If any further product in proximity to ROST 4-PZ is delineated, the appropriate frequency of free product gauging/removal will be determined. In addition, once groundwater gradient control is regained, monitoring activities will be scaled back to the levels as identified in the Part B permit.

SCHEDULE

We will begin the above work upon your approval of this plan. We estimate the time from plan approval to submittal of the report to be approximately eight weeks.

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@urscorp.com (314/743-4108).

Sincerely,

A handwritten signature in blue ink that reads 'Robert B. Billman'.

Robert B. Billman
Senior Project Manager

Attachment – Figure 1

Cc: Kevin Dyer, SOPUS
Amy Boley, IEPA

WOOD RIVER REFINERY

MW-9

SCREENED 398.75-388.75
 WL = 404.68 ON 2/28/11
 NO PRODUCT OBSERVED
 NO OPEN SCREEN SINCE INSTALLATION
 NO PRODUCT SINCE INSTALLED (4Q10)

MW-10

SCREENED 400.60-390.60
 WL = 404.72 ON 2/28/11
 NO PRODUCT OBSERVED
 NO OPEN SCREEN SINCE INSTALLATION
 NO PRODUCT SINCE INSTALLED (4Q10)

SECOND ST

SCREENED 407.45-382.45
 WL = 404.28 ON 2/28/11
 NO PRODUCT OBSERVED
 OPEN SCREEN SINCE 1Q07
 0.02 FT PRODUCT IN 2Q09

SCREENED 413.53-383.53
 WL = 403.82 ON 2/28/11
 NO PRODUCT OBSERVED
 OPEN SCREEN SINCE INSTALLED IN 2Q10
 NO PRODUCT OBSERVED

SCREENED 404.27-394.27
 WL = 404.40 ON 2/28/11
 NO PRODUCT OBSERVED
 OPEN SCREEN THRU 2Q10
 PRODUCT OBSERVED DURING 1Q11

THIRD ST

ROST-3-PZ

SCREENED 402.29-392.29
 WL = 404.07 ON 2/28/11
 NO PRODUCT OBSERVED
 OPEN SCREEN THRU 1Q10
 AND NO PRODUCT THEN

ROST-4-PZ

SCREENED 401.57-381.57
 WL = 403.56 ON 2/28/11
 0.10 FT PRODUCT OBSERVED
 OPEN SCREEN 1Q07-2Q09
 PRODUCT OBSERVED DURING THIS TIME
 (3 TO 9.5 FT)

MW-11

SCREENED 400.67-390.67
 WL = 404.23 ON 2/28/11
 NO PRODUCT OBSERVED
 NO OPEN SCREEN SINCE INSTALLATION
 NO PRODUCT SINCE INSTALLED (4Q10)

SCREENED 402.43-382.43
 WL = 403.53 ON 2/28/11
 0.20 FT PRODUCT OBSERVED
 OPEN SCREEN 3Q09-1Q10
 PRODUCT OBSERVED DURING THIS TIME
 (0.02 TO 0.81 ft)

FOURTH ST

SCREENED 398.54-372.54
 WL = 402.89 ON 2/28/11
 NO PRODUCT OBSERVED
 OPEN SCREEN 1Q07-1Q09
 PRODUCT SPORADICALLY OBSERVED
 (0.01 TO 1.45 FT)

CHAFFER ST

P-55

P-60-11

P-60

P-60-13

T-12

LEGEND

- PROPOSED SOIL BORING/
GROUNDWATER WELL
- ⊕ GROUNDWATER MONITORING
WELL OR PIEZOMETER

NOTES:
 GROUNDWATER
 ELEVATIONS ARE
 RELATIVE TO THE 1988
 USGS DATUM.



SHELL OIL PRODUCTS US
 ROXANA, ILLINOIS

PROJECT NO.
 21562593



DRN. BY:wmp 3/4/11
 DSGN. BY:djd
 CHKD. BY:tja

ROST-4-PZ Area

FIG. NO.
 1