

February 14, 2013

Mr. James K. Moore, P.E. Illinois Environmental Protection Agency Bureau of Land 1021 North Grand Avenue East Springfield, Illinois 62794

Subject: SVE System Construction Completion Report Addendum Equilon Enterprises LLC d/b/a Shell Oil Products US Roxana, Illinois 1191150002 -- Madison County ILD 080 012 305 Log No. B-43R

Dear Mr. Moore:

URS Corporation (URS), on behalf of Shell Oil Products US (SOPUS), is submitting the enclosed SVE System Construction Completion Report Addendum.

If you have any questions concerning this report, please contact Kevin Dyer, SOPUS Principal Program Manager at (618) 288-7237 or <u>kevin.dyer@shell.com</u>, or Bob Mooshegian at (314) 743-4106 or <u>robert.mooshegian@urs.com</u>.

Sincerely,

Dave Palmer Project Manager

2007 Mushy S

Robert E. Mooshegian, CHMM Senior Project Manager

Enclosure

Cc: Kevin Dyer, SOPUS Gina Search, IEPA-Collinsville REPORT

SVE SYSTEM CONSTRUCTION COMPLETION REPORT ADDENDUM

WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS

Prepared for Shell Oil Products US 17 Junction Drive PMB#39 Glen Carbon, IL 62034

February 2013

URS Corporation 1001 Highland Plaza Drive West, Suite 300 St. Louis, MO 63110 (314) 429-0100 **Project # 21562850.12000**

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): <u>1191150002</u>	
	City: Roxana, IL 62084	Site No. (USEPA): <u>ILD 080 012 305</u>	
2.0	OWNER INFORMATION	3.0 OPERATOR INFORMATION	
	Name: Not Applicable	Equilon Enterprises LLC d/b/a Shell Oil Products US	
	Mailing Address:	17 Junction Drive, PMB #399	
		Glen Carbon, IL 62034	
	Contact Name:	Kevin Dyer	
	Contact Title:	Principal Program Manager	
	Phone No.:	618-288-7237	
4.0	TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)		
	RFI Phase I Workplan/Report	IEPA Permit Log No. <u>B-43R</u>	
	RFI Phase II Workplan/Report CMP Report; Phase	Date of Last IEPA Letter on Project <u>September 13, 2012</u>	
	\square Other (describe):	Log No. of Last IEPA	
	SVE System Construction Completion Report Addendum	Letter on Project B-43R-CA-12 and 14	
	Date of Submittal	Does this submittal include groundwater information: Yes X No	
5.0	DESCRIPTION OF SUBMITTAL : (briefly describe wh	nat is being submitted and its purpose)	
	· · · ·	n for a Soil Vapor Extraction System constructed rks Yard.	
6.0	DOCUMENTS SUBMITTED (identify all documents in	submittal, including cover letter; give dates of all documents)	
	Cover letter, RCRA Corrective Action Certi Report Addendum.	fication and SVE System Construction Completion	
7.0	<u>CERTIFICATION STATEMENT</u> - (This statement is p professional and laboratory in Items 7.1, 7.2 and 7.3 belo	art of the overall certification being provided by the owner/operator, w). The activities described in the subject submittals have been carrie	

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.

IEPA RCRA Corrective Action Certification

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

Date	of	Submission:	

Page 2

- **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): 7.1
 - For a Corporation, by a principal executive officer of at least the level of vice-president. 1.
 - 2. For a Partnership or Sole Proprietorship, by a general partner or the proprietor, respectively.
 - For a Governmental Entity, by either a principal executive officer or a ranking elected official. 3.
 - A person is a duly authorized representative only if:
 - the authorization is made in writing by a person described above; and 1.
 - 2. the written authorization is provided with this submittal (a copy of a previously submitted authorization can be used).

Jwner Signature:	(Date)
Derator Signature: Kein Eklopen	2/5/13
Title: Principal Program Manager	(Date)

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:	Nu Dr	2/1/13
Ų	1 Juli B Vess	Date:
Professional's Name:	Corporation Plus	Professional's Seat OFESSION
Professional's Address: _	8 200 College DIVa.	Jest un 12
	Suite Leve	ESLIE B. VOSS
-	Overland Park, KS662	V 0 062.063455 5
Professional's Phone No.:	(913) 344-1040	THOMAS OF ILLINO
LABORATORY CERTI	FICATION (if necessary) - The sample collection	h, handling, preservation, preparation and analysis
	ratory was responsible were carried out in accordan	

7.3 which this laboratory was resp

Name of Laboratory	
	Signature of Laboratory
	Responsible Officer

Mailing Address of Laboratory

Date

Name and Title of Laboratory Responsible Officer

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SECTIONONE

Introduction

At the request of Shell Oil Products US (SOPUS), URS Corporation (URS) designed and constructed a Soil Vapor Extraction (SVE) system (System). The System was constructed along the west boundary (West Fenceline) of the Wood River Refinery (WRR) North Property, in the Village of Roxana, Illinois (Village) and within the Village Public Works (PW) Yard. The West Fenceline portion of the System was installed between March 2011 and January 2012, as presented in the May 2012 *SVE System Construction Completion Report*. At that time, access to Village property, including the PW Yard, had not yet been provided to SOPUS for construction of the PW portion of the System. An access agreement between SOPUS and the Village was subsequently executed on October 5, 2012. The purpose of this Construction Completion Report (CCR) Addendum is to provide information regarding System layout and construction activities for the PW Yard portion of the System. These construction activities were referred to as Phase 6 in the *SVE System Construction Completion Report*.

1.1 SITE BACKGROUND

The WRR is composed of five areas, including the North Property, which contains storage tanks and most of the current and past waste management areas. Located in the Village at 900 South Central Avenue, WRR was operated by Shell Oil Company and subsequent owners until ownership changed to ConocoPhillips (COP) effective June 1, 2000. WRB Refining LLC, formed January 1, 2007, was a 50/50 joint venture between COP and EnCana US Refineries, LLC. On December 31, 2010, WRB Refining LLC was converted into a limited partnership named WRB Refining LP (WRB) with limited partners COP and Cenovus US Refinery Holdings. ConocoPhillips Company announced the separation of their Refining and Marketing business from their Exploration & Production business on July 14, 2011. The separation included an ownership change as well as a name change that became effective May 1, 2012. Phillips 66 (P66) is now the operator of WRR. Equilon Enterprises LLC (d/b/a Shell Oil Products US (SOPUS)) is working with the assistance of P66 on several environmental projects and programs.

Subsurface investigations have been conducted within the area generally bounded by Illinois Route 111 to the west, the West Fenceline to the east, East 1st Street to the north, and Rand Avenue to the south and within the WRR along the West Fenceline (**Figure 1**).

These are the two areas to be addressed by the System, and together will be referred to as the "Site" for the purposes of this document. The primary System construction area is located on the North Property, along the West Fenceline, between Second and Eighth Streets in the Village



SECTIONONE

(Figure 2). The construction area for the PW Yard portion of the System is presented on Figure 2A.

1.2 SOIL VAPOR EXTRACTION

The current understanding of existing site conditions is the result of extensive investigative efforts beginning with the *West Fenceline P-93 Dissolved Phase Benzene Investigation* conducted in 2006. The investigative efforts included collection of soil, groundwater, LNAPL, and soil vapor samples.

To address potential vapor intrusion in the Village, SOPUS submitted a Vapor Intrusion Investigation Work Plan to the Illinois Environmental Protection Agency (IEPA) in September, 2010, in which installation of an SVE system was proposed (SOPUS, 2010). SOPUS then submitted a Pilot Test Work Plan to IEPA in December 2010 to gather additional information required for System design. IEPA formally approved the pilot test on March 16, 2011 (IEPA, 2011); however, based on conversations with the IEPA, pilot test activities moved forward ahead of formal approval and were conducted between February 28, 2011 and March 24, 2011, including advancement of soil borings completed as SVE wells (SVE-1 along the West Fenceline and SVE-2 at the PW Yard). The 2011 IEPA letter, in addition to approving the pilot test work plan, also required submittal of a conceptual/final design report. The June 2011 Conceptual/Final Design Report was submitted to the IEPA presenting background information, remedial objectives (and conceptual approach to meet those objectives), and provided a final Subsequent to the Conceptual/Final Design Report and associated System design. correspondence, IEPA issued a Joint Construction and Operating Permit on July 14, 2011 for construction and operation of the System. SOPUS submitted the SVE System Construction Completion Report for the West Fenceline portion of the System in May 2012.

As stated above, this CCR Addendum describes the construction activities associated with installation of the PW Yard portion of the System.



SECTIONTWO

Technical Specifications

Plans, technical specifications, and drawings used for construction/installation of the System were provided in the June 11, 2011 *Conceptual/Final Design Report*, along with revisions included in a subsequent submittal to IEPA on September 23, 2011.

The PW Yard portion of the System consists of six SVE wells located within the PW Yard (**Figure 2**). SVE well construction details and boring logs were previously provided in the May 2012 *SVE System Construction Completion Report*.

The six SVE wells (SVE-21, SVE-22, SVE-23, SVE-24, SVE-26, and SVE-27) located on the PW property are part of the "teal line" (**Figure 2 and Figure 2A**), interconnected by 4-inch diameter High Density Polyethylene (HDPE) piping. The HDPE piping connects to the previously installed 4-inch steel piping terminated at the West Fenceline of the WRR North Property, adjacent to the PW Yard property. Within the WRR, the PW Yard SVE wells are connected via the 4-inch steel piping to a vapor/liquid separator (VLS) and a rotary lobe positive displacement blower housed within a customized intermodal freight container (conex). Piping from the PW Yard SVE wells feeds into the conex, where vapor moves through the VLS, before traveling through the blower and a baffle connected to a Regenerative Thermal Oxidizer (RTO). A second blower, located on the RTO side of the baffle, pushes the vapor into the RTO and adds fresh air to dilute the vapor stream as necessary.



SECTIONTHREE

Deviations From Conceptual Design

Similar to the West Fenceline portion of the System, the piping within WRR was constructed of carbon steel. However, as the piping on PW property was to be constructed below grade, the "teal line" within the PW Yard was constructed of HDPE piping, rather than carbon steel. To facilitate future location of the subsurface, non-metallic piping, a tracer wire was installed along all HDPE piping from each well vault to a carbon steel connection flange.

There were no other deviations from the *Conceptual/Final Design Report* for installation of the PW Yard portion of the System.



SECTIONFOUR

Description of Construction Activities

Construction of the PW Yard portion of the System consisted of the installation of HDPE piping, galvanized steel vaults with concrete floors, and connection of the six previously installed SVE wells located at the PW Yard property.

Korte and Luitjohan, Inc. (K&L), of Highland, Illinois, was responsible for construction of the PW Yard portion of the System. Construction activities commenced on October 16, 2012, with vacuum excavation of soil in locations of known subsurface utilities on the PW Yard property. At the request of the Village Public Works Department (PWD), sections of 8-inch HDPE piping were installed as a casing for the 4-inch vapor lines at specific utility crossings. The 8-inch piping was sealed at the ends to serve as a protective casing in the event PWD needed to mechanically excavate utilities for repair or replacement (**Appendix A**).

After the utilities were uncovered, a pipe trench was excavated from the carbon steel piping connection flange at the West Fenceline to each of the six SVE wells. Following excavation, HDPE piping and tracer wire were installed, along with galvanized steel well vaults with concrete floors.

The HDPE piping connecting the six SVE wells to the carbon steel piping was bedded with approximately three inches of sand above and below the pipe. The remaining portion of well vault and piping excavations were backfilled with excavated materials. A 6- to 12-inch layer of CA-6 aggregate was placed as the top layer of backfill in roadway areas.

K&L completed construction activities on November 19, 2012 with the successful hydrostatic testing of the HDPE piping that extends from the PW Yard SVE wells to the West Fenceline. Hydrostatic test results can be found in **Appendix B**. Previous hydrostatic testing results for the carbon steel portion of the "teal line" were provided in Appendix E of the *SVE System Construction Completion Report*. URS began commissioning of the PW Yard portion of the System on December 3, 2012, with all PW Yard SVE wells online by December 6, 2012.



SECTIONFIVE

Detailed As-Built Drawing

Plan views of the System are included in **Figures 2** and **2A**. K&L's detailed as-built drawing is included in **Appendix A**.



SECTIONSIX

Quality Assurance/Quality Control

URS personnel provided oversight during the construction and installation of the PW Yard portion of the System to monitor, document, and assure construction activities and performance met the intent of the design specifications. Oversight activities included layout, documentation of installation, and general monitoring of the construction. Additionally, the on-site URS representatives monitored compliance of the contractor with their QA/QC plans.

K&L's QA/QC documentation / SVE piping hydrostatic testing results are presented in Appendix B.



SECTIONSEVEN

Conclusions

Daily on-site construction monitoring was performed by URS field representatives and with K&L's on-site QA/QC representatives. Coupled with this monitoring and review of the project QA/QC documentation and data, URS observed that the construction and installation activities performed by URS' contractors for the PW Yard portion of the System were in general conformance with the design requirements described in the *Conceptual/Final Design Report*.

Photographs of construction activities are included in Appendix C.



SECTIONEIGHT

- Illinois Environmental Protection Agency (IEPA). November 15, 2010. Letter of work plan approval with conditions.
- Illinois Environmental Protection Agency (IEPA). July 14, 2011. Joint Construction and Operating Permit
- Shell Oil Products US. September 2007. West Fenceline P-93 Dissolved Phase Benzene Investigation. Prepared by URS Corporation.
- Shell Oil Products US. September 20, 2010. *Vapor Intrusion Investigation Work Plan.* Prepared by URS Corporation.
- Shell Oil Products US. June 2011. *Conceptual/Final Design Report*. Prepared by URS Corporation.
- Shell Oil Products US. May 2012. *SVE System Construction Completion Report*. Prepared by URS Corporation.
- URS Corporation. September 23, 2011 electronic mail to IEPA in response to September 1, 2011 request for additional information.











APPENDIXA





13	1995.72331	432.65838	wye pipe
8	2018.11651	433.864	45° bend
1	2017.93817	434.44315	casing
73	2017.79724	436.82238	casing
)2	2017.91305	434.4761	22* bend
52	2017.802	436.85277	22" bend
5	2014.85323	436.69822	pipe elevation at vault 22
54	1995.74085	432.727	45° bend
68	1975.29109	432.10391	pipe elevation
8	1955.99971	431.5843	45° bend
92	1941.01683	431.28617	casing
99	1931.17529	430.94787	casing
81	1902.09948	429.82912	pipe elevation
2	1848.87006	428.07738	pipe elevation at vault 23
11	2014.35706	439.10043	22 vault lid
of	vault 2026	.458 184	45.32 430.8
)30	.669 1968	.364 43	4.648
958	.356 1992	.893 43	4.733
906	.15 2052	.262 43	5.535



SHEET NO.

PIPE-

KORTE &

APPENDIXB

Contractor QA/QC Documentation and Test Results



Pressure Test Record Form



Pressure test plan number: SVE System Piping	Project number: 1208	Pressure system ID: Roxana Public Works			
Test Parameters: 75 psi for 60 min with 5% allowable variation in preassure					
Type of test:	Hydrostatic X	pneumatic			
Test Date: 11/19/12	Test Start Time: 0800	Test End Time:1154			
Test Duration: 3 Hours 54 Min.		Actual Holding Time: 71 min			
Preasure Test Results:	Meets Requirements X	Doesn't Meet Requirements			
Visual Inspection Results:	Meets Requirements X	Doesn't Meet Requirements			

Action	Time Conducted	Personnel Involved	
Filled Line With Potable Water	800	Keith Albers	
Preasureized Line reading	815	Keith Albers	
Adjustd to 75 PSI	820	Keith Albers	
Preasureized Line to 80 PSI from 65	825	Keith Albers	
Preasureized Line to 80 PSI from60	834	Keith Albers	
Preasureized Line to 80 PSI from 50	903	Keith Albers	
Preasureized Line to 80 PSI from70	908	Keith Albers	
Preasureized Line to 80 PSI from 75	917	Keith Albers	
Adjusted Line to 75 PSI	1039	Keith Albers	
Line pressure stabilized at 75 PSI	1045	Keith Albers	
Test ended at 75 PSI	1154	Keith Albers	

Remarks: During pressure testing Keith Walked the lines and checked the welds for leaks, No leaks were detected. Ending Pressure was with in Spec'd Tolerances.

Testing Technicians: KEITHAUSERS	Signature: Karde Ales	Date: 12/11/12
Witnessing Inspector: RAY Scherzfert	Signature: Qu Withen	Date: 12/11/12
	0	/ / /

APPENDIXC

Construction Photographs





PHOTOGRAPHIC LOG

Client Name:

Shell

Photo No.Date110/19/12Description:Standing at WRR fenceline looking southwestat the SVE pipe trenchexcavation.

Site Location:

Shell SVE System- Public Works Property

Project No. 21562850.12000



Photo No.Date210/24/12Description:Looking southwest atinstallation of the 4"diameter HDPE SVEpipe placed within a 8"diameter HDPEprotective casing pipein the location ofunderground utilities.





Date

PHOTOGRAPHIC LOG

Client Name:

Shell

Photo No. 3

3 10/25/12 Description: Looking southwest at installation of the 4" diameter HDPE SVE pipe placed within a 8" diameter HDPE protective casing pipe in the location of underground utilities. Protective pipe casings were painted orange and tracer wire was installed the full length of the SVE piping.



Photo No.Date410/25/12Description:At the WRR fence linelooking northeast at theconnection location ofthe 4" diameter HDPESVE pipe from thePublic Works Propertyto the 4" diametercarbon steel SVE pipeentering the WRR.





Photo No.Date610/26/12Description:Facing northeast,looking at theexcavation andinstallation of the SVEpiping to the vault forSVE-27.





PHOTOGRAPHIC LOG

Client Name:

Shell

Photo No.	Date
7	10/31/12
Description:	
Facing east,	looking at
the excavation	on and
installation of	the SVE

piping to the south of the vault for SVE-27.



Shell SVE System- Public Works Property

Project No. 21562850.12000



Photo No. Date 10/31/12 8 **Description:** Facing northeast, looking at the excavation and installation of the SVE piping to the south of the vault for SVE-27.





1		
Photo No. 10	Date 11/1/12	
10 Description: Facing east, the excavation installation of piping to the of the vault for	looking at on and the SVE southwest	





Photo No.Date1211/5/12Description:Facing west, looking atthe excavation andinstallation of the SVEpiping to SVE-26 andSVE-24.





PHOTOGRAPHIC LOG

Client Name:

Shell

Photo No.
13Date
11/9/12Description:
Looking north at the
installation of the 4"
diameter HDPE SVE
pipe and an 8" diameter
HDPE protective pipe
casing placed below an
electrical conduit
servicing the Public
Works equipment fuel
tank.

Site Location:

Shell SVE System- Public Works Property

Project No. 21562850.12000



Photo No.
14Date
11/9/12Description:
Installation of the
precast concrete pad
for the vault for SVE 22.
Facing north.





Photo No.Date1611/6/12Description:Installation of vault for
SVE-26. Facing
northeast.





Photo No. 18	Date 11/9/12	
Description: Trench backfill from vault at SVE-24 west to vault at SVE-26.		





	i	
Photo No.	Date	
20	11/14/12	/
Description		
Grading and		
resurfacing th	ne Public	
Works roadw	•	
the southwes		
gate eastwar		al.
back gate. F	acing east.	
		1
		AND N
		Children of
		1 BILL
		AL SO
		A PARTY
		AL AL





Photo No. 22	Date 11/14/12	
Description: Pipe trench e from vault at vault at SVE- Facing west.	excavation SVE-22 to	





Photo No.Date2411/14/12Description:Fabrication andinstallation of the 4"diameter HDPE SVEpipeline from vault atSVE-22 to vault atSVE-23. Facingsoutheast.





PHOTOGRAPHIC LOG



Photo No.Date2611/16/12Description:Grading and resurfacing the PublicWorks roadway from the northwest entrance gate eastward along the north side of the Public Works buildings. Facing west.Facing west.		1	
Description: Grading and resurfacing the Public Works roadway from the northwest entrance gate eastward along the north side of the Public Works buildings.	Photo No.	Date	
Grading and resurfacing the Public Works roadway from the northwest entrance gate eastward along the north side of the Public Works buildings.	26	11/16/12	
resurfacing the Public Works roadway from the northwest entrance gate eastward along the north side of the Public Works buildings.		:	
Works roadway from the northwest entrance gate eastward along the north side of the Public Works buildings.			
the northwest entrance gate eastward along the north side of the Public Works buildings.			
gate eastward along the north side of the Public Works buildings.	-		
the north side of the Public Works buildings.			
Public Works buildings.	5 5		
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PHOTOGRAPHIC LOG



