



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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URS CORPORATION

DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

April 21, 2009

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RECEIVED

Certified Mail
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Shell Oil Products US
Attn: Kevin Dyer, Staff Project Manager
17 Junction Drive
PMB #399
Glen Carbon, Illinois 62034

WRB Refining LLC Wood River Refinery
Attn: David Dunn
900 South Central Avenue
P.O. Box 76
Roxana, Illinois 62084

Re: 1191150002 -- Madison County
Equilon Enterprises LLC
ILD2018000002
Log No. B-43-CA-13
Received: April 1, 2009
Permit CA
RCRA Permits

Dear Mr. Dyer and Mr. Dunn:

This is in response to the document prepared by URS on behalf of Shell Oil Products US (SOPUS) requesting the ability to optimize the product recovery system in well P-60 at the Wood River Refinery (WRR).

The issuance of this letter will not: (1) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or 35 Ill. Adm. Code 620 regulations as set forth in Violation Notice L-2008-01134; or (2) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the afore-mentioned possible violations.

A review has been conducted in regards to the, "Request to Adjust Product Recovery System - Well P-60," dated March 27, 2009. The subject document is approved with the following conditions and modifications:

- 1. The facility remains subject to the conditions and modifications of the November 25, 2008 Illinois EPA letter (Log No. B-43-CA-10), with the exception of Condition 2.g. Condition 2.g of the November 25, 2008 letter is superseded by Condition 2 below.
2. The Illinois EPA concurs that free product removal via the pump installed at well P-60 is serving as an interim measure at this time, and the following conditions and modifications apply:
a. The pump at well P-60 must be maintained until such time that a permanent product recovery system(s) is installed at the site, or the Illinois EPA determines product removal is no longer necessary.

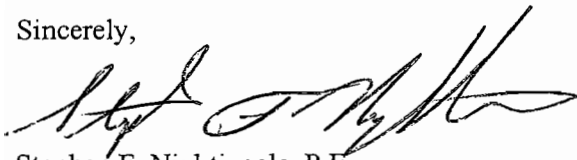
- b. Pursuant to 35 Ill. Adm. Code 724.201(c), SOPUS is not relieved of addressing potentially impacted groundwater conditions beyond the facility boundary, subsequent to any investigation of the WRR property. If needed, the facility must implement corrective action beyond the facility property boundary, where necessary to protect human health and the environment and will not be relieved of responsibility to cleanup a release that has migrated beyond the facility boundary where off-site access is denied.
- c. If free product is discovered by SOPUS outside of the WRR property boundaries, a remediation method must be proposed within thirty (30) days to promptly remove any potential threat to human health and the environment.

This letter shall constitute Illinois EPA's final decision on the subject submittal. Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

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.

Should you have any questions concerning groundwater-related aspects of this letter, please contact Amy Boley at 217/558-4716. Questions about any other aspects of this letter should be directed to RCRA Corrective Action Unit Manager Jim Moore, P.E. at 217/524-3295.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

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AMB DBM JCM

cc: Bob Billman, URS Corporation
Eric Petersen, ConocoPhillips