

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829 BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

217/524-3300

May 22, 2015

Shell Oil Products US Attn: Mr. Kevin Dyer 17 Junction Drive P. O. Box 76 PMB #399 Glen Carbon, Illinois 62034

1191150002—Madison County Equilon Enterprises ILD080012305 Log No. B-43R-CA-37 and 58 **RCRA** Permit Permit CA

Dear Mr. Dyer and Mr. Wolf:

CERTIFIED MAIL 7012 0470 0001 2976 7531 7012 0470 0001 2976 7548

WRB Refining LP Attn: Mr. Brian Wolf 900 South Central Avenue Roxana, Illinois 62084



Equilon Enterprises has been carrying out post-closure care of a surface impoundment closed as a landfill and conducting corrective action on the solid waste management units of concern at the WRB Refining LP Wood River Refinery located in Roxana, Illinois in accordance with a RCRA permit (Log No. B-43R and associated modifications). Among other things, Equilon is addressing contamination along a portion of the western property boundary of the North Property of the refinery as part of its RCRA corrective action program; this contamination extends in certain portions of the Village of Roxana.

Equilon is addressing the contamination mentioned above via a soil vapor extraction (SVE) system and a groundwater corrective action program, these activities are being carried out in accordance with plans and procedures approved by Illinois EPA. A key component of the operation of the SVE is the collection of soil vapor samples from monitoring points to determine the effectiveness of the SVE program. Likewise, a key component of the groundwater corrective action program is the collection of groundwater samples from monitoring wells to determine the effectiveness of the groundwater corrective action program.

This letter acknowledges receipt of and approves an April 3, 2013 submittal made on behalf of Equilon Enterprises LLC and WRB Refining LP by Robert Billman, URS Corporation. This submittal included a report documenting installation of the following vapor monitoring points and groundwater monitoring wells:

- Vapor monitoring points VMP-47 through VMP-53; 1.
- Groundwater monitoring wells MW-16 through MW-22;

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- 3. Groundwater monitoring well P-55R which was installed as a replacement for monitoring well P-55; and
- 4. Groundwater monitoring well ROST-3-MW which was installed as a replacement for monitoring well ROST-3-PZ.

These vapor monitoring points and groundwater monitoring wells were installed in accordance with Illinois EPA's letters dated September 13, 2012 and March 14, 2014, respectively. As indicated in the subject report, they were integrated into the appropriate monitoring programs. Specifically, the additional vapor monitoring points were incorporated into the soil vapor monitoring program approved by Illinois EPA on September 13, 2012 while the additional groundwater monitoring wells were incorporated into the Interim Groundwater Monitoring Program approved by Illinois EPA on March 14, 2012.

In addition to implementing the approved monitoring programs mentioned above, the overall RCRA corrective action activities being out at the subject RCRA permitted facility must meet the requirements of: (1) the facility's RCRA permit; (2) 35 Ill. Admin. Code 620, 724 and 742; and Illinois EPA letters regarding such activities.

Work required by this letter, the submittal mentioned above 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. 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.

If you have any questions regarding the groundwater aspects of this letter, please contact Amy Boley at 217/558-4716. Questions regarding other aspects of this letter should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,

Steven F. Nightingale, P.E. Manager, Permit Section

Bureau of Land

SFN:WTS:1191150002-RCRA-B-43R-CA-37