



January 14, 2014

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: Perched Groundwater Monitoring Request for Abandonment  
Roxana, Illinois  
119115002 – Madison County  
Equilon Enterprises LLC d/b/a Shell Oil Products US  
Log No. B-43R-CA-67**

Dear Mr. Nightingale:

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) is requesting approval to abandon perched groundwater monitoring piezometers ROST-5-PZ and ROST-10-PZ, as described in this letter.

Condition 8.a. of the March 14, 2012 IEPA letter (CA-25) stated that “the facility must include ROST-5-PZ and ROST-10-PZ within the program for at least one year before the determination is made that these wells are dry.”

- Groundwater gauging at ROST-5-PZ and ROST-10-PZ began during 4th Quarter 2010. Groundwater has not been encountered at ROST-5-PZ since 4Q10, with the exception of 3<sup>rd</sup> Quarter 2013 (3Q13) when only 0.22 feet of groundwater was observed.
- Groundwater has not been encountered at ROST-10-PZ since 4Q10, with the exception of 3<sup>rd</sup> Quarter 2011 (3Q11) when only 0.33 feet of groundwater was observed. **Table 1** provides the gauging history for piezometers ROST-5-PZ and ROST-10-PZ.

Based on Condition 8.a. of the March 14, 2012 letter, it has been determined that piezometers ROST-5-PZ and ROST-10-PZ are dry. We request approval to remove these piezometers from the Roxana Interim Groundwater Monitoring Program and to abandon them.

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



Mr. Stephen Nightingale  
Illinois Environmental Protection Agency  
January 14, 2014  
Page 2

If you have any questions, please contact Kevin Dyer, SOPUS Senior Principal Program Manager, at [kevin.dyer@shell.com](mailto:kevin.dyer@shell.com) (618/288-7237), or Bob Billman at [bob.billman@urs.com](mailto:bob.billman@urs.com) (314/743-4108).

Sincerely,

URS Corporation, on behalf of Shell Oil Products US

Wendy Pennington  
Staff Environmental Engineer

Robert B. Billman  
Senior Project Manager

Enclosures: RCRA Corrective Action Certification Form  
**Table 1** Perched Groundwater Gauging History (ROST-5-PZ and ROST-10-PZ)

Cc: Kevin Dyer, SOPUS  
Eric Petersen, Phillips 66  
Shannon Haney, Greensfelder Hemker  
Repositories (Village Hall, Roxana Public Library, Roxana website)



# 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 Equilon Enterprises LLC dba Shell Oil Products US 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  
 Mail Address \_\_\_\_\_  
 City \_\_\_\_\_  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 Contact Name \_\_\_\_\_  
 Contact Title \_\_\_\_\_  
 Phone \_\_\_\_\_

### 3.0 Operator Information

Name Equilon Enterprises LLC dba SOPUS  
 Mail Address 17 Junction Drive, PMB #399  
 City Glen Carbon  
 State IL Zip Code 62034  
 Contact Name Kevin Dyer  
 Contact Title Sr. Principal Program Manager  
 Phone 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. B-43R  
 RFI Phase II Workplan/Report Date of Last IEPA Letter on Project March 14, 2012  
 CMP Report; Log No. of Last IEPA Letter on Project B-34R-CA-25, CA-67  
 Other (describe): \_\_\_\_\_ Does this submittal include groundwater information:  Yes  No  
Removal request for perched GW piezometers  
 Date of Submittal Jan 14, 2014

### 5.0 Description of Submittal: (briefly describe what is being submitted and its purpose)

Request to remove two perched groundwater piezometers based on Condition 8.a. of the IEPA March 14, 2012 letter

### 6.0 Documents Submitted (identify all documents in submittal, including cover letter; give dates of all documents)

RCRA Corrective Action Certification form, Perched Groundwater Monitoring Request for Abandonment letter, Table 1 Perched Groundwater Gauging History (ROST-5-PZ and ROST-10-PZ)

### 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.

For: Equilon Enterprises LLC dbaSOPUS

Date of Submission: 1/14/14

**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: [Signature]  
Title: Principal Program Manager

Date: 01/10/14

**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: [Signature]

Date: 1/14/14

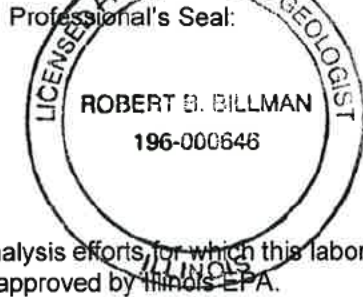
Professional's Name Robert B. Billman

Address 1001 Highland Plaza Drive West

City St Louis

State Mo Zip Code 63110

Phone 314-429-0100



**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 \_\_\_\_\_

State \_\_\_\_\_ Zip Code \_\_\_\_\_

\_\_\_\_\_  
Name and Title of Laboratory Responsible Officer

**TABLE 1  
PERCHED GROUNDWATER GAUGING HISTORY (ROST-5-PZ and ROST-10-PZ)**

WELL ID	TOP OF CASING (elev. <sup>1</sup> )	DATE GAUGED	DEPTH TO PRODUCT (ft btoc)	DEPTH TO WATER (ft btoc)	WATER-PRODUCT INTERFACE (elev. <sup>1</sup> )	Water Thickness (ft)	PRODUCT (elev. <sup>1</sup> )	PRODUCT THICKNESS (ft)	CORRECTED WATER LEVEL <sup>2</sup> (elev. <sup>1</sup> )	SCREENED INTERVAL (elev. <sup>1</sup> ) (ft btoc)	COMMENTS
<b>ROST-5-PZ (Located in the Village Roxana)</b>											
4Q10	442 22	11/12/2010	NE	NE	NA	NA	NA	NA	NA	429 02 - 419 02 (13 20 - 23 20)	Well Dry
1Q11	442 22	1/13/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q11	442 22	4/25/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q11	442 22	7/5/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
4Q11	442 22	10/5/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
1Q12	442 22	1/3/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q12	442 22	4/2/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q12	442 22	7/2/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
4Q12	442 22	10/1/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
1Q13	442 22	1/2/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q13	442 22	4/1/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q13	442 22	7/1/2013	NE	22 98	NA	0 22	NA	NA	419 24		
4Q13	442 22	10/1/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
<b>ROST-10-PZ (Located in the Village Roxana)</b>											
4Q10	444 51	11/12/2010	NE	NE	NA	NA	NA	NA	NA	434 51 - 424 51 (10 00 - 20 00)	Well Dry
1Q11	444 51	1/13/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q11	444 51	4/25/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q11	444 51	7/5/2011	NE	19 67	NA	0 33	NA	NA	424 84		
4Q11	444 51	10/5/2011	NE	NE	NA	NA	NA	NA	NA		Well Dry
1Q12	444 51	1/3/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q12	444 51	4/2/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q12	444 51	7/2/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
4Q12	444 51	10/1/2012	NE	NE	NA	NA	NA	NA	NA		Well Dry
1Q13	444 51	1/3/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
2Q13	444 51	4/1/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
3Q13	444 51	7/1/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry
4Q13	444 51	10/1/2013	NE	NE	NA	NA	NA	NA	NA		Well Dry

**NOTES:**

- 1) Elevations presented in this table are relative to the 1988 USGS datum
- 2) The Corrected W L Elevations presented in this table were corrected by a specific gravity of 0 80 for the wells in which LNAPL was identified
- 3) NA = Not Applicable; NE = Not Encountered; NM = Not Measured