



November 2, 2010

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

**Subject: Request for Schedule Extension
Equilon Enterprises
Roxana, Illinois
1191150002 -- Madison County
ILD080012305
Log No. B-43-CA-16; B-43-CA-18**

Dear Jim:

URS Corporation (URS), on behalf of Shell Oil Products US (SOPUS), requests an extension in time to respond to conditions 5, 15, 16 and 17 as identified in the letter from IEPA to SOPUS dated August 5, 2010.

Condition 5 requests additional information with respect to pipelines along the west fenceline. We have discussed this request with ConocoPhillips and the main source of relevant information is tank records. ConocoPhillips is currently retrieving this information for SOPUS' review. We request the schedule for this information be extended to November 19, 2010.

Condition 15 requests development of a Conceptual Design Report to propose more aggressive measures to address hydrocarbons along the west fenceline. SOPUS is currently working to design a soil vapor extraction (SVE) system as a supplement to the existing hydraulic controls provided by the groundwater depression system. Additionally, the Agency has requested a pilot test and Basis for Design report as part of this process. We request a meeting with the Agency to discuss our approach and preliminary plans, and potential ways to streamline the process in order to expedite installation of the system. The schedule for this work cannot yet be fully defined, so at this time we request an additional 6 months for this work (May 3, 2011), pending this discussion.

Condition 16 requests development of a Construction Completion Report (CCR) to provide the details of the product recovery systems at wells P-60 and P-60-11 and the WRR production wells. We are developing separate CCRs for the P-60 and WRR systems:

- We are currently compiling available information on the P-60 system and will submit this information by November 19, 2010.
- We have communicated with ConocoPhillips on the WRR system. This is a complicated system which has been operating for several decades. As such, developing the CCR is a significant undertaking. We request an additional 6 months for this work (May 3, 2011).

Condition 17 requests information on the maintenance needs and processes for the WRR



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groundwater production wells as part of the CCR. As such, the schedule for this condition follows that of condition 16.

If you have any questions concerning this request, please contact Kevin Dyer, SOPUS project manager at (618) 288-7237 or Kevin.dyer@shell.com or me at (314) 743-4108 or bob_billman@urscorp.com.

Sincerely,

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

Robert B. Billman
Senior Project Manager

cc: Kevin Dyer, SOPUS
Lance Tolson, Shell Oil Company
Amy Boley, IEPA Springfield
Chris Cahnovsky, IEPA Collinsville