

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): 1191150002
City: Roxana, IL 62084 Site No. (USEPA): ILD 080 012 305

2.0 OWNER INFORMATION

Name: Not Applicable

Mailing Address: _____

Contact Name: _____

Contact Title: _____

Phone No.: _____

3.0 OPERATOR INFORMATION

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

17 Junction Drive, PMB #399

Glen Carbon, IL 62034

Kevin Dyer

Principal Program Manager

618-288-7237

4.0 TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)

- RFI Phase I Workplan/Report
 RFI Phase II Workplan/Report
 CMP Report; Phase _____
 Other (describe):

Request to reduce gauging frequency
Date of Submittal February 6, 2012

IEPA Permit Log No. B-43R

Date of Last IEPA Letter
on Project 8/31/11

Log No. of Last IEPA
Letter on Project B-43R-CA-21

Does this submittal include groundwater information: Yes No

5.0 DESCRIPTION OF SUBMITTAL: (briefly describe what is being submitted and its purpose)

Request to reduce frequency of groundwater gauging and supporting information

6.0 DOCUMENTS SUBMITTED (identify all documents in submittal, including cover letter; give dates of all documents)

RCRA Corrective Action Certification and "Status Update for Groundwater Pumping System and Request to Reduce Frequency of Gauging" dated February 6, 2012.

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.

IEPA RCRA Corrective Action Certification

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

Date of Submission: 2/6/12

Page 2

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] _____ 1/26/12 (Date) _____

Title: Principal Program Manager

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: _____ Date: _____

Professional's Name: _____

Professional's Seal:

Professional's Address: _____

Professional's Phone No.: _____

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 _____

Signature of Laboratory Responsible Officer _____ Date _____

Mailing Address of Laboratory _____

Name and Title of Laboratory Responsible Officer _____



February 6, 2012

Ms. Amy Boley
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794

**Subject: Status Update for Groundwater Pumping System and
Request to Reduce Frequency of Gauging**
WRB Refining LP Wood River Refinery
Roxana, Illinois
119115002 – Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
Log No. B-43-R

Dear Ms. Boley:

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) is submitting this update regarding the groundwater pumping system at the Wood River Refinery (WRR), operated by ConocoPhillips (COP). Condition IV (A) (1) of SOPUS' RCRA Part B Permit requires "...control of horizontal and vertical groundwater flow in the uppermost aquifer such that the groundwater flow is towards the interior of the facility along the combined boundaries of North and Main Properties." Control is provided by a variable number of groundwater pumping wells on Main and North properties.

As first reported in January 2011, at specified times previously, groundwater does not appear to have been fully controlled along portions of the western boundaries of the North and Main properties. This appeared to be primarily related to insufficient pumping from the production wells in the interior of the facility.

To help increase interior pumping, COP installed Well 86 (a replacement for Well 82), which was completed and placed in service the week of July 18, 2011. In addition, COP has been performing repair/maintenance activities to further increase overall pumping capacity, including wellhead and valve repairs, pump/motor replacement, etc., as outlined in SOPUS' 2011 *Corrective Action Program Effectiveness Report* (submitted July 15, 2011). On July 29, 2011, SOPUS submitted a permit modification to reinstate a minimum pumping rate of 3,000 gallons per minute (gpm) from the Main and North properties. SOPUS will continue to evaluate performance of the entire groundwater system, in conjunction with COP.

The attached figures are groundwater contour maps that depict conditions monthly, between July and December 2011. The first map, July 18, 2011, shows conditions prior to W-86 coming fully online. This map shows the most significant pumping occurring near the west fenceline. Subsequent maps show conditions with W-86 operating. These maps show that the increased

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



Ms. Amy Boley
Illinois Environmental Protection Agency
February 6, 2012
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pumping and related operational efforts have improved groundwater control, and the interior cone of depression has expanded. As a result, pumping rates in the west fenceline wells have been reduced.

With well W-86 being operational for several months now, and the resulting groundwater flow patterns relatively consistent, we request your approval to decrease the gauging frequency from weekly to quarterly, consistent with the gauging requirements in the Part B permit.

We appreciate your review of this request. If you have any questions, please contact Kevin Dyer, SOPUS Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob.billman@urs.com (314/743-4108).

Sincerely,

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

Robert B. Billman
Senior Project Manager

Attachments:

Groundwater Contour Maps (July 18, July 25, August 22, September 26, October 27,
November 21, and December 28, 2011)

Cc: Kevin Dyer, SOPUS
Gina Search, IEPA
Eric Petersen, COP

NOTES:

1) CONTOUR LINES PRIMARILY GENERATED BY SURFER VERSION 8 MODELING OF GROUNDWATER ELEVATIONS. SOME INTERPRETATION WAS DONE UTILITZING PROFESSIONAL JUDGMENT AND CONTOUR LINES WERE MODIFIED BY HAND.

2) ELEVATIONS ARE RELATIVE TO 1988 USGS DATUM.

3) WELL W-86 NOT FULLY OPERATIONAL.

File: P:\ENVIRONMENTAL\SHELL_OIL_PRODUCT_USA-WRR-COP-WRR_WEEKLY_WELL_GAUGING\FIGURES\2H11\ROXANA_2H11_CONTOUR_MAP (CONTOURS ON 7-18-11).DWG Last edited: JAN. 05. 12 @ 5:41 p.m. by: doud_douglas

BP PROPERTY

VILLAGE OF ROXANA

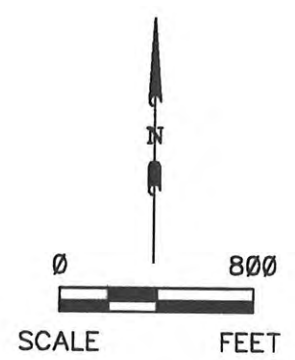
WEST PROPERTY

VALERO PROPERTY

NORTH PROPERTY

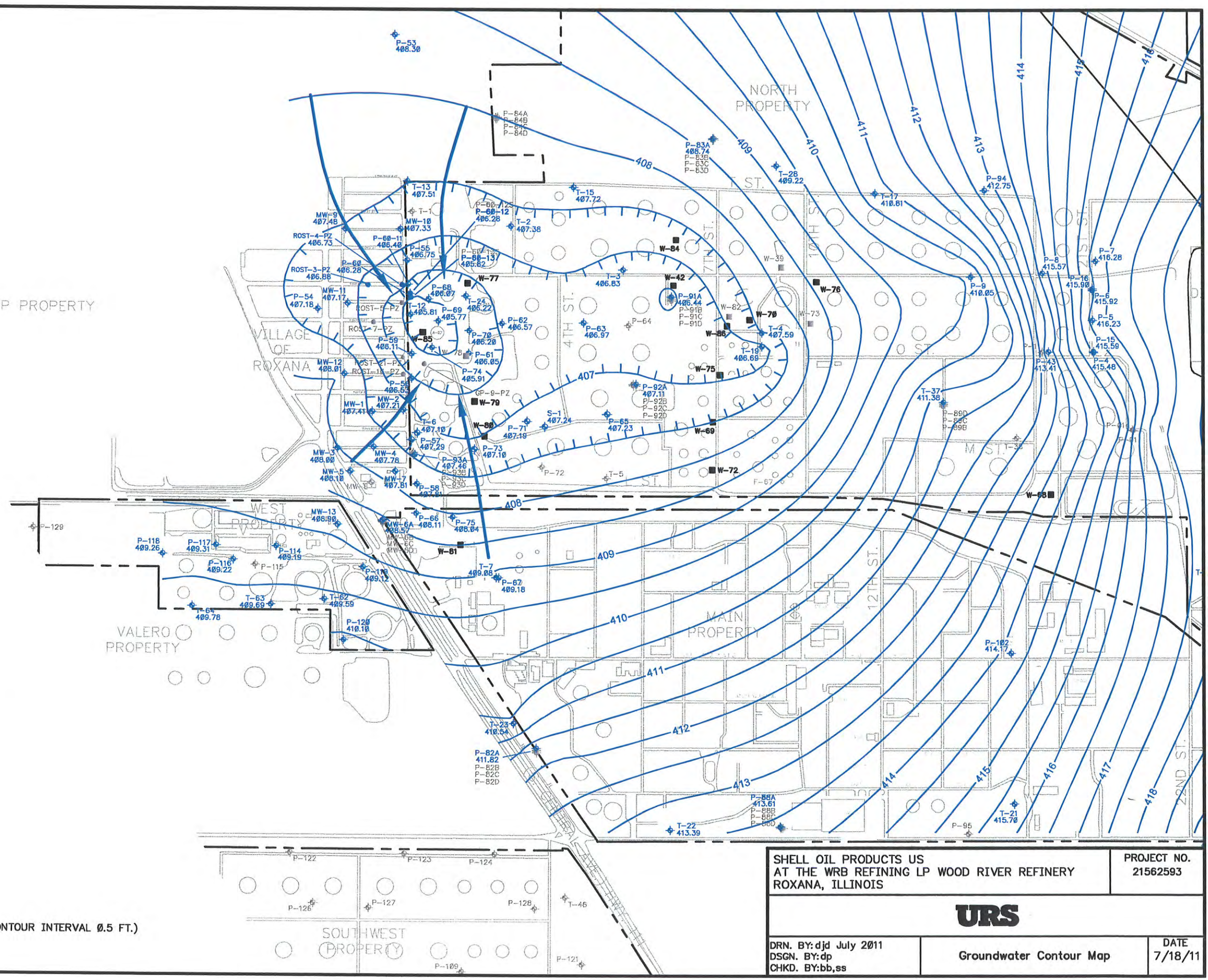
MAIN PROPERTY

SOUTHWEST PROPERTY



LEGEND

- MONITORING WELL LOCATION GAUGED
- PIEZOMETER LOCATION GAUGED
- WATER WELLS (OPERATING)
- GROUNDWATER GRADIENT
- 407 — GROUNDWATER SURFACE CONTOUR NGVD (CONTOUR INTERVAL 0.5 FT.)



SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
URS		
DRN. BY: djd July 2011 DSGN. BY: dp CHKD. BY: bb, ss	Groundwater Contour Map	
	DATE 7/18/11	

NOTES:

- 1) CONTOUR LINES PRIMARILY GENERATED BY SURFER VERSION 8 MODELING OF GROUNDWATER ELEVATIONS. SOME INTERPRETATION WAS DONE UTILITZING PROFESSIONAL JUDGMENT AND CONTOUR LINES WERE MODIFIED BY HAND.
- 2) ELEVATIONS ARE RELATIVE TO 1988 USGS DATUM.
- 3) WELL W-86 BECAME OPERATIONAL THE WEEK JULY 18, 2011.

File: P:\ENVIRONMENTAL\SHELL OIL PRODUCT USG-WRR-COP-WRB WEEKLY WELL GAUGING\FIGURES\2H11\ROXANNA 2H11 CONTOUR MAP (CONTOURS ON 7-25-11).DWG Last edited: JAN_05_12 @ 5:42 p.m. by: david_dequire

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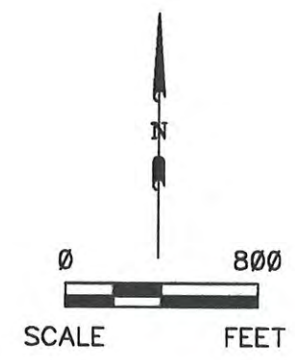
NORTH PROPERTY

WEST PROPERTY

VALERO PROPERTY

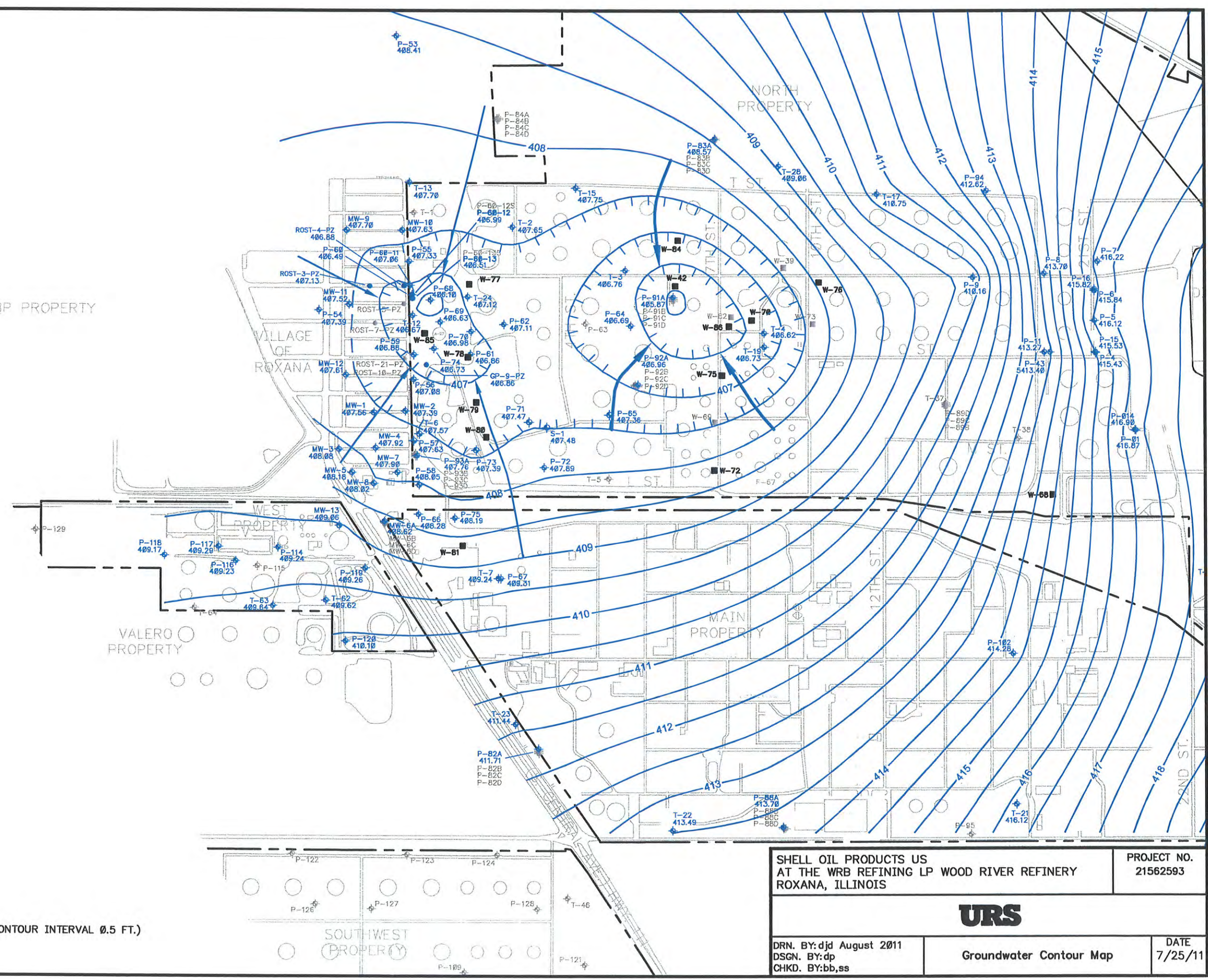
MAIN PROPERTY

SOUTHWEST PROPERTY



LEGEND

- MONITORING WELL LOCATION GAUGED
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SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
DRN. BY: djd August 2011 DSGN. BY: dp CHKD. BY: bb, ss	Groundwater Contour Map	DATE 7/25/11

- NOTES:
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 - 2) ELEVATIONS ARE RELATIVE TO 1988 USGS DATUM.

FILE: P:\ENVIRONMENTAL\SHELL_OIL_PRODUCT_USAC-WRR-COP-WRR_WEEKLY_WELL_GAUGING\FIGURES\2H11\ROXANNA_2H11_CONTOUR_MAP (CONTOURS ON 8-22-11).DWG Last edited: JAN. 05. 12 @ 5:38 p.m. by: david_denure

BP PROPERTY

VILLAGE OF ROXANA

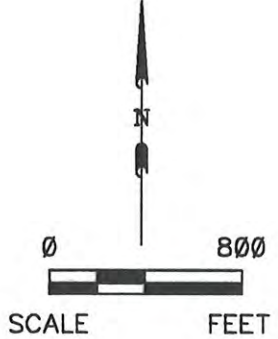
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VALERO PROPERTY

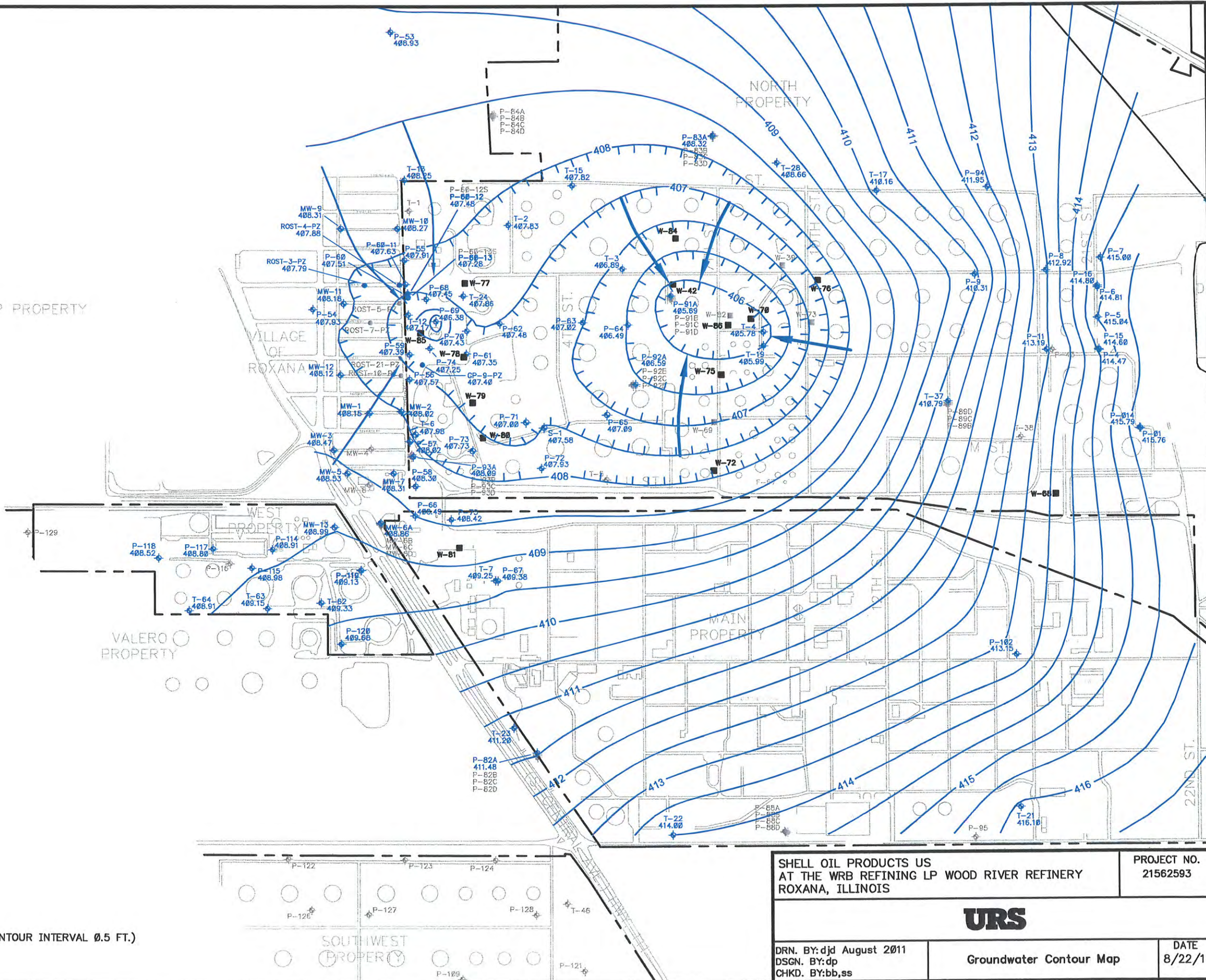
MAIN PROPERTY

SOUTHWEST PROPERTY

NORTH PROPERTY



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 - PIEZOMETER LOCATION GAUGED
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SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS	PROJECT NO. 21562593
DRN. BY: djd August 2011 DSGN. BY: dp CHKD. BY: bb, ss	DATE 8/22/11

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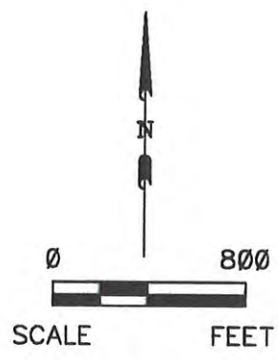
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VALERO PROPERTY

NORTH PROPERTY

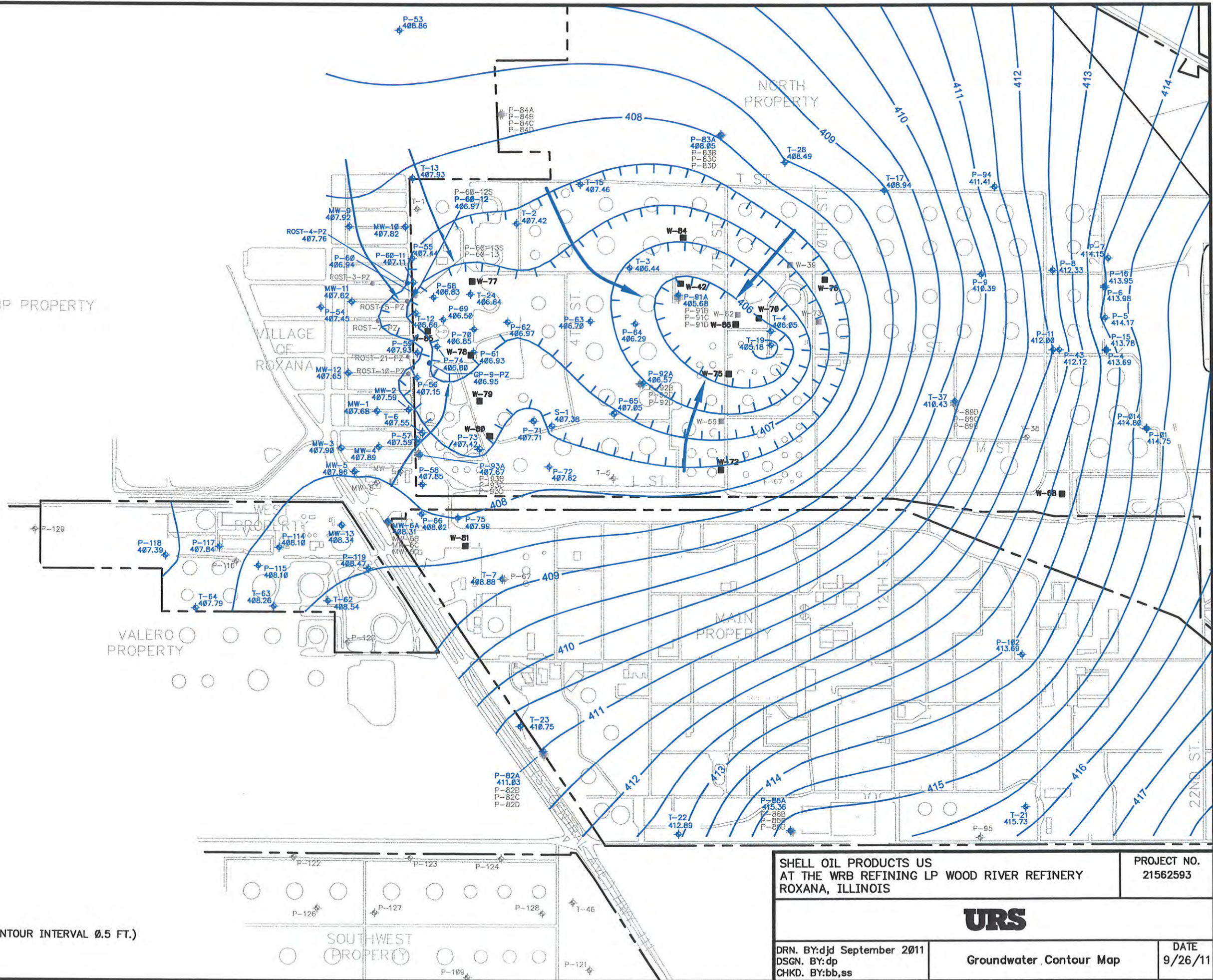
MAIN PROPERTY

SOUTHWEST PROPERTY



LEGEND

- ◆ MONITORING WELL LOCATION GAUGED
- PIEZOMETER LOCATION GAUGED
- WATER WELLS (OPERATING)
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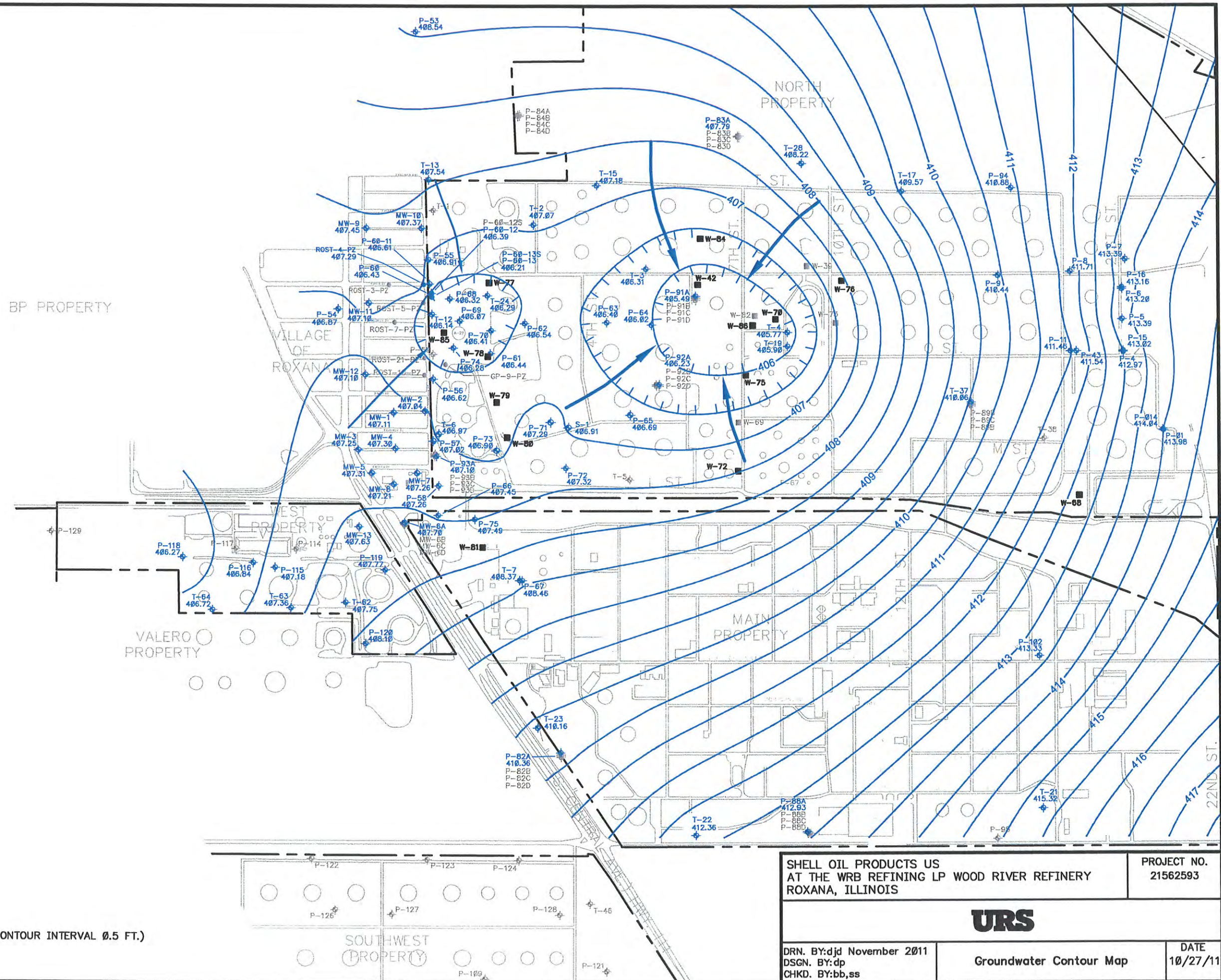


SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
URS		
DRN. BY:djd September 2011 DSGN. BY:dp CHKD. BY:bb,ss	Groundwater Contour Map	DATE 9/26/11

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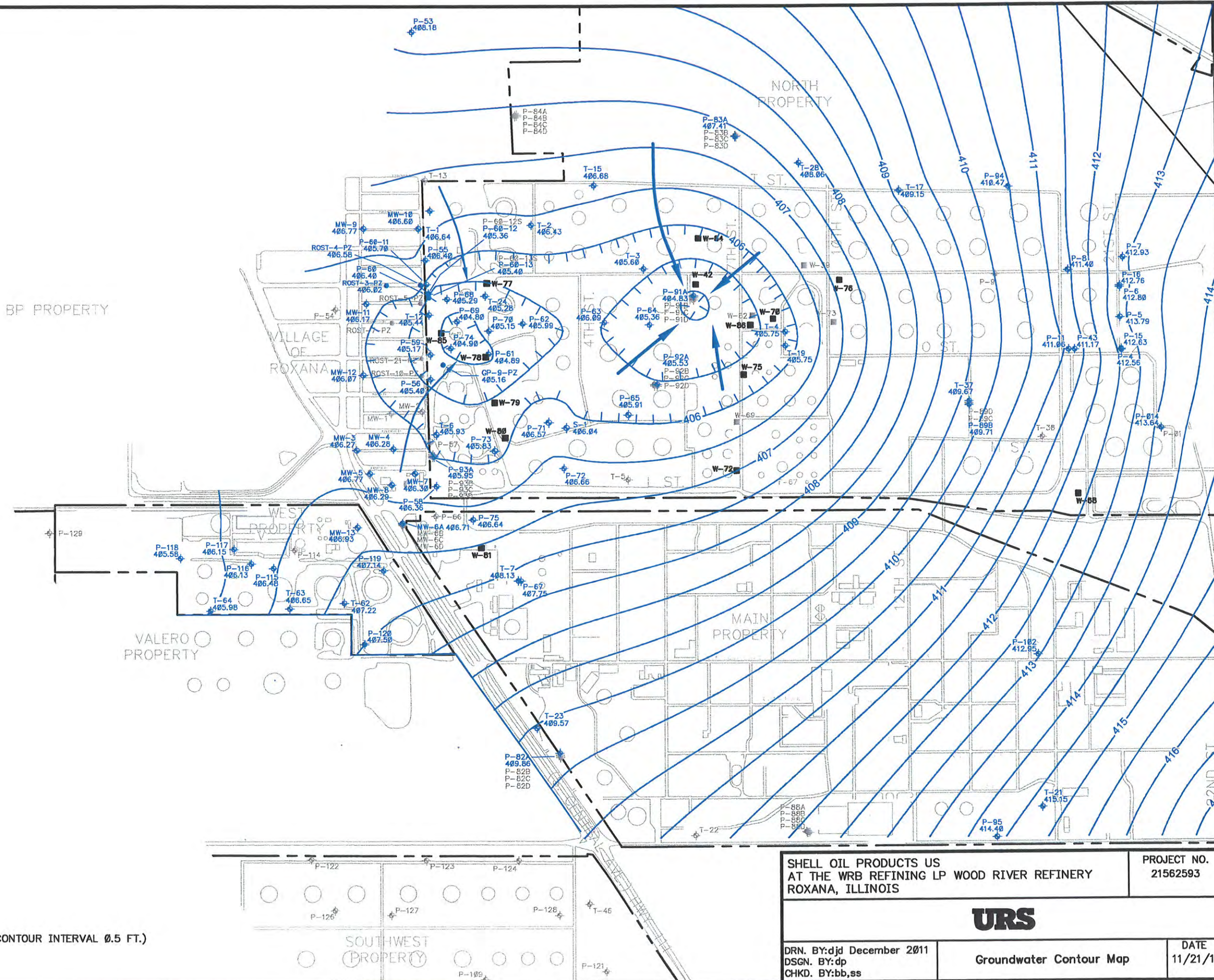
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 - PIEZOMETER LOCATION GAUGED
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SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
URS		
DRN. BY:djd November 2011 DSGN. BY:dp CHKD. BY:bb,ss	Groundwater Contour Map	DATE 10/27/11

File: P:\ENVIRONMENTAL\SHLL OIL PRODUCT US\C-WRR-COP-WRB WEEKLY WELL GAUGING\FIGURES\2H11\CONTOUR MAP (CONTOURS ON 10-27-11).DWG Last edited: JAN_05_12 @ 5:38 p.m. by: dcoyd_dcoyd

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FILE: P:\ENVIRONMENTAL\SHELL OIL PRODUCT US\C-WRR-COP-WRR-00P-WRR WEEKLY WELL GAUGING\FIGURES\2H11\ROXANNA 2H11 CONTOUR MAP (CONTOURS ON 11-21-11).DWG Last edited: JAN. 05. 12 @ 5:39 p.m. by: david_dequire



- LEGEND**
- ◆ MONITORING WELL LOCATION GAUGED
 - PIEZOMETER LOCATION GAUGED
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 - ➔ GROUNDWATER GRADIENT
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SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
URS		
DRN. BY:djd December 2011 DSGN. BY:dp CHKD. BY:bb,ss	Groundwater Contour Map	DATE 11/21/11

NOTES:

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BP PROPERTY

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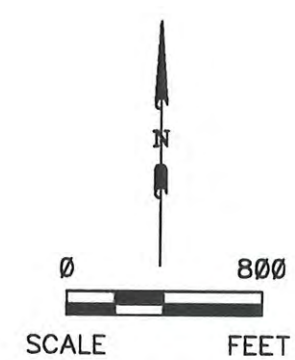
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VALERO PROPERTY

MAIN PROPERTY

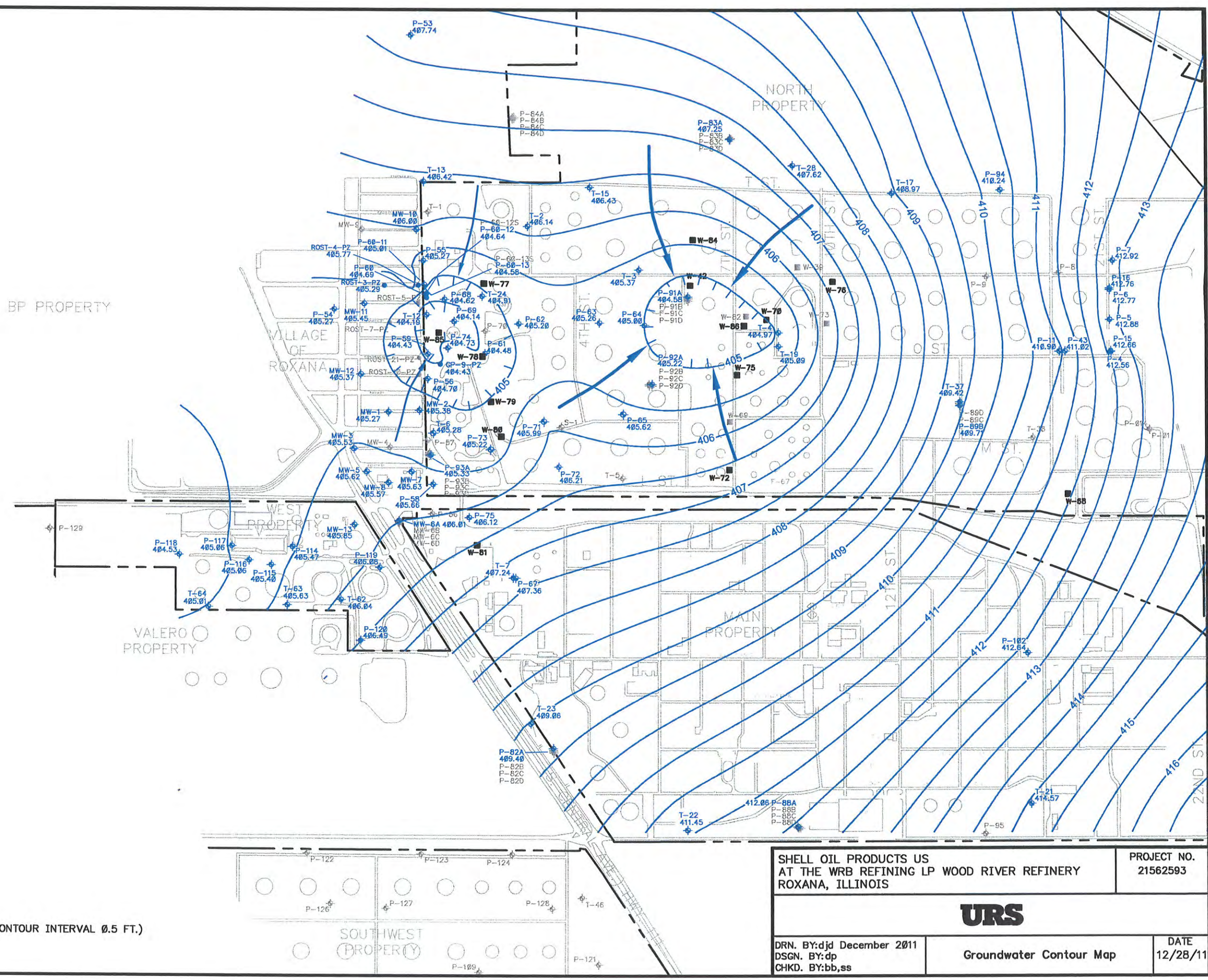
NORTH PROPERTY

SOUTHWEST PROPERTY



LEGEND

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SHELL OIL PRODUCTS US AT THE WRB REFINING LP WOOD RIVER REFINERY ROXANA, ILLINOIS		PROJECT NO. 21562593
URS		
DRN. BY:djd December 2011 DSGN. BY:dp CHKD. BY:bb,ss	Groundwater Contour Map	DATE 12/28/11