



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/524-3300

July 18, 2013

CERTIFIED MAIL

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

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

**RECEIVED**  
**JUL 22 2013**

Re: 1191150002 -- Madison County  
Equilon DBA Shell Oil Products  
ILD080012305  
Log No. B-43R-CA-33, CA-45, and CA-48  
Received: February 8, 2012; November 14, 2012; January 25, 2013; and March 14, 2013  
RCRA Permit  
Permit CA

Dear Mr. Dyer and Mr. Churchill:

This is in response to three (3) subject submittals, and two (2) submittals of additional information submitted on behalf of Shell Oil Products US (SOPUS) by URS Corporation (URS), with regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois. The submittals request to reduce the gauging frequency at wells associated with corrective action requirements for groundwater contamination present within the Village of Roxana, and an established Interim Groundwater Monitoring Network. These documents were reviewed as corrective action modification requests to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

The documents being responded to in this letter are as follows:

Submittal No. 1 – (Log No. B-43R-CA-33); A document entitled, “Status Update for Groundwater Pumping System and Request to Reduce Frequency of Gauging”, dated February 6, 2012, and received by the Illinois EPA February 8, 2012.

Submittal No. 2 – (Log No. B-43R-CA-45); A document entitled, “Update to February 4, 2011 Groundwater Flow Control Notification; Updated Response to Violation Notice L-2011-01126; and Request to Reduce Groundwater Gauging Frequency”, dated November 8, 2012, and received by the Illinois EPA November 14, 2012.

Additional Information to Submittal No. 2: A copy of Submittal No. 2 was submitted to provide the necessary Corrective Action Certification Form. The additional information was dated March 13, 2013 and received March 14, 2013.

Submittal No. 3 – (Log No. B-43R-CA-48); A document entitled, “Update to February 4, 2011 Groundwater Flow Control Notification; Updated Response to Violation Notice L-2011-01126; and Request to Reduce Groundwater Gauging Frequency”, dated January 23, 2013, and received by the Illinois EPA January 25, 2013.

Additional Information to Submittal No. 3: A copy of Submittal No. 3 was submitted to provide the necessary Corrective Action Certification Form and additional groundwater potentiometric figures. The additional information was dated March 13, 2013 and received March 14, 2013.

The subject submittals reviewed are subject to the conditions and modifications listed below with regards to groundwater:

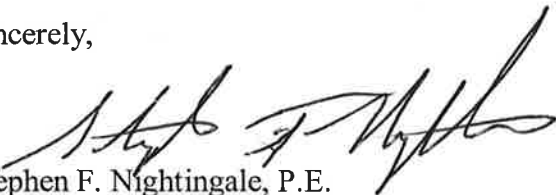
1. The submittal dated November 8, 2012, (Log No. B-43R-CA-45) cannot be approved. Per the Division of Legal Counsel, the Violation Notice cannot be modified in any way. The matter has been referred to the Office of the Attorney General for enforcement.
2. The Illinois EPA can approve the submittals dated February 6, 2012 (Log No. B-43R-CA-33) and January 23, 2013 (Log No. B-43R-CA-48), and the request to reduce gauging frequency with the following conditions and modifications:
  - a. The Illinois EPA concurs that weekly gauging is necessary at wells where product is detected. In addition, based on photoionization detector (PID) and lower explosive limit (LEL) readings collected at ROST-4-PZ area wells and the new wells installed in December 2012 and January 2013, there are locations with elevated PID and/or LEL readings that warrant continued frequent gauging, at this time. Specifically, the following wells require weekly gauging: ROST-3-MW; all ROST-4-PZ area wells, MW-19, and MW-22. 2.
  - b. All other Interim Groundwater Monitoring Network wells must be gauged monthly.
  - c. Gauging at the West Property and any other locations not listed above may return to quarterly gauging.
  - d. In addition to routine gauging data collected within each weekly, monthly, and quarterly gauging event, SOPUS must provide data for FPH detections, PID readings, and any exceedances of LEL collected at groundwater monitoring wells in the Interim Groundwater Monitoring Network. The quarterly groundwater monitoring reports must include this additional data collected during gauging events beginning with the 2<sup>nd</sup> Quarter 2013.

3. A plan must be submitted within sixty (60) days of the date of this letter for Illinois EPA review and approval, which proposes a plan to restore groundwater quality to 35 Ill. Adm. Code Part 620, Class I Groundwater Quality Standards (GQSs) within the Study Area. The plan must also include an evaluation of the addition of individual flow meters at the pumping wells in the vicinity of the Study Area.
4. The schedule for gauging wells must be made available to the inspector Gina Search of the Illinois EPA Collinsville Field Operations Section Office, and changes to that schedule communicated to the inspector 48 hours prior to data collection.
5. A completed RCRA Corrective Action Certification form must accompany all submittals made to the Illinois EPA regarding RCRA corrective action activities.
6. RCRA corrective action activities carried out at the facility including off-site activities as necessary, must meet the requirements of: (1) 35 Ill. Admin. Code 724.201; (2) the facility's Permit; and (3) Illinois EPA letters regarding such activities.

Work required by this letter, your modification requests 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.

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 James K. Moore, P.E. at 217/524-3295.

Sincerely,



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

SFN:AMB:1191150002-RCRA-B43RCA33-B43RCA45-B43RCA48-Denial-Approval.docx

cc: <sup>IBM ABM JCM</sup> Robert Mooshegian, URS  
Eric Peterson, ConocoPhillips