

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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Shell Oil Products US Attn: Kevin Dyer 17 Junction Drive PMB #399 Glen Carbon, Illinois 62304 WRB Refining LLC Wood River Refinery Attn: Brian Wulf 900 South Central Avenue P.O. Box 76 Roxana, Illinois 62084

Re:

1191150002-Madison County

Equilon Enterprises d/b/a Shell Oil Products US

ILD 080 012 305

Log No. B-43R-CA-82, 88, 94 and 97

Received: July 7, 2014, August 3, 2015, April 5, 2017 and June 30, 2017

RCRA Permit Permits CA

Dear Mr. Dyer and Mr. Wulf:

This is in response to the July 3, 2014, August 3, 2015, April 4, 2017 and June 29, 2017 submittals from AECOM made on your behalf regarding certain aspects of the RCRA corrective action activities and groundwater monitoring/remediation efforts being carried out by Shell Oil Products US (Shell) at the above-referenced RCRA permitted facility. This facility is located at 900 South Central Avenue, Roxana, Illinois; the RCRA permit for this facility was renewed on October 28, 2010 and last revised on July 29, 2015.

The specific submittals being responded to herein are as follows:

<u>Submittal No. 1</u> – The submittal entitled "Routine Updates to Previously Submitted Standard Operating Procedures" is dated July 3, 2014, and was received by the Illinois EPA on July 7, 2014.

<u>Submittal No. 2</u> – The submittal entitled "Routine Updates to Previously Submitted Standard Operating Procedures" is dated August 3, 2015 and was received by the Illinois EPA on August 6, 2015.

<u>Submittal No. 3</u> – The submittal entitled "Routine Updates to Previously Submitted Standard Operating Procedures" is dated April 4, 2017 and was received by the Illinois EPA on April 5, 2017.

<u>Submittal No. 4</u>—The subject submittal entitled "Routine Updates to Previously Submitted Standard Operating Procedures", is dated June 29, 2017 and was received by the Illinois EPA on June 30, 2017.

As their names imply, each of the above submittals contain certain updated standard operating procedures used in carrying out the RCRA corrective action efforts, groundwater monitoring and groundwater remediation efforts required to be implemented by the subject facility's RCRA permit. These submittals were handled as modification requests to the approved corrective action RCRA program being carried out at the above-referenced facility and are hereby approved subject to the following conditions and modifications:

- Within ninety (90) days, must submit, as a Class 1* permit modification request, revised pages to Section C.7.5 of the Approved Permit Renewal Application to refer to the most current SOPs. A completed LPCPA-23 form must accompany this submittal.
- Corrective action activities at the subject facility must be carried out in accordance with: (1) 35 Ill. Adm. Code 620, 724 and 742; (2) the facility's RCRA permit; and (3) Illinois EPA letters regarding such activities.
- 3. A completed RCRA Corrective Action Certification form must accompany all information submitted to Illinois EPA regarding RCRA corrective action activities at the subject facility.

Work required by this letter, your 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 Act of 1989, the Professional Geologist Licensing Act and the Structural Engineering Act of 1989. This letter does not relieve anyone from compliance with these laws. All work that falls within the scope and definition of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation to the appropriate regulating authority.

Should you have any questions regarding groundwater related aspects of the corrective action being carried out at this facility, please contact Amy Boley at 217/558-4716. If you have questions regarding other aspects of corrective action, please contact William T. Sinnott, II at 217/524-3310.

Sincerely,

Theodore J. Dragovich, P.E., Acting Manager

Permit Section

Division of Land Pollution Control

Theodore & Dragoul

Bureau of Land

TJD:WTS:1191150002-RCRA-B43R-CA-82, 88, 94, and 97