

AECOM 100 Nor h Broadway 20th Floor St. Louis, MO 63102 aecom.com

February 21, 2021

Mr. Rob Watson, PE Senior Engineer Illinois EPA BOL, Permit Section #33 1021 North Grand Ave East Springfield, IL 62702

Contained-In Determination Pretreatment Water Management Roxana, Illinois 1191150002 - Madison County Log No. B-34R

Dear Mr. Watson:

AECOM Technical Services, Inc. (AECOM), on behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (SOPUS), is submitting a determination that environmental media generated during remediation activities at the Roxana Public Works Yard (Site) may not contain hazardous waste.

EPA's "contained-in" policy states that contaminated environmental media is subject to all applicable RCRA requirements until they no longer contain hazardous waste. EPA considers contaminated environmental media to no longer contain hazardous waste when:

- It no longer exhibits a characteristic of hazardous waste, or
- Concentrations of listed hazardous waste are below health-based levels.

Once these requirements are met, the environmental media is not subject to RCRA requirements. The groundwater generated at the Site during operation of the proposed Steam Enhanced Extraction (SEE) system is expected to meet these criteria after treatment in the proposed SEE's system groundwater treatment unit. Therefore, AECOM believes the environmental media will no longer contain hazardous waste after treatment.

The following paragraphs provide further information:

#### Name, address, phone number of property owner

The Site is located south of East 8<sup>th</sup> Street between Chaffer Avenue and Old Edwardsville Road in Roxana, Illinois. The Site is owned by the Village of Roxana:

Marty Reynolds, Mayor Village of Roxana 143 East 8<sup>th</sup> Street Roxana, IL 62084 618-254-1951

#### Name, address, phone number of operator (if different than owner)

AECOM, on behalf of SOPUS, will be the operator of the proposed SEE system at the Site. Contact information is presented below:

Mr. Leroy (Buddy) Bealer Principal Program Manager Shell Oil Products US 128 East Center St Nazareth, PA 18064 (484) 632-7955 Mrs. Wendy Pennington Project Manager AECOM 100 North Broadway 20<sup>th</sup> Floor St. Louis, MO 63102 314-452-8929

#### Facility name and Bureau of Land ID number for the site

Roxana Public Works Yard

BOL ID# 1191150002

# Brief history of the site and its previous operations, whether it is enrolled in the Site Remediation Program (SRP), and the reason for the Contained-In Determination request

The Site is located to the east of a 1986 benzene pipeline release located northwest of the intersection of Rand Avenue and Route 111, and to the west of the Wood River Refinery (WRR) North Property West Fenceline. The Site is managed under the Corrective Action section of the SOPUS RCRA Part B Hazardous Waste Post-Closure Permit at the Wood River Refinery (Permit) most recently modified December 20, 2019. The Site is not enrolled in the SRP.

The Roxana Public Works Yard occupies approximately 2.4 acres, where approximately 0.4 acres is covered or obstructed by buildings and/or structures. Topographically, the western and southern portions of the Site are at a lower elevation relative to the northeastern portion, with a relief of approximately 13 feet. The Site is infrequently used by the Village of Roxana for vehicle maintenance and storage. Most of the Site is enclosed by a chain link fence.

AECOM, on behalf of SOPUS, has conducted several subsurface investigations at the Public Works Yard and began quarterly groundwater monitoring in 2010. These investigations indicated dissolved-phase benzene concentrations ranging from 100 mg/L to 1,900 mg/L. In 2011, a Soil Vapor Extraction (SVE) system compound was constructed on the neighboring WRR North Property, which includes a header-line connecting to six extraction wells at the Site. There are also eight multilevel vapor monitoring points (VMPs) and two groundwater monitoring wells at the Site. The SVE system has operated at the Site since late 2012. Soil vapor data from the Site demonstrates the shallow and intermediate zones have been remediated. Deep (>25 feet below ground surface) soil gas concentrations have also decreased over time but remain elevated in some areas with fluctuating groundwater levels and submerged impacts. The proposed SEE system at the Site is utilizing a more aggressive remedial technology to reduce the highest benzene concentrations observed at the Site.

AECOM is requesting that IEPA concur with this "contained-in" determination so the groundwater generated from the proposed SEE system can be managed as nonhazardous waste and treated at a nearby publicly owned treatment works (POTW).

# Description of remediation activities at the site, the units involved, how they are regulated, and an estimate of the amount (gallons) and generation rate of contaminated water that is the subject of this request

The Steam Enhanced Extraction system can be broken down into three parts: a steam injection system, a multiphase extraction system, and a water treatment system.

The steam injection portion of the system will consist of a steam boiler fed by natural gas meant to convert potable water to steam. Steam will be heated to temperatures that exceed the minimum required temperature to volatize the constituent of concern (benzene) and will be injected via a network of wells spaced on 30-foot centers within the treatment areas.

The multiphase extraction system will extract both liquid and vapor from the treatment areas, where the two phases will be separated, managed, and treated separately. Upon initial extraction, the combined vapor and liquid stream will pass through a 5,000-gallon silt/liquid/vapor knockout tank to separate liquids from vapors. Vapors will then pass through two additional knockouts before being directed to the existing regenerative thermal oxidizer (RTO) located on the adjacent Phillips 66 Wood River Refinery property. Should the RTO experience an upset condition (i.e., power outage), the vapor stream will be directed to two 2,500-lbs sacrificial vapor granular-activated carbon vessels. The



liquid stream will pass through an oil-water separator where any NAPL will be segregated and containerized before the liquid phase passes through an air-stripper. All vapors stripped from the liquid phase at this point will pass through another knockout before combining with the vapor stream being directed to the RTO.

The water treatment portion of the system begins with the aforementioned air-stripper where the liquid phase will then pass through six sets of bag filters, ending with two 2,000 lb liquid-phase activated carbon treatment vessels before it is pumped into a 5,000-gallon storage tank that will then discharge to the Roxana POTW.

It is anticipated that a total 6.8 million gallons of water will be extracted and treated over the duration of the SEE project. This equates to an average of 26 gallons per minute of treated water discharge, given the projected 180 day run time of the SEE system.

Identification of the process/source of the listed hazardous waste(s) generated or managed at the facility and all applicable hazardous waste codes

Since the environmental media contains benzene that potentially originated from a commercial product benzene release, the media (groundwater) may be classified with a U019 listed hazardous waste code with a Land Disposal Restriction (LDR) of 0.14 mg/L. Benzene concentrations contained in the media may exceed 0.5 mg/L, which would cause the media to be a characteristically hazardous waste with a D018 characteristically hazardous waste toxicity code.

Analytical results, or a commitment, that demonstrates the wastewater going to the POTW meets the following conditions: (1) does not exhibit a characteristic of a hazardous waste; (2) meets the LDR at 35 IAC 728 including standards for all underlying hazardous constituents (UHCs) that may be present, and (3) meets the pre-treatment standards for the POTW

Extracted groundwater will be separated from the vapor stream via a knockout prior to being pumped to an oil-water separator, where any NAPL will be segregated. Liquids will then be passed through the following in the order listed: an air-stripper, three pairs of bag filters, and then two 2,000 lb liquid-phase activated carbon treatment vessels. Treated water will then be pumped into a 5,000-gallon equalization tank from which the water can be sampled prior to discharge.

After treatment, the collected groundwater will be analyzed for benzene (constituent of primary concern). If the benzene concentrations in the treated groundwater meet the criterion in Table 1 below, the groundwater will be considered to no longer contain hazardous waste. AECOM will regularly analyze treated groundwater to demonstrate continued effectiveness in meeting the criteria outlined in Table 1 below.

Constituent	Criterion	Source/Logic
Benzene	0.14 mg/L	35 IAC 728 LDR; also satisfies 0.5 mg/L hazardous waste characterization threshold

Scaled drawing of the facility showing all structures, extent of contaminated groundwater subject to this request, sample locations (and depths) that are representative of the contaminated groundwater that is subject to this request

The contaminated groundwater will be extracted by the proposed SEE system from wells screened from 24 to 57 feet below ground surface in the permeable Main Sand aquifer. The locations of the wells are shown on the attached system layout figure. The primary zone of impact and focus area for the thermal treatment is located from 34 to 54 feet below ground surface. No groundwater samples will be collected from the Site during active remediation due to safety concerns. Extracted groundwater will be sampled regularly from the 5,000-gallon holding tank, to make sure the water treatment is continually efficient. See the attached figures for SEE system well field layout, well completion drawings, well head construction details, process flow diagram, and process and instrumentation diagram.

# **AECOM**

See the attached Wastewater Treatment Plant Capacity Increase Village of Roxana for the existing features currently on the Roxana Public Works Yard Site.

Scaled drawing of the POTW showing all structures, units, property line, and location where the wastewater will be discharged to the POTW

Please see the attached *Wastewater Treatment Plant Chemical Feed Improvements Village of Roxana* for a Scaled Drawing of the Roxana, Illinois POTW.

Verification that the POTW currently has a USEPA approved pretreatment program (including when program was approved)

The Roxana POTW does not currently have any influent pretreatment standards. They primarily process leachate from the local landfill. The Roxana POTW operates under NPDES Permit IL-0077356. The Village of Roxana is currently working on passing a wastewater treatment ordinance.

If you have additional questions or comments regarding this information, please do not hesitate to contact me at <a href="mailto:wendy.pennington@aecom.com">wendy.pennington@aecom.com</a> or (314) 452-8929.

Sincerely,

Wendy Pennington, PE Project Manager

AECOM

M: 314-452-8929

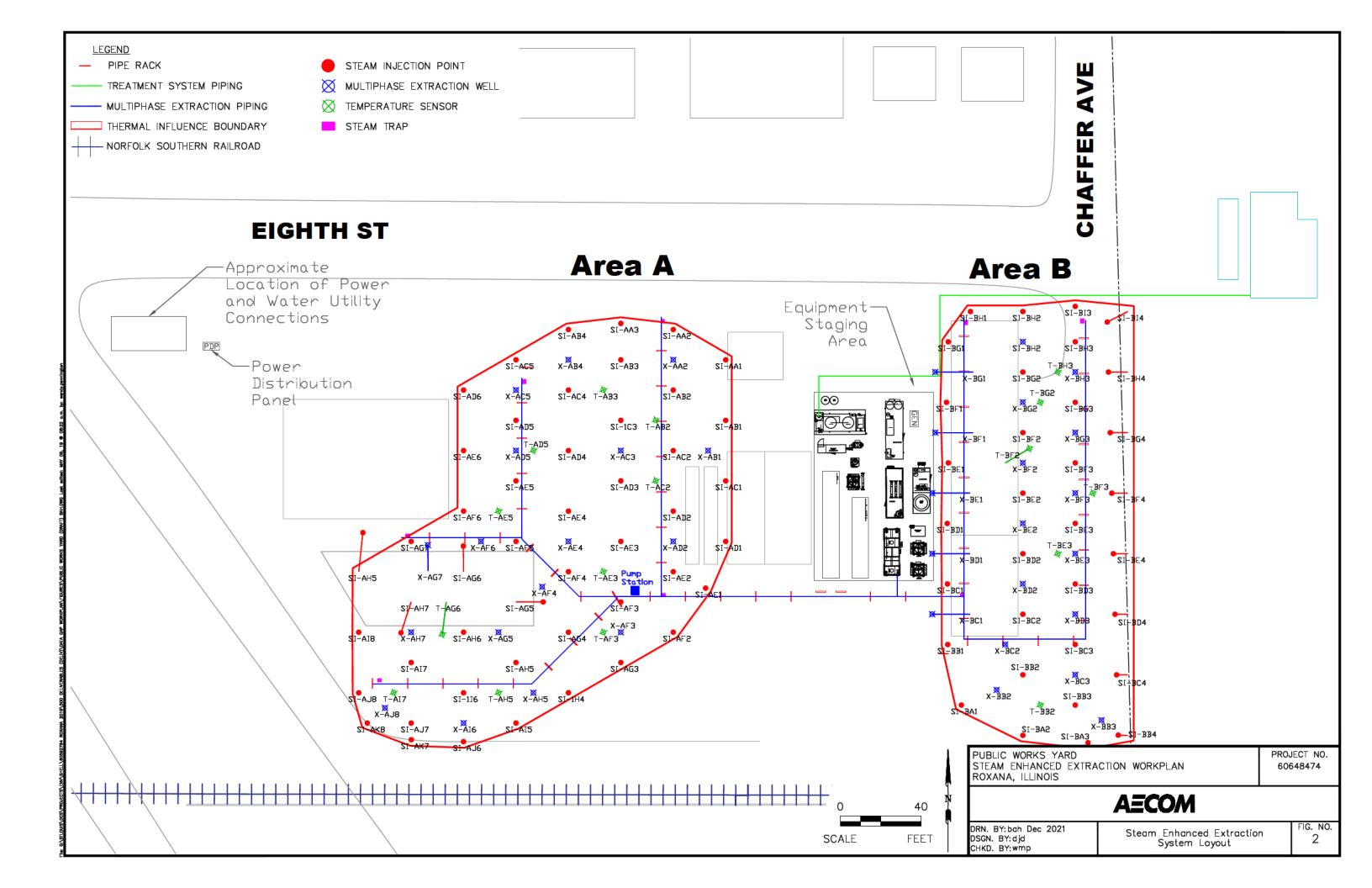
E: wendy.pennington@aecom.com

Enclosures: Figures to support above information

Cc: Leroy (Buddy) Bealer, SOPUS

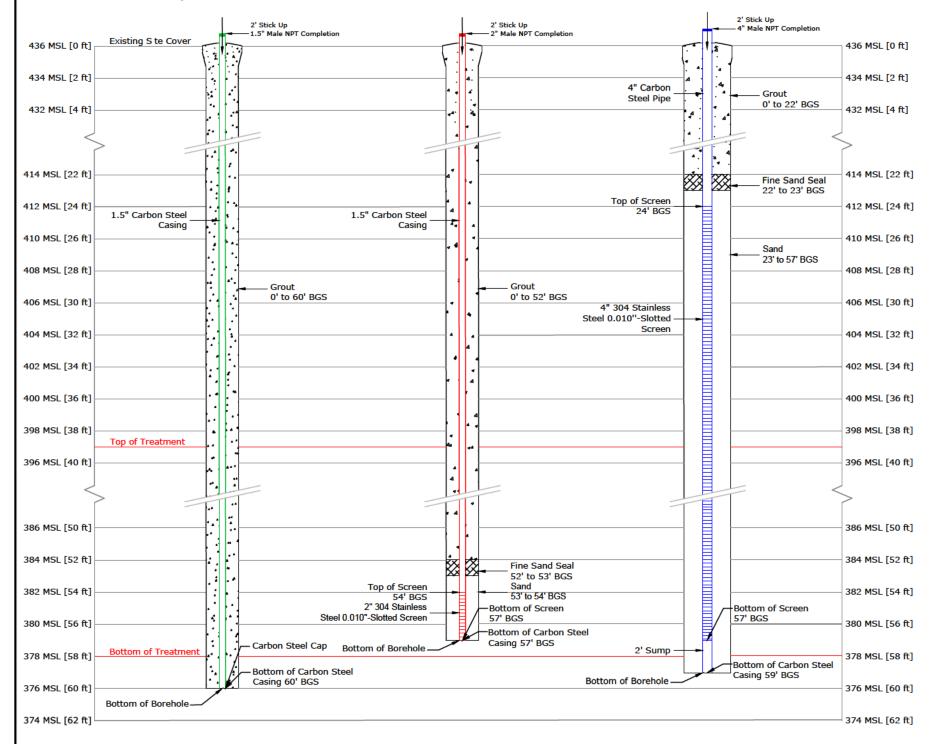
Repositories (Roxana website, Roxana Public Library)

Project File



# **AREA A**

DIGITAM™ TEMPERATURE SENSOR WELL QUANTITY - 9 STEAM INJECTION WELL QUANTITY - 44 MULTIPHASE EXTRACTION WELL QUANTITY - 16



## **GENERAL NOTES:**

- MATERIAL TYPES
  - A. GROUT
  - HIGH TEMPERATURE PORTLAND TYPE 1 OR EQUIVALENT (NO BENTONITE)
  - B. SAND
  - FINE SAND SEAL: 40/60 SILICA SAND
  - STEAM INJECTION/EXTRACTION WELLS: 20/40 SILICA SAND
- 2. STEAM INJECTION WELLS
  - A. MINIMUM 4" DIAMETER BOREHOLE
  - B. 2" SCHEDULE 40 CARBON STEEL CASING
  - C. NOMINAL 2" DIAMETER WIRE-WRAPPED 304 STAINLESS STEEL 0.010"-SLOTTED SCREEN
- 3. TEMPERATURE WELLS
  - A. MINIMUM 4" DIAMETER BOREHOLE
  - B. 1.5" SCHEDULE 40 CARBON STEEL CASING
  - C. THREADS CAN BE NPT OR FLUSH JOINT
  - D. STICKUP MUST BE MALE NPT
  - E. ALL JOINTS TO BE TIGHTENED WITH PIPE WRENCH USING PIPE THREAD COMPOUND AND PTFE TAPE
- 4. MULTIPHASE EXTRACTION WELLS
  - A. MINIMUM 8" DIAMETER BOREHOLE
  - B. 4" SCHEDULE 40 CASING
  - C. NOMINAL 4" DIAMETER WIRE-WRAPPED 304 STAINLESS STEEL 0.010"-SLOTTED SCREEN
  - D. FITTINGS BETWEEN PIPE SECTIONS ARE 4 THREAD PER INCH (TPI) FLUSH THREADED UNLESS SPECIFIED OTHERWISE (IE M NPT OR PLUG)
  - E. 4" NPT FEMALE X WELD PLATE ENDS



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B2	2021/09/28	90% DESIGN	JS	CC	CC
B1	2021/08/27	60% DESIGN	JS	CC	CC
A1	2021/08/29	NOT FOR CONSTRUCTION	CC	CC	
A2	AFEA	FAMILY MUMBER:	P09178	SCALE	NOT TO SCALE
APEA	FERMIT MUMBER:	P09178	SCALE	NOT TO SCALE	

**ET-DSP™ Well Completion Drawing** 

AECOM Roxa

Roxana Public Works Yard Roxana, Illinois

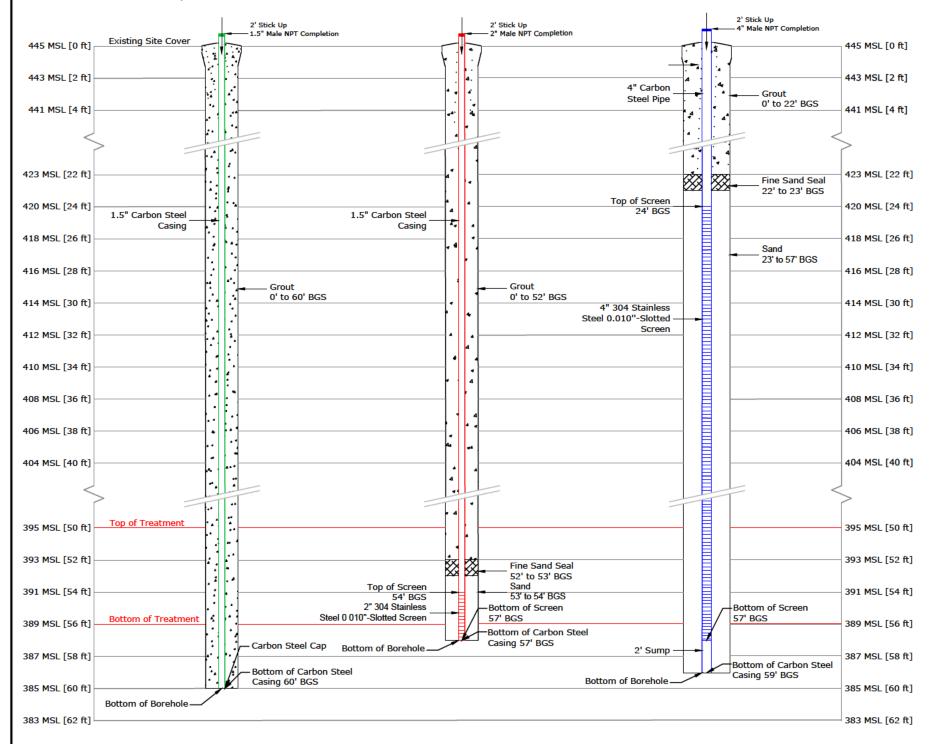
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# **AREA B**

DIGITAM™ TEMPERATURE **SENSOR WELL QUANTITY - 5** 

STEAM INJECTION WELL **QUANTITY - 31** 

**MULTIPHASE EXTRACTION** WELL **QUANTITY - 12** 



## **GENERAL NOTES:**

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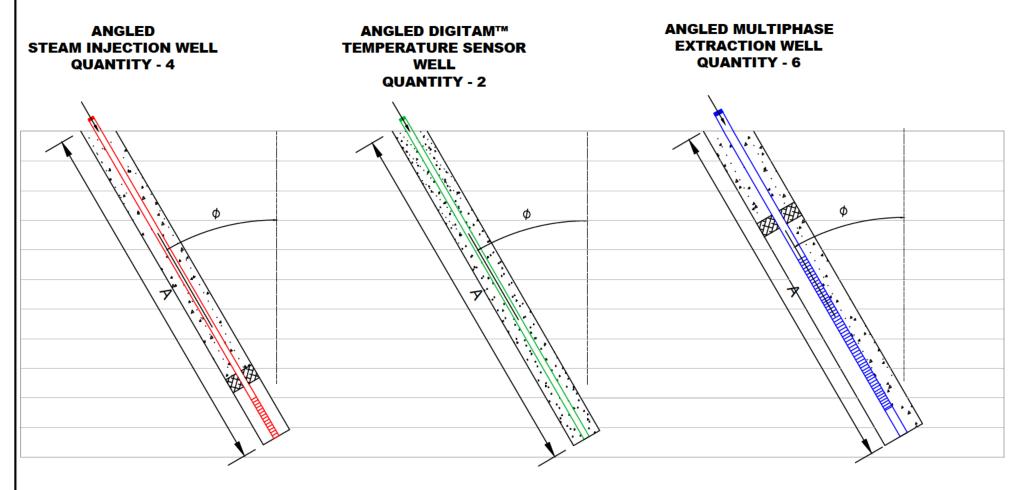
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**ET-DSP™ Well Completion Drawing** 

**AECOM** 

Roxana Public Works Yard Roxana, Illinois

**WCD-02** 



ANGLED WELL DETAILS							
Well	Ø	Α	Well	Ø	Α		
SI-AH5	18.83	60.22	X-BD1	17.63	61.90		
SI-AH7	15.73	59.21	X-BE1	17.63	61.90		
SI-AG6	12.56	58.39	X-BF1	17.63	61.90		
SI-AG5	13.30	58.57	X-BG1	17.63	61.90		
X-AG7	12.15	60.35	T-AG6	15.34	62.21		
X-BC1	17.63	61.90	T-BF2	20.24	63.00		

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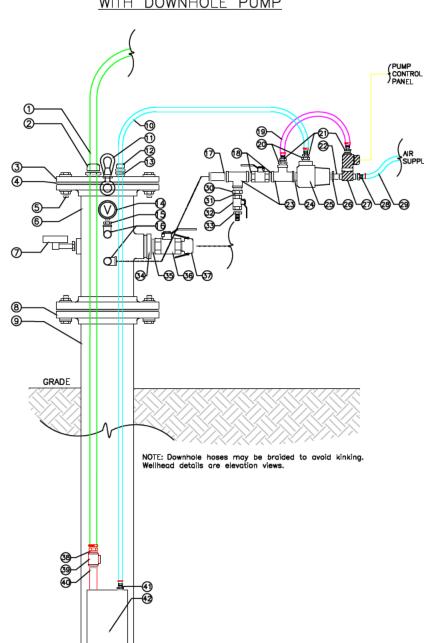
**ET-DSP™ Well Completion Drawing** 

**AECOM** 

Roxana Public Works Yard Roxana, Illinois

**WCD-03** 

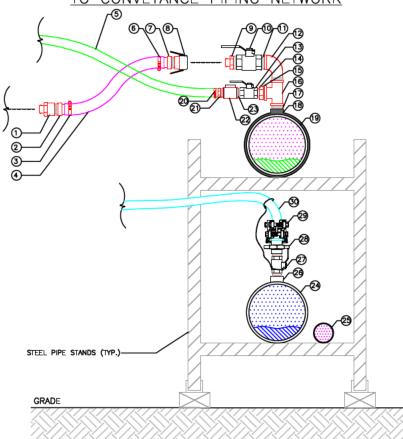
# MULTIPHASE EXTRACTION WELL WITH DOWNHOLE PUMP



#### WELLHEAD COMPONENTS

- 1. 1/2" ID PTFE GROUNDWATER EXTRACTION LINE
- 2. 1/2" X 3/4" M NPT CORD GRIP, PVDF
- CONTROL 3. 4" Ø 150# WELL COVER PLATE, STEEL
  - 4. 4" ø 150# X 1/8" GASKET, VITON (TYP.)
  - 5. 5/8" BOLT, LOCK WASHER & HEX NUT, ZINC (TYP.)
  - 6. 4" Ø Mc2 WELLHEAD X 150# FLANGE ENDS, STEEL
  - 7. TEMPERATURE GAUGE 0-250°F X 1/2" M NPT
  - 8. 4" ø 150# FLANGE X 4" F NPT, STEEL
  - 9. 4" Ø M NPT RISER STICKUP, CARBON STEEL
  - 10. 1/4" ID PTFE COMPRESSED AIR HOSE
  - 11. 1/2" LIFTING EYE ASSEMBLY, WITH GASKET
  - 12. 3/8" X 1/2" M NPT CORD GRIP, PVDF
  - 13. 3/4" M NPT X 1/2" F NPT BUSHING, GALV.
  - 14. VACUUM GAUGE, 0-30" HG X 1/4" M NPT
  - 15. 1/2" M NPT X 1/4" F NPT BUSHING, BRASS
  - 16. 1/2" NPT STREET ELBOW, BRASS
  - 17. 1/2" X 3" NIPPLE, GALV.
  - 18. 1/2" NPT CLOSE NIPPLE, GALV.
  - 19. 1/4" ID ORTAC VENT HOSE
  - 20. 1/2" M NPT X 1/4" F NPT BUSHING, BRASS
  - 21. 1/4" M NPT X 1/4" HOSE BARB, BRASS
  - 22. 1/4" X 3" NIPPLE, GALV.
  - 23. 1/2" NPT PIPE TEE, GALV.
  - 24. 1/2" NPT CLOSE NIPPLE, GALV.
  - 25. 1/2" SUPER QUICK EXHAUST VALVE
  - 26. 1/2" M NPT X 1/4" F NPT BUSHING, BRASS
  - 27. 1/4" 3-WAY SOLENOID VALVE
  - 28. 1/4" M NPT X 1/4" HOSE BARB, BRASS
  - 29. 1/4" ID ORTAC COMPRESSED AIR HOSE
  - 30. 1/2" M NPT X 3/8" F NPT BUSHING, GALV.
  - 31. 3/8" NPT CLOSE NIPPLE, BRASS
  - 32. 3/8" NPT BALL VALVE, BRASS
  - 33. 3/8" M NPT X 1/4" HOSE BARB, BRASS
  - 34. 2" M NPT X 1-1/2" F NPT REDUCER BUSHING, GALV.
  - 35. 1-1/2" NPT CLOSE NIPPLE, GALV.
  - 36.1-1/2" NPT BALL VALVE, BRASS
  - 37. 1-1/2" M NPT X 1-1/2" FEMALE CAMLOCK (PART B), ALUM.
  - 38. 1/2" M NPT X 3/4" HOSE BARB, BRASS
  - 39. 3/4" SWING CHECK VALVE, BRASS
  - 40. 3/4" X 6" NIPPLE, GALV.
  - 41. 1/4" M NPT X 1/4" HOSE BARB, BRASS
  - 42. PNEUMATIC PUMP WITH TOP-LOADING CUP ADAPTER

## MULTIPHASE EXTRACTION WELL CONNECTION TO CONVEYANCE PIPING NETWORK

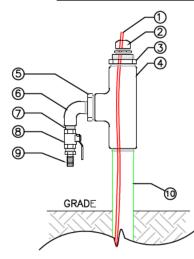


NOTE: Main conveyance pipe is interconnected with dresser couplings and sloped at approximately 1 degree from horizontal towards the inlet of the treatment system. Multiphase flow regime may not be as illustrated. Details are elevation views.

#### PIPING CONNECTION COMPONENTS

- 1. 1-1/2" M CAMLOCK TO 1-1/2" F NPT (PART A), ALUM. ALLOY
- 2. 1-1/2" M NPT TO X 1-1/2" PEX BARB
- 1-1/2" HOSE CLAMP
- 4. 1-1/2" ID PEX VAPOR EXTRACTION HOSE
- 5. 1/2 " ID PTFE GROUNDWATER EXTRACTION HOSE
- 6. 1-1/2" HOSE CLAMP
- 7. 1-1/2" PEX BARB X 1-1/2" M NPT
- 8. 1-1/2" F NPT X 1-1/2" F CAMLOCK (PART D), ALUM. ALLOY
- 9. 1-1/2" M CAMLOCK X 1-1/2" M NPT (PART F), ALUM. ALLOY
- 10. 1-1/2" NPT BALL VALVE, BRASS
- 11. 1-1/2" NPT CLOSE NIPPLE, GALV.
- 12. 1-1/2" NPT STREET ELBOW, GALV.
- 13. 1/2" NPT BALL VALVE, BRASS
- 14. 1/2" NPT CLOSE NIPPLE, GALV.
- 15. 1-1/2" M NPT X 1/2" F NPT REDUCER BUSHING, GALV.
- 16. 1-1/2" F NPT X 1-1/2" F NPT X 1-1/2" F NPT TEE, GALV.
- 17. 1-1/2" NPT CLOSE NIPPLE, GALV.
- 18. 1-1/2" F NPT PIPE SADDLE, CARBON STEEL
- 19. 2" TO 12" Ø PIPE HEADER, CARBON STEEL
- 20. 1/2" HOSE CLAMP
- 21. 1/2" M NPT TO X 1/2" HOSE BARB
- 22. 1/2" SWING CHECK VALVE, BRASS
- 23. 1/2" NPT CLOSE NIPPLE, GALV.
- 24. 2" to 6" Ø STEAM HEADER, CARBON STEEL
- 25. 1" Ø AIR SUPPLY LINE, CARBON STEEL
- 26. 1" F NPT WELDOLET, CARBON STEEL
- 27. 1" NPT BALL VALVE, SS
- 28. 1" HAMMER LOCK ASSEMBLY, ZINC PLATED DUCTILE IRON
- 29. 1" COLLAR LOCK BOLT CLAMP, PLATED DUCTILE IRON
- 30. 1" STEAM HOSE

## TEMPERATURE MONITORING POINT



#### TEMPERATURE COMPONENTS

- 1. TEMPERATURE SENSOR STRING, 3/8" STRING DIA.
- 2. 3/8" X 3/4" M NPT CORD GRIP, NYLON
- 3. 1-1/2" M NPT X 3/4" F NPT BUSHING, GALV.
- 4. 1-1/2" NPT PIPE TEE, GALV.
- 5. 1-1/2" M NPT X 3/8" F NPT BUSHING, GALV.
- 6. 3/8" NPT STREET ELBOW, GALV.
- 7. 3/8" NPT CLOSE NIPPLE, GALV.
- 8. 3/8" NPT BALL VALVE, BRASS
- 9. 3/8" M NPT X 1/4" HOSE BARB, BRASS
- 10. 1-1/2" M NPT CARBON STEEL RISER STICKUP

NOTE: Wellhead details are elevation views.



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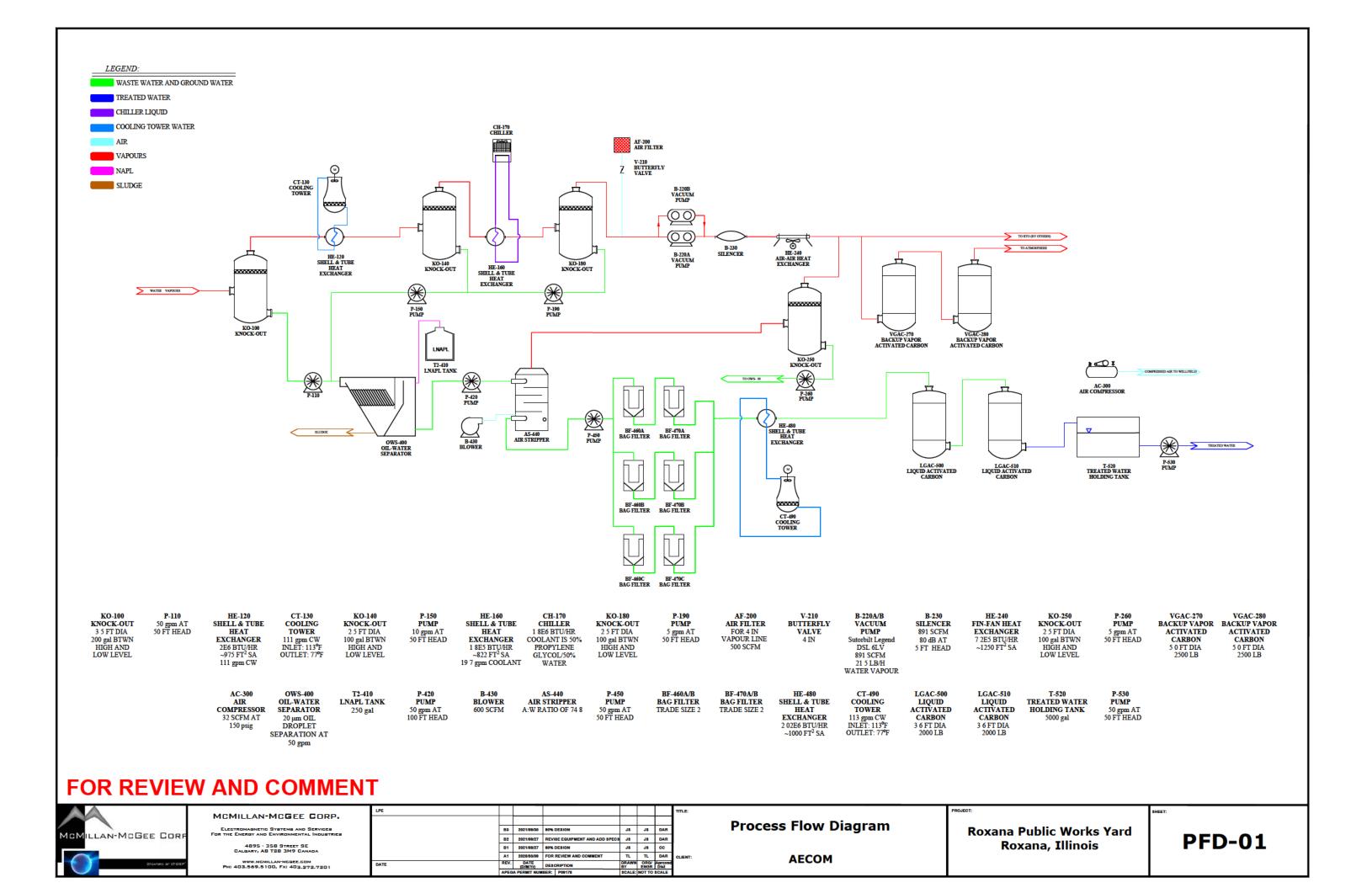
	B2	2021/09/28	90%	DESIGN	JS	СС	cc	ı
	B1	2021/08/27	60%	DESIGN	JS	СС	СС	ı
	АЗ	2021/08/27	UPD	ATE PEX LINE	JS	СС	cc	ı
	A2	2021/08/24	UPD	ATE NUMBERING	JS	СС	cc	ı
	A1	2021/08/18	NOT	FOR CONSTRUCTION	JS	СС	cc	CI
DATE	REV.	DATE (D/M/Yr)	DESC	CRIPTION	DRAWN BY	ORG/ ENGR	Aproved Dist	ı
	APEG	A PERMIT NUM	BER:	P09178	SCALE:	NOT TO	SCALE	L

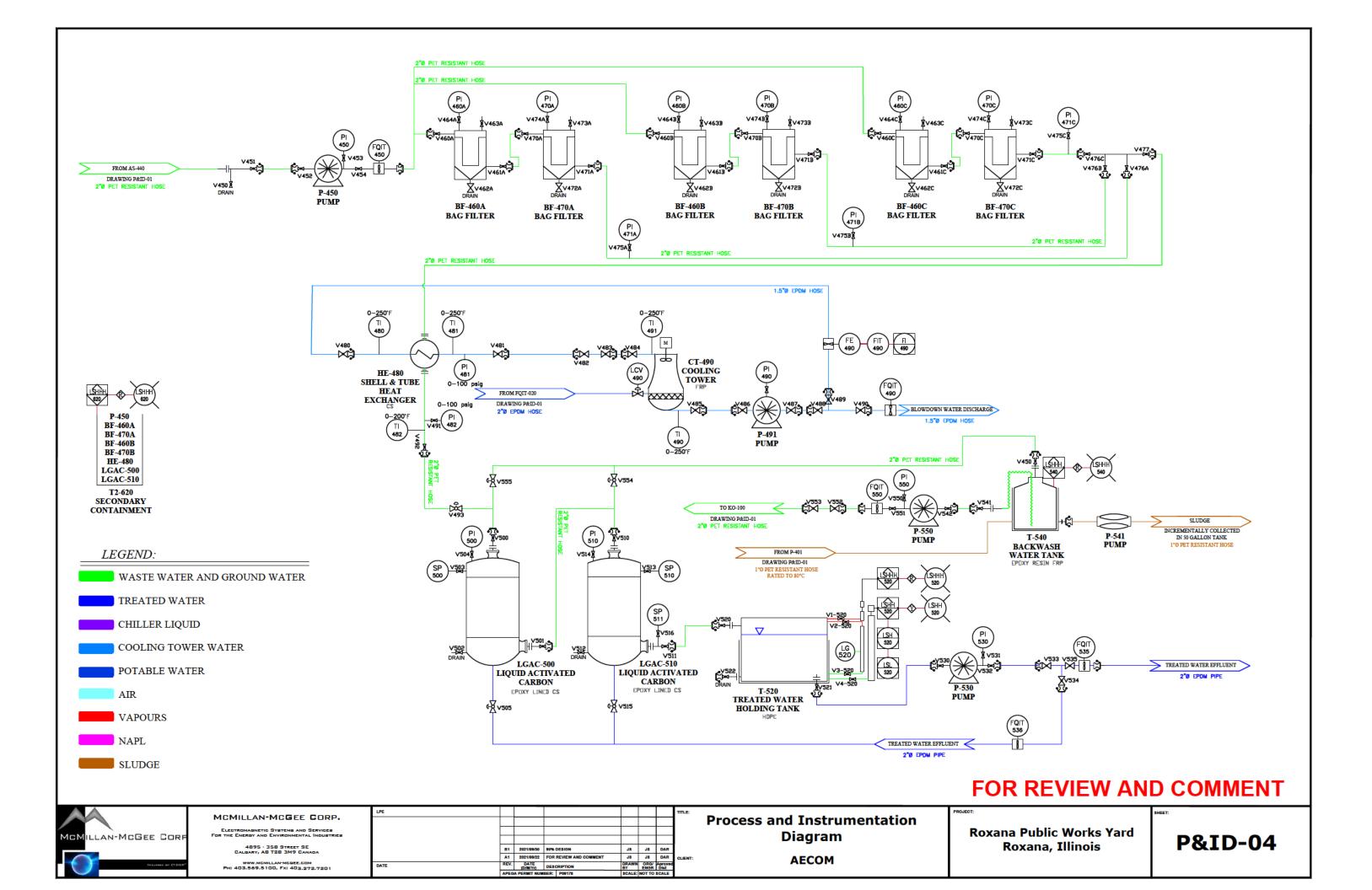
# **ET-DSP™ Well Head Details**

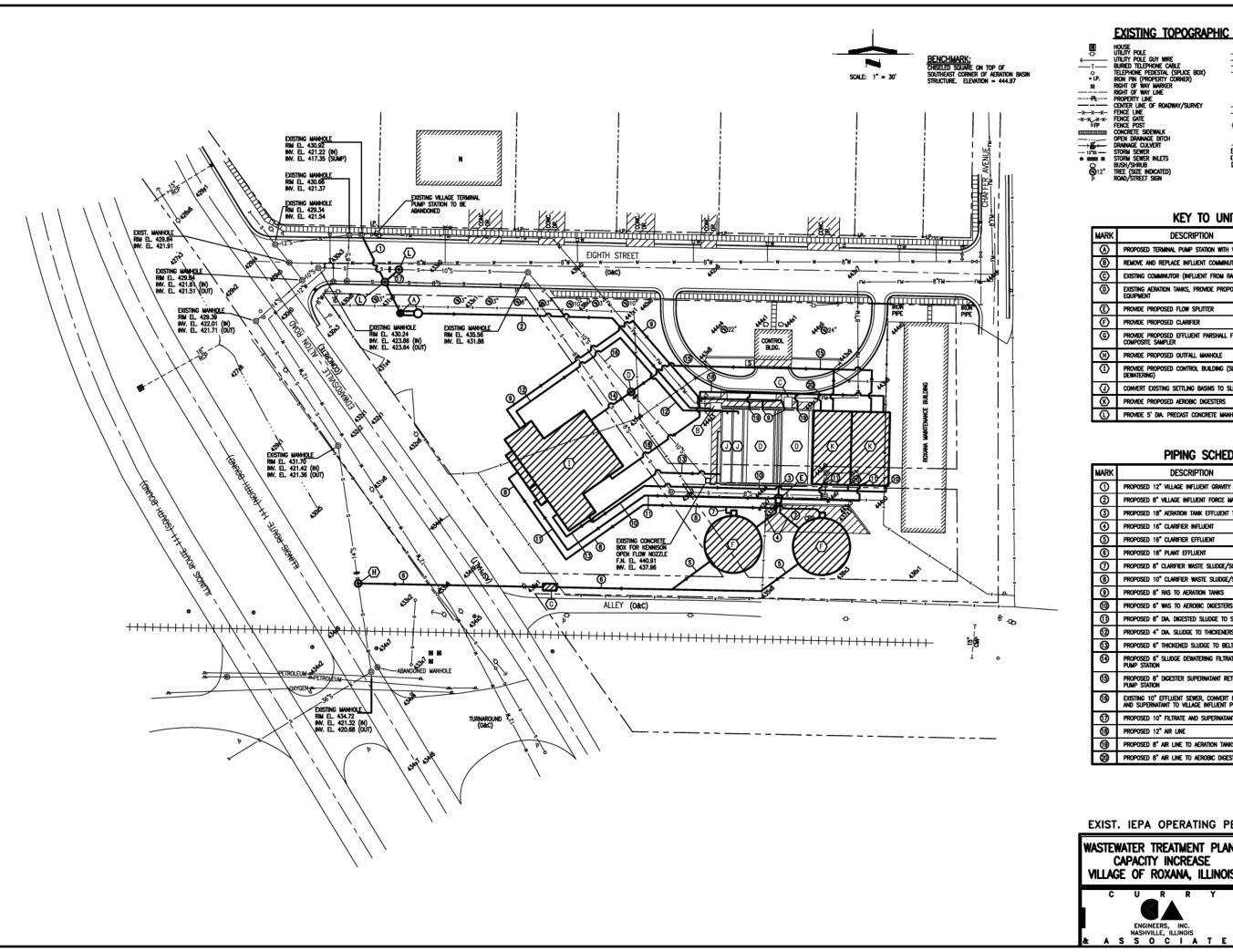
**AECOM** 

Roxana Public Works Yard Roxana, Illinois

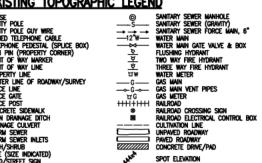
**WHD-01** 







### **EXISTING TOPOGRAPHIC LEGEND**



#### **KEY TO UNITS**

MARK	DESCRIPTION
8	PROPOSED TERMINAL PUMP STATION WITH VALVE VAULT
⊕	REMOVE AND REPLACE INFLUENT COMMINUTOR
0	EXISTING COMMINUTOR (INFLUENT FROM RAIFORT INDUSTRIAL PARK)
0	EXISTING AERATION TANKS, PROVIDE PROPOSED DIFFUSED AERATION EQUIPMENT
(E)	PROVIDE PROPOSED FLOW SPLITTER
3	PROVIDE PROPOSED CLARIFIER
0	PROVIDE PROPOSED EFFLUENT PARSHALL FLUME WITH AUTOMATIC COMPOSITE SAMPLER
€	PROVIDE PROPOSED OUTFALL MANHOLE
①	PROVIDE PROPOSED CONTROL BUILDING (SLUDGE PUMPS, BLOWERS, SLUDGE DEWATERING)
0	CONVERT EXISTING SETTLING BASINS TO SLUDGE STORAGE/THICKENING
(K)	PROVIDE PROPOSED AEROBIC DIGESTERS
0	PROVIDE 5' DIA. PRECAST CONCRETE MANHOLE

#### PIPING SCHEDULE

MARK	DESCRIPTION
0	PROPOSED 12" VILLAGE INFLUENT GRAVITY SEWER
2	PROPOSED 8" VILLAGE INFLUENT FORCE MAIN
3	PROPOSED 18" AERATION TANK EFFLUENT TO CLARIFIERS
•	PROPOSED 16" CLARIFIER INFLUENT
(5)	PROPOSED 16" CLARIFIER EFFLUENT
6	PROPOSED 18" PLANT EFFLUENT
0	PROPOSED 8" CLARIFIER WASTE SLUDGE/SCUM/DRAIN TO SLUDGE PUMPS
8	PROPOSED 10" CLARIFIER WASTE SLUDGE/SCUM/DRAIN TO SLUDGE PUMPS
9	Proposed 8" ras to aeration tanks
(9)	PROPOSED 6" WAS TO AEROBIC DIGESTERS
(	PROPOSED 8" DIA. DIGESTED SLUDGE TO SLUDGE PUMPS
@	PROPOSED 4" DIA. SLUDGE TO THICKENERS
(3)	PROPOSED 6" THICKENED SLUDGE TO BELT FILTER PRESS FEED PUMP
13	PROPOSED 6" SLUDGE DEWATERING FILTRATE RETURN TO VILLAGE INFLUENT PUMP STATION
(15)	PROPOSED 8" DIGESTER SUPERNATANT RETURN TO VILLAGE INFLUENT PUMP STATION
(6)	EXISTING 10" EFFLUENT SEWER, CONVERT FOR USE TO RETURN FILTRATE AND SUPERNATANT TO VILLAGE INFLUENT PUMP STATION
Ø	PROPOSED 10" FILTRATE AND SUPERNATANT RETURN
(8)	PROPOSED 12" AIR LINE
19	PROPOSED 8" AIR LINE TO AERATION TANKS
8	PROPOSED 8" AIR LINE TO AEROBIC DIGESTERS

EXIST. IEPA OPERATING PERMIT 1999-AO-2879

