



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-524-3301

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 22 2024

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Shell Oil Products US
Attn: Leroy Bealer
128 East Center Street
Nazareth, PA 18064

1191150002 – Madison County
Equilon Enterprises LLC dba Shell Oil Products US
ILD080012305
Log No. B-43R-CA-116, CA-117
RCRA Permit
Permit Approval

Mr. Leroy Bealer:

This letter is in response to the following submittals prepared and submitted to the Illinois EPA by Wendy Pennington, P.E. of AECOM on behalf of Shell Oil Products US (SOPUS), regarding corrective action activities at the Public Works Yard (PWY) in the Village of Roxana. These documents were submitted to the Illinois EPA to address certain aspects of the corrective action requirements of the RCRA Post-Closure Permit for the above-referenced facility (Log No. B-43R):

1. A document titled "Former Public Works Yard Steam Enhanced Extraction – Response to 1/26/2024 IEPA Letter Roxana, Illinois", dated February 23, 2024, and received by the Illinois EPA on February 26, 2024 (Log No. B-43R-CA-116). This letter was submitted as a response to the Illinois EPA's letter dated January 26, 2024.
2. A document titled "Former Public Works Yard Steam Enhanced Extraction – Pre-SEE Additional Sampling Results", dated March 04, 2024, and received on March 05, 2024 (Log No. B-43R-CA-117). This letter was submitted to satisfy the information required by the Illinois EPA's letters dated May 5, 2023 and August 22, 2022 letter.

The contamination present within the Village of Roxana, Illinois, is required to be addressed in accordance with the corrective action section of the facility's aforementioned RCRA Permit. As part of the remediation efforts conducted within the Village, a Soil Vapor Extraction (SVE) system has been installed and operated to reduce subsurface vapors originating from elevated concentrations of benzene and other volatile organic compounds (VOCs).

These VOCs are present in groundwater and soil at the PWY, and in-situ thermal remediation (ISTR), specifically steam enhanced extraction (SEE), is being implemented to reduce and remediate benzene and other VOCs in the targeted treatment zone (TTZ) at the PWY. The

Illinois EPA approved the facility's initial proposal for SEE in 2022. The subject submittal is in response to the Illinois EPA's letter dated January 26, 2024 regarding SEE activities at the PWY in the Village of Roxana.

The Illinois EPA has reviewed the subject submittal and hereby approves the submittal subject to the following conditions and modifications:

1. The Illinois EPA acknowledges SOPUS's response to Condition 3 of the Illinois EPA's January 26, 2024, letter, and the condition is modified as follows.
 - a. Due to the 30% audit accuracy of the TO-15 analytical method, the Illinois EPA acknowledges the impracticality of the 10% change in chloroform concentration to trigger a system adjustment. However, the 30% audit accuracy is the maximum allowable criteria for a system to qualify under compendium method TO-15. It is the Illinois EPA's understanding that Steam Vapor Monitoring Points (SVPs) are beyond the thermal influence of the SEE system and within the capture radius of the Multi-Phase Extraction (MPE) wells, chloroform concentrations should not be increasing significantly.

Therefore, it is the Illinois EPA's belief that the 25% replicate precision value, one of the criteria for compendium method TO-15 must be the trigger to system adjustments.
 - b. An additional SVP north of SVP-14 is not required at this time.
 - c. Decrease in chloroform concentration will not trigger a system adjustment granted SOPUS is able to demonstrate the migration of chloroform is southward toward the MPE wells in the required monthly CMP progress reports. Failing to make a such demonstration in the case of a decrease in chloroform concentration, may require further evaluation and system adjustments.
2. The evaluation of vertical delineation at MW-4 and MW-25 must be provided when reporting confirmation sampling for the SEE system, including proposed next steps. This work must include, but not be limited to, sampling at the interval consistent with 60 ft below ground surface (bgs) at MW-4, MW-25, and SVP-07/PD-03, based on data provided in the March 4, 2024 submittal (Log No. B-43R-CA-117).
3. With regards to groundwater, the proposal to submit a workplan for Illinois EPA review and approval within 180 days to propose further investigation of the southern extent of Area C with regards to kerosene and Diesel Range Organics (DRO) is acceptable.
4. Corrective action efforts at this facility must eventually adequately address all contamination at this site as required in Section V of the facility's permit.
5. All wastes generated as part of this project must be managed in accordance with the

requirements of 35 Illinois Administrative Code (IAC) Parts 721, 722, 723, 728, 808 and 809.

6. Except as modified herein, RCRA corrective action activities at this facility must be carried out in accordance with: (1) 35 IAC Parts 724 and 742; (2) the facility's RCRA Permit; and (3) Illinois EPA letters regarding such activities.
7. Under the provisions of 29 CFR 1910, cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination, and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of forty (40) hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

This action shall constitute Illinois EPA's final action on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Illinois Environmental Protection Act by filing a petition for a hearing within thirty-five (35) days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed ninety (90) days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782 5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk
State of Illinois Center
100 West Randolph Street, Suite 11 500
Chicago, IL 60601
312/814 3620

1191150002 – Equilon Enterprises LLC dba Shell Oil Products US

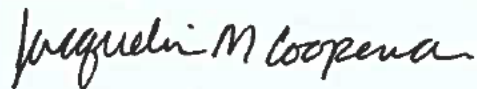
Log No: B-43R-CA-116, CA-117

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Work required by this letter, the 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. 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.

Any questions regarding this letter, please feel free to contact Amy Butler, P.G. at (217) 558-4716 for specific questions related to groundwater issues. All other questions regarding this letter should be referred to Visal Sovis at (217) 558-4717.

Sincerely,



Jacqueline M. Cooperider, P.E.

Permit Section Manager

Bureau of Land

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VP AMB JMC TNH

Cc: Wendy Pennington (electronic copy only)