



# Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

## 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 Equilon Enterprises LLC d/b/a/ SOPUS County Madison  
 Street Address 900 South Central Ave Site No. (IEPA) 1191150002  
 City Roxana Site No. (USEPA) ILD080 012 305

### 2.0 Owner Information

Name Not Applicable  
 Mail Address \_\_\_\_\_  
 City \_\_\_\_\_  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 Contact Name \_\_\_\_\_  
 Contact Title \_\_\_\_\_  
 Phone \_\_\_\_\_

### 3.0 Operator Information

Name Equilon Enterprises LLC d/b/a/ SOPUS  
 Mail Address 128 East Center Street  
 City Nazareth  
 State PA Zip Code 18064  
 Contact Name Leroy Bealer  
 Contact Title Senior Program Manager  
 Phone 484-632-7955

### 4.0 Type of Submission (check applicable item and provide requested information, as applicable)

RFI Phase I Workplan/Report IEPA Permit Log No. B-43R  
 RFI Phase II Workplan/Report Date of Last IEPA Letter on Project August 22, 2022  
 CMP Report; Log No. of Last IEPA Letter on Project B-43R-CA-107  
 Other (describe): Standard Operating Procedures Does this submittal include groundwater information:  Yes  No  
 Date of Submittal April 27, 2023

### 5.0 Description of Submittal: (briefly describe what is being submitted and its purpose)

Retraction request for previously submitted standard operating procedures submitted to IEPA.

### 6.0 Documents Submitted (identify all documents in submittal, including cover letter; give dates of all documents)

Retraction of November 30, 2022 Routine Updates to Drilling-related SOPs letter and RCRA Corrective Action Certification. Copy of submittal also sent directly to Amy Butler, Visal Poornake and Ali Al-Janabi of IEPA.

For: Retraction of 11/30/2022 Routine SOP Updates

Date of Submission: April 27, 2022

**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.

**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: \_\_\_\_\_ Date: 4/26/2023  
 Title: Senior Program Manager

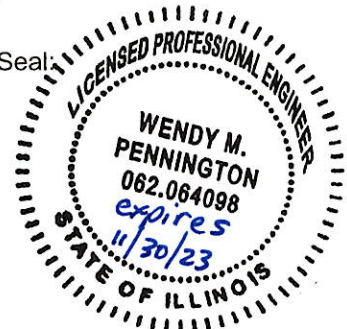
**7.2 Professional Certification (if necessary)**

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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44 (h))

Professional's Signature: Wendy Pennington Date: 4/27/2023  
 Professional's Name Wendy Pennington  
 Address 100 N. Broadway, 20th Floor  
 City St. Louis  
 State MO Zip Code 63102  
 Phone 314-452-8929

Professional's Seal:



For: Retraction of 11/30/2022 Routine SOP Updates

Date of Submission: April 27, 2022

**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 NOT APPLICABLE

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Laboratory Responsible Officer

Mailing Address of Laboratory

Address \_\_\_\_\_

City \_\_\_\_\_

\_\_\_\_\_  
Name and Title of Laboratory Responsible Officer

State \_\_\_\_\_ Zip Code \_\_\_\_\_



April 27, 2023

Ms. Jacqueline Cooperider, PE  
Manager, Permit Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Bureau of Land  
1021 North Grand Avenue East  
Springfield, Illinois 62794

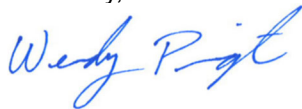
**Retraction of November 30, 2022 Routine Updates to Drilling-Related Standard Operating Procedures Submittal**  
**Equilon Enterprises LLC dba Shell Oil Products US**  
**Roxana, Illinois**  
**1191150002 - Madison County (ILD080012305)**  
**Log B-43R-CA-110**

Dear Ms. Cooperider:

As part of AECOM Technical Services, Inc.'s (AECOM's) quality improvement process, Standard Operating Procedures (SOPs) used by field staff performing activities at the Investigation Site in Roxana, Illinois are routinely reviewed. Currently, a March 13, 2023, approval with conditions for SOPs letter from IEPA is also under review with a response being prepared. The SOPs that were submitted to IEPA in the *Routine Updates to Drilling-related Standard Operating Procedures* submittal dated November 30, 2022, contained several SOPs which were updated only from an editorial and formatting perspective. The March 13, 2023, IEPA letter did not include SOPs from the November 30, 2022, submittal. It is requested that the November 30, 2022, submittal be retracted as no substantive changes were made to the SOPs in that submittal.

If you have any questions, please contact Wendy Pennington at [wendy.pennington@aecom.com](mailto:wendy.pennington@aecom.com) (314-452-8929). Copies of this submittal are being electronically sent separately directly to Amy Butler (IEPA, Springfield) and Ali Al-Janabi (IEPA, Collinsville).

Sincerely,



Wendy Pennington, PE  
Project Manager, AECOM



Samuel Fisher, CHMM  
Environmental Scientist, AECOM

**encl:** RCRA Corrective Action Certification Form

**cc:** Amy Butler (IEPA - Springfield, IL)  
Ali Al-Janabi (IEPA - Collinsville, IL)  
Leroy Bealer (Shell)  
Tom Morgan (Phillips 66)  
Greg Mollett (Greensfelder)  
Project File  
Repositories (Roxana Public Library, website)