



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1191150002 USEPA ID Number: ILD080012305

Site Name: Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell)

Physical Site Location (street, road, etc.): 900 South Central Avenue

City: Roxana Zip Code: 63084 County: Madison

Existing RCRA Permit (if applicable): B-43R

II. Owner/Operator Identification

Owner Information

Name: WRB Refining LP

Mailing Address:

2331 City West Blvd
Houston, TX 77042

Contact Name: Tom Morgan

Phone #: 618-255-2142

Email: thomas.r.morgan@p66.com

Operator Information

Name: Equilon Enterprises LLC d/b/a Shell

Mailing Address:

128 East Center Street
Nazareth, PA 18064

Contact Name: Leroy Bealer

Phone #: 484-632-7955

Email: leroy.bealer@shell.com

A 39(i) certification must be submitted with information concerning the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each employee or officer of the owner or operator who signed the permit application or has managerial authority at the site; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Treatment
- Disposal
- Incineration
- Groundwater
- Corrective Action
- UIC Class I
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Permit Modification to remove water production well with compromised integrity from the Permit (B-43R).

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Ray Rigdon

Owner Signature: *Ray M* Date: 8/4/2023

Title: Vice President - Wood River Refinery

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 4th day of August 2023.

Notary Signature: *Merideth A. Wilson*

My commission expires on: 8/22/2026



Operator

I certify under penalty of law that this document and all attachment 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 that 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.

Operator Name (Printed or Typed): Leroy Bealer

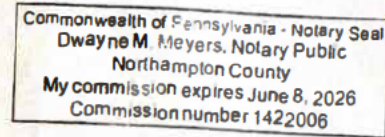
Operator Signature: [Signature]

Date: 7/31/2023

Title: Senior Program Manager

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 31st day of July 2023.



Notary Signature: Dwayne M. Meyers

My commission expires on: 8 JUNE 2024

Notary Seal

Engineer

I certify under penalty of law that this document and all attachment 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 that 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.

Engineer Name (Print or Type): Wendy Pennington

Engineer Signature: [Signature]

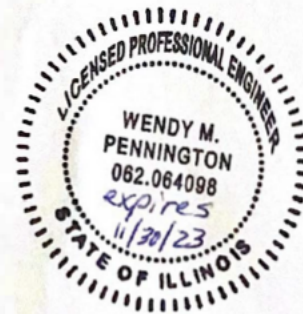
Illinois License No.: 062.064098

Expiration Date of License: Nov 30, 2023

Engineer Phone No. 314-452-8929

Email: wendy.pennington@aecom.com

Engineer Address:
100 North Broadway, 20th Floor
St. Louis, MO 63102



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

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))

Instructions for RCRA Permit Application Form LPC-PA23

The following instructions are designed to aid in the completion of the RCRA Permit Application Form LPCPA23. If you have additional questions regarding the form, or the informational requirements, please contact the Illinois EPA Bureau of Land (BOL) Permit Section at 217-524-3300.

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. If an application has already been submitted to the Agency, a completed RCRA Permit Application Form must accompany all additional information that is submitted to the agency for that application. An example of "additional information" would be a response to verbal or written comments from the Agency. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

I. Site Identification

Enter all of the required information in the space provided. If you do not have an Illinois or USEPA identification number, call the Illinois EPA BOL Waste Reduction and Compliance Section at 217-785-8604 to obtain these numbers prior to completing the form.

II. Owner/Operator Identification

The terms "owner" and "operator" are defined at 35 IAC 720.110 and 702.110. If the facility has the same owner and operator, you may type in "same" under operator information. Also, if the contact person for an application is different from the owner or operator (i.e. the consultant), please indicate this in the cover letter for the application.

III. Permit Application Identification

Indicate both the type of application and the kind of waste management involved. For instance, if the application involves more than one type of waste management, check all applicable options.

IV. Signatures

The signatory requirements for permit applicants are identified at 35 IAC 702.126 and 702.151. If the facility has the same owner and operator, you may type in "same" under operator information.

Notary Public: A notary public's signature and stamp are required for both the owner and operator signatures on the form.

Engineer Certification: A professional engineer that is licensed in the State of Illinois must certify all technical information provided in a permit application. 35 IAC 703.182 describes the types of information that must be certified by a professional engineer.

August 11, 2023

Ms. Jacqueline M. Cooperider, PE
Manager, Permit Section
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, IL 62702

Class 1* Permit Modification – Further Discussion of W-85 Notification Timeline; W-85 Removal; Proposal for New Well (W-92)

**Equilon Enterprises LLC d/b/a Shell Oil Products US
WRB Refining LP Wood River Refinery
Roxana, Illinois
1191150002 - Madison County (ILD080012305)
Log No. B-43R**

Dear Ms. Cooperider,

AECOM Technical Services, Inc. (AECOM), on behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell), is submitting this Class 1* Permit Modification in accordance with Condition IV(K)(2) of Shell's RCRA Post-Closure Permit, issued September 23, 2010, and most recently modified October 31, 2022.

Further Discussion on W-85 Notification Timeline

Water production well W-85 was taken offline on March 9, 2023, for routine cleaning and maintenance. After the well shutdown, a precleaning inspection was performed by Phillips 66 personnel/well drilling subcontractor (crews). This inspection led to the discovery of sand having accumulated within the well pipe. This has been seen at other water production wells before and is typically managed by removal of the accumulated sediment followed by sleeving the well (installing a slightly smaller diameter casing within the existing well casing to seal off and prevent sediment from accumulating again) and performing a downhole camera inspection. Phillips 66 crews attempted to remove the accumulated sand on March 15, 2023, at which time a sinkhole opened immediately next to the W-85 well pipe at the surface. A worker fell and was injured when the sinkhole opened; therefore, a "stop-work" was issued. Several discussions and evaluations took place to address the following items:

- Investigate the incident that occurred.
- How to fill in the sinkhole and stabilize the ground.
- How to perform the sediment removal, sleeving and camera inspection of W-85 safely.

On June 1, 2023, Shell was notified by Phillips 66 that the ground had successfully been stabilized and the sediment removal, sleeving and camera inspection were ready to be completed. Sleeving was successfully completed on June 8, 2023, and the downhole camera inspection was performed on June 12, 2023. On June 19, 2023, the video from the camera inspection was shared by Phillips 66 with Shell and AECOM. This video showed that the screen of W-85 was cracked and out of round in several places.

It was during a meeting on June 19, 2023, that Shell and Phillips 66 determined that water production well W-85 was damaged and that a repair was not likely to be successful, as was originally planned. With this determination being made, Shell and Phillips 66 considered June 19, 2023, to be the date that initiated the 30-day notification requirement in Condition IV(D)(4) of the Permit. The *Notice of Water Production Well W-85 Damage* was submitted to IEPA on July 6, 2023.

Removal of Water Production Well W-85 from the Permit

This modification is requesting removal of water production well W-85, designated in the Permit for gradient control, as it is no longer able to serve its intended purpose. A notification of the condition of well W-85 was submitted to Illinois Environmental Protection Agency (IEPA) on July 6, 2023. This water production well was plugged and abandoned on July 21, 2023, due to the compromised integrity of the screen of this well. Enclosed is a copy of the Water Well Sealing Form associated with water production well W-85.

New Water Production Well Proposal

A location for installation of a replacement water production well has been selected and is roughly due east of the original W-85 water production well location (see image below). This is the closest physical location that was deemed safe due to the vicinity of overhead power lines and other surficial features in conjunction with subsurface infrastructure. Water Well W-85 was located immediately west of the berm surrounding a tank yard. The new well location selected is approximately 60 feet to the east of W-85, on the other side of the berm surrounding the neighboring tank yard. The image below is a snapshot from some preliminary modeling work and depicts the groundwater contours modeled with the removal of W-85 and assuming the new well location with construction and pumping similar to that of W-85.



Coordination with the drilling subcontractor is currently in progress, and the replacement water production well (W-92) will be installed in general accordance with the requirements of the Permit and similar to Water Production Well W-85. In accordance with Condition IV(D)(6) of the Permit, the boring log and water well construction report for the replacement water production well will be submitted as a Class 1* Permit Modification Request once installation is completed.

The cost estimate for a replacement water production well is summarized below:

Layne Water Well Installation	\$370,000
Well Pump, Motor, etc. Supplies	\$35,000
Surveying Well Location	\$2,000
Labor and Part B Permit Support	\$1,500
Grand Total =	\$408,500

If you have any questions concerning this submittal, please contact Leroy Bealer, SOPUS Principal Program Manager, at 484-632-7955 or leroy.bealer@shell.com, or Wendy Pennington (AECOM) at 314-452-8929 or wendy.pennington@aecom.com.

Sincerely,



Wendy Pennington, PE
Project Manager
AECOM

Enclosures: RCRA Permit Application Form (LPC-PA23)
39(i) Certification
Water Well Sealing Form

cc: Leroy Bealer, SOPUS
Thomas Morgan, Phillips 66
Amy Butler, IEPA, Springfield
Ali Al-Janabi, IEPA Collinsville
Repository (Roxana Public Library)
Project File



WATER WELL SEALING FORM

RETURN ALL COPIES TO IDPH OR
LOCAL HEALTH DEPARTMENT

PDF FILLABLE/SAVABLE

This form shall be submitted to this Department or the local health department not more than 30 days after a water well, boring or monitoring well is sealed. Such wells are to be sealed not more than 30 days after they are abandoned in accordance with the sealing requirements in the Illinois Water Well Construction Code. THE LOCAL HEALTH DEPARTMENT OR REGIONAL PUBLIC HEALTH DEPARTMENT MUST BE NOTIFIED AT LEAST 48 HOURS PRIOR TO SEALING.

1. Ownership (Name of Controlling Party) Phillips 66

2. Well Location: Well Site Address 900 Central Ave City Roxana Zip 62084

Lot # Land I.D.# County Madison Township 5N

Range 9W Section 35 Quarter of the SW Quarter of the NW Quarter of the NW

GPS: North Degrees 38 Minutes 50 Seconds 41N West Degrees 90 Minutes 04 Seconds 34W

Report decimal minutes to minutes and seconds by multiplying the decimal part of the minutes by 60, e.g. latitude 38 degrees 46.07 minutes N would be latitude 38 degrees 46 minutes 4.2 seconds (0.07 x 60 = 4.1) N. Report GPS coordinates to the nearest 0.1 second.

3. Year Drilled 2010 4. Drilling Permit Number (and date, if known) 119-02-10

5. Type of Well Drilled 6. Total Depth (ft.) 104 Diameter (in.) 24

7. Formation clear of obstruction yes

8. Detains of Plugging (bentonite, neat cement or other materials)

Filled with	<u>Pea Gravel</u>	From (ft.)	<u>104</u>	to (ft.)	<u>27</u>
Kind of plug	<u>Bentonite Chips</u>	From (ft.)	<u>27</u>	to (ft.)	<u>25</u>
Filled with	<u>Cement</u>	From (ft.)	<u>25</u>	to (ft.)	<u>3</u>
Kind of plug	<u> </u>	From (ft.)	<u> </u>	to (ft.)	<u> </u>
Filled with	<u> </u>	From (ft.)	<u> </u>	to (ft.)	<u> </u>
Kind of plug	<u> </u>	From (ft.)	<u> </u>	to (ft.)	<u> </u>

9. CASING RECORD Upper 2 feet of casing removed NO 10. Date well was sealed 7-21-23

11. Licensed water well driller or other person approved by the Department performing well sealing

Name Brian Swelton Complete License Number 102-004269

Address 2399 Caesars Dr City Fenton State Mo Zip Code 63076

This state agency is requesting disclosure of information that is necessary to accomplish the statutory purpose as outlined under Public Act-0863. Disclosure of this information is mandatory. This form has been approved by the Forms Management Center. IL 482-0631

Questions regarding the completion of this form should be directed to the local health department or the Illinois Department of Public Health 217-782-5830, TTY (for hearing impaired only) 800-547-0466.

Seal Permit # 119-078-23



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
Division of Land Pollution Control - #33
39(i) Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

I. Applicant Information

Hauling Company: Equilon Enterprises LLC d/b/a Shell Oil Products US IEPA BOL No.: 1191150002
Address: 900 South Central Ave
City: Roxana State: IL Zip Code: 62084
Permit Numbers (if applicable): B-43R

Owner

Owner Name: WRB Refining LP
Street Address: 2331 City West Blvd
City: Houston State: TX Zip: 77042

Operator

Operator Name: Equilon Enterprises LLC dba SOPUS
Street Address: 128 East Center St
City: Nazareth State: PA Zip: 18064

Is this 39(i) certification for the owner or the operator?

Owner Operator Owner and operator are the same entity

II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
William E. Platt	Global Manager Environmental Projects
Leroy Bealer	Principal Program Manager

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Wendy Pennington	AECOM, Project Manager

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

RCRA Post-Closure Permit Renewal Application; EPA ID No ILD 080012305; Log No. B-43R2

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

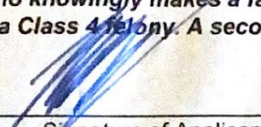
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

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))



Signature of Applicant Officer

7/31/2023

Date

Leroy Bealer

Printed Name

Senior Program Manager

Title

Attachment A (1 of 1)

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: _____ Title: _____

Status: Owner Operator Officer Employee (check all that apply)

A. Prior Findings or Convictions

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.

B. Pending Proceedings

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? Yes No
2. The reversal of a conviction or finding described in subsection A, above? Yes No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.



Illinois Environmental Protection Agency

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39(i) Certification for Operating a Waste Management Facility

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This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
Division of Land Pollution Control - #33
39(i) Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

I. Applicant Information

Hauling Company: Equilon Enterprises LLC d/b/a Shell Oil Products US IEPA BOL No.: 1191150002
Address: 900 South Central Ave
City: Roxana State: IL Zip Code: 62084
Permit Numbers (if applicable): B-43R

Owner

Owner Name: WRB Refining LP
Street Address: 2331 City West Blvd
City: Houston State: TX Zip: 77042

Operator

Operator Name: Equilon Enterprises LLC dba SOPUS
Street Address: 128 East Center St
City: Nazareth State: PA Zip: 18064

Is this 39(i) certification for the owner or the operator?

Owner Operator Owner and operator are the same entity

II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Ray Rigdon	Refinery Manager

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Thomas Morgan	Environmental Director

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

RCRA Post-Closure Permit Renewal Application; EPA ID No ILD 080012305; Log No. B-43R2

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

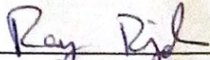
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

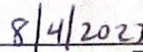
Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

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))



Signature of Applicant Officer



Date

Ray Rigdon

Printed Name

Vice President - Wood River Refinery

Title

Attachment A (1 of 1)

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: _____ Title: _____

Status: Owner Operator Officer Employee (check all that apply)

A. Prior Findings or Convictions

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.

B. Pending Proceedings

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? Yes
 No
2. The reversal of a conviction or finding described in subsection A, above? Yes
 No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.