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February 5, 2020

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**Subject: Notification of Class 1* Permit Modifications
Equilon Enterprises LLC d/b/a Shell Oil Products US
WRB Refining LLC, Wood River Refinery, Roxana, Illinois
119115002 – MadisonCounty**

Dear [mailing list name]:

On behalf of Equilon Enterprises LLC d/b/a Shell Oil Products US (SOPUS), AECOM is submitting this notification of Class 1* Permit modifications to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) as required by 35 Ill. Adm. Code 703.281(a)(2). The following Class 1* Permit modifications have been approved with conditions and modifications by the Illinois Environmental Protection Agency (IEPA) and the information incorporated into a revised Permit, dated December 20, 2019.

1. *Sampling and Analysis Plan Revision*, dated February 11, 2015 was provided in response to Condition IV.H.6 of the Permit and requests to replace two pages of Section C text and provides a new Attachment C-4 to the Approved Permit Application.
2. *Clarification Information to Supplement the 8/23/13 Request to Discontinue Southwest Tank Farm Sampling Activities*, dated September 23, 2015 clarifying that groundwater monitoring sampling results for wells at the Southwest Tank Farm were reported to IEPA within semi-annual reports as of the renewed Permit dated 9/23/10, instead of being sent to the USEPA.
3. *Monitoring Well P-84A Integrity Assessment*, dated September 25, 2015 requested to correct and update well construction details contained in the table in Condition IV.D.1 of the Permit.
4. *Update of Groundwater Protection Standards*, dated September 24, 2015 provided updated Groundwater Protection Standards to reflect revisions to 35 IAC 620, as required by Condition IV.E.5 of the Permit.
5. *Groundwater Monitoring Well Construction Information Update*, dated October 23, 2015 requested revisions to Conditions IV.1.a and 1.b of the Permit, including (a) construction information updates for replacement of monitoring well P-114 with P-114R; (b) minor typographical errors in the previous Permit Modification; and (c) additional of newly obtained boring logs/monitoring well installation details previously thought unavailable provided to AECOM by Phillips 66 (P66).
6. *West Fenceline Groundwater Monitoring Well Sampling Methods*, dated October 23, 2015 clarifies low-flow sampling methods are used on groundwater monitoring wells required to be sampled by both the Roxana Interim Groundwater Monitoring Program and the WRR Groundwater Corrective Action Program.

7. *Groundwater Pumping Well W-87 to Replace W-42*, dated April 24, 2017 requested existing water production well W-87 serve as a replacement for W-42 and provided the well construction details for W-87.
8. *Updated Permit Renewal Application Table C-15 for Laboratory Provided Containers*, dated April 21, 2017 provided revised pages to the Permit Application to reflect the current sample container used by the laboratory.
9. *Class 1* Permit Modification- Section C Revision for SOP Reference*, dated January 29, 2018 provided revised pages to the Permit Application reflecting revisions to Sections C.7.5 and C.8.4.3 to reference standard operating procedures, made in response to the IEPA letter dated 10/10/17.

The Permit was updated to address the above modification requests, based on IEPA's decisions on the requested items. The modified Permit, issued December 19, 2019, replaces the Permit previously issued by the IEPA on July 29, 2015. The revised Permit is on file with the repository located at the Roxana Public Library.

If you have any questions concerning this information, please contact Dan Kirk, SOPUS Principal Program Manager, at dan.kirk@shell.com (218-544-9796), or Bob Billman at bob.billman@aecom.com (314-802-1122).

Sincerely,



Wendy Pennington, PE
Project Engineer



Robert B. Billman
Senior Project Manager

cc: Repository (Roxana Public Library)
Project File