



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

217/524-3300

February 14, 2012

CERTIFIED MAIL

7009 3410 0002 3749 5475

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Shell Oil Products US  
Attn: Mr. Kevin Dyer  
17 Junction Drive  
PMB #399  
Glen Carbon, Illinois 62034

WRB Refining LLC Wood River Refinery  
Attn: Mr. Mike Bechtol  
900 South Central Avenue  
P.O. Box 76  
Roxana, Illinois 62084

Re: 1191150002 -- Madison County  
Equilon  
ILD080012305  
Log No. B-43R-CA-26 and 29  
Received: October 14, 2011; November 29, 2011  
RCRA Permit  
Permit CA

Dear Mr. Dyer and Mr. Bechtol:

This is in response to the two (2) documents entitled, "Interim Groundwater Monitoring Program – 3<sup>rd</sup> Quarter 2011"; and "Groundwater Monitoring Revised Figures – 1<sup>st</sup> & 2<sup>nd</sup> Quarter 2011". The documents were submitted on behalf of Shell Oil Products US (SOPUS) by URS Corporation (URS), with regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois. The submittals were prepared to satisfy quarterly reporting requirements associated with corrective action requirements for contamination present within the Village of Roxana, and an established Interim Groundwater Monitoring Network. The documents were reviewed as corrective action modification requests to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

The Illinois EPA has determined that subject submittals can be approved, with the following conditions and modifications:

1. The Illinois EPA approves the revised Figures 3 and 5 through 8 for the First and Second Quarters 2011. The facility must submit revised figures for the Fourth Quarter 2010 to satisfy outstanding deficiencies and satisfy Condition 5 of the June 16, 2011 letter. The figures must be submitted within ninety (90) days for Illinois EPA review and approval.
2. Errors identified within the historical electronic reporting of groundwater data for WRR wells, which includes some wells within the interim network, must be resubmitted. In addition, these reports must be provided separately from the routine groundwater reports.

The facility must continue to work with the Illinois EPA, as necessary, to correct electronic reporting errors for the WRR.

3. The facility must continue to pursue access for additional groundwater investigation beyond well GP-5 to further delineate the dissolved plume, as required by Condition 6.a(3) of the August 5, 2010 Illinois EPA letter (Log Nos. B-43-CA-16 and CA-18).
4. RCRA corrective action activities carried out at the facility including off-site activities as necessary, must meet the requirements of: (1) 35 Ill. Admin. Code 724.201; (2) the facility's Permit; and (3) Illinois EPA letters regarding such activities.

This letter shall constitute Illinois EPA's final decision on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 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 90 days by written notice from the applicant and the Illinois EPA within the 35-day initial 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:

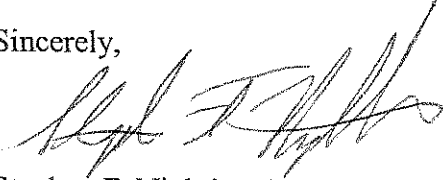
Illinois Pollution Control Board, Clerk  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
312/814-3620

Work required by this letter, your modification requests 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.

If you have any questions regarding the groundwater aspects of this letter, please contact Amy Boley at 217/558-4716; questions regarding other aspects of this letter should be directed to James K. Moore, P.E. at 217/524-3295.

Sincerely,



Stephen F. Nightingale, P.E.  
Manager, Permit Section  
Bureau of Land

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cc: <sup>AMB TBM JCM</sup> Robert Billman, URS  
Eric Peterson, ConocoPhillips

Bcc: Bureau File  
Collinsville Region  
DLC - Melanie Jarvis  
Terri Myers  
Jim Moore  
Amy Boley  
Mara McGinnis