



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/524-3300

January 3, 2013

CERTIFIED MAIL

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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 DBA Shell Oil Products  
ILD080012305  
Log No. B-43R-CA-39  
Received: June 14, 2012  
RCRA Permit  
Permit CA

Dear Mr. Dyer and Mr. Bechtol:

This is in response to the document submitted to satisfy Condition 2.b.iv of the March 14, 2012 letter (Log No. B-43R-CA-25). The document was 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 submittal is associated with corrective action requirements for delination of groundwater contamination present within the Village of Roxana, and an established Interim Groundwater Monitoring Network. The document was reviewed as a corrective action modification request to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

1. The Illinois EPA can approve the one-inch well proposed as profiling location GWP-25 on Figure 1 of the subject submittal. The described reporting of results from the profiling activities and data collection in the subject submittal dated June 12, 2012 (Log No. B-43R-CA-39) must be submitted within ninety (90) days of the date of this letter.
2. Due to SOPUS detecting product historically and within the last eight quarters at several wells in this area of concern, groundwater profiling wells must also be installed to the south, east, and west of well T-7 for delineating the extent of contamination. In addition,
  - a. Depending upon field investigation results, the facility may need to step out further from the investigation locations required by this letter. The facility is required to define the extent of groundwater contamination exceeding 35 Ill. Adm. Code, Part 620, Class I Groundwater Quality Standards. Step out locations

may be installed at approximately 500-foot increments as needed to define the extent of contamination.

- b. The profiling activities must be conducted as approved in Condition 1 above.
3. 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.

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

*AMB 10/13 JVN IBM*  
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cc: Robert Mooshegian, URS  
Eric Peterson, ConocoPhillips