



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-524-3300

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUL 11 2022

7011 1150 0001 0857 5697

Shell Oil Products US
Attn: Leroy Bealer
128 East Center Street
Nazareth, PA 18064

1191150002 – Madison County
Equilon d/b/a Shell Oil Products, US
ILD080012305
Log No. PS22-007
RCRA Permit

Mr. Leroy Bealer,

This is in response to a letter submitted by Wendy Pennington on behalf of Shell Oil Products US (SOPUS) dated February 21, 2022, and received by Illinois EPA on February 23, 2022, and additional information dated March 2, 2022, was received on March 4, 2022. The request was logged in as PS22-007. The letter is a request for a “Contained-In Determination” for contaminated groundwater that would be extracted by the steam enhanced extraction system (SEE) at the Village of Roxana Public Works Yard site located at 310 N Central Avenue in Roxana Illinois.

Soil and groundwater at the Village of Roxana Public Works Yard site is contaminated with multiple constituents of concern (COC). Benzene is the primary COC, which is considered a U-Listed hazardous waste (U019). SOPUS proposes to treat and dispose of approximately 6.8 million gallons of this contaminated groundwater as a nonhazardous waste to be discharged to a publicly owned treatment works (POTW).

PS22-007 seeks written concurrence from the Illinois EPA that the 6.8 million gallons of groundwater contaminated with Benzene can be determined to no longer contain a listed hazardous waste if the following conditions are met:

- a. The contaminated groundwater does not exhibit a characteristic of a hazardous waste as set forth in 35 IAC 721, Subpart C, and
- b. The contaminated groundwater meets the land disposal restrictions (LDRs) at 35 IAC 728, including the standards for all underlying hazardous constituents that may be present, and
- c. The concentrations of COCs in groundwater meet the pre-treatment standards for the POTW.

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9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
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2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

PS22-007 indicates that the contaminated groundwater subject to the Contained-In Determination request will not exhibit a characteristic of a hazardous waste and will meet the LDRs, including those for any underlying hazardous constituents that may be present. The Illinois EPA concurs that the contaminated groundwater may be managed as a non-hazardous special waste if the conditions a. through c. above are met provided that:

1. The treated groundwater is discharged to the POTW sewer system as proposed by SOPUS, all other applicable rules and regulations, requirements, standards and conditions set forth for conducting such activities by the POTW and the Illinois EPA Bureau of Water (or any other authority(s)) are met.
2. SOPUS must meet the Universal Treatment Standards in 728 TABLE U for any underlying hazardous constituents present in the extracted groundwater from the subject site in addition to the treatment standards for benzene.

This letter does not approve any remediation or remedial objectives for the site. Management and/or disposal of the contaminated groundwater other than as described above would result in the need to evaluate the application of the Contained-In Policy on a case-by-case basis. Under these conditions, the company should contact the Bureau of Land Permit Section directly for assistance.

The opinions expressed in this letter are limited to the above referenced facility and the conditions described in your letter. If the conditions at the site or management of the material are modified, the statements made in this letter may no longer be valid.

If you have any questions regarding this letter, please feel free to contact Visal Poornaka at (217) 558-4717.

Sincerely,



W. Robert Watson, P.E.
Manager , RCRA Unit
Division of Land Pollution Control
Bureau of Land

WRW: VP: 1191150002-RCRA-PS22-007.docx

Cc: Wendy Pennington (electronic copy only)

VP