



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR
URS CORPORATION
KEC MESSINA, ACTING DIRECTOR

217/524-3300

AUG 08 2016

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AUG 08 2016

July 27, 2016

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BY: _____

Shell Oil Products US
Attn: Mr. Kevin Dyer
17 Junction Drive
PMB #399
Glen Carbon, Illinois 62304

WRB Refining LLC
Wood River Refinery
Attn: Brian Wulf, Environmental Director
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-67
Received: August 19, 2013; January 15, 2014
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Wulf:

A technical review has been completed for the three (3) subject submittals listed below. The subject submittals were prepared and submitted on behalf of Shell Oil Products US (SOPUS) by Robert B. Billman of URS Corporation (URS). SOPUS and Phillips 66 maintain a Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the Wood River Refinery (WRR) issued on September 29, 1989. The subject submittals were reviewed as corrective action modification requests to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

Submittal No. 1 – A document entitled, “Perched Groundwater Monitoring Locations”, dated August 16, 2013, and received by the Illinois EPA August 19, 2013. The subject submittal requests to be removed and abandoned from the Interim Groundwater Monitoring Program.

Submittal No. 2 – A document entitled, “Perched Groundwater Monitoring Locations”, dated January 14, 2014, and received by the Illinois EPA January 15, 2014. The subject submittal formally states the perched wells were incorporated into the Interim Groundwater Monitoring Program beginning Second Quarter 2012 and will continue to remain in the program.

Submittal No. 3 – A document entitled, “Perched Groundwater Monitoring Locations”, dated January 14, 2014, and received by the Illinois EPA January 15, 2014. The subject submittal requests perched wells ROST-5-PZ and ROST-10-PZ be removed and abandoned from the Interim Groundwater Monitoring Program.

The subject submittals are submitted to satisfy requirements listed in Condition 8 of the Illinois EPA letter dated March 14, 2012 (Log No. B-43R-CA-25). Condition 8 required that perched groundwater be evaluated at piezometers: P-60-12S; P-60-13S; ROST-5-PZ; ROST-7-PZ; ROST-10-PZ; and ROST-21-PZ, and detailed reporting begin for the perched zone. This letter also required that ROST-5-PZ and ROST-10-PZ be included within the program for at least one (1) year prior to being considered dry. The subject submittals can be approved with the following conditions and modifications:

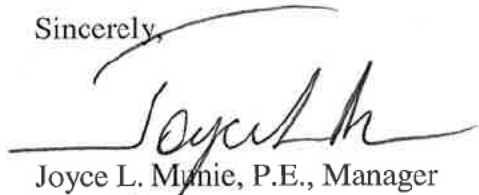
1. The Illinois EPA can approve the request to abandon the perched wells P-60-12S; P-60-13S; ROST-5-PZ; ROST-7-PZ; ROST-10-PZ; and ROST-21-PZ, and remove them from the program. This determination is based on the following conditions reported since their incorporation into the Interim Groundwater Monitoring Program in Second Quarter 2012:
 - a. ROST-5-PZ and ROST-10-PZ have been consistently dry; and
 - b. P-60-12S; P-60-13S; ROST-7-PZ; and ROST-21-PZ have had insufficient water to sample.
2. The facility must submit certification that plugging and abandonment of the wells in Condition 2 above was carried out in accordance with the approved procedures to the Illinois EPA at the address below within thirty (30) days of the date that the well is plugged and abandoned. All pertinent information should be submitted to the appropriate State agencies. Attachment 1 to this letter provides well plugging and abandonment procedures.

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
3. The facility remains subject to the monitoring and reporting requirements for the interim network as defined in previous Illinois EPA letters. 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.
4. A completed RCRA Corrective Action Certification form must accompany all submittals made to the Illinois EPA regarding RCRA corrective action activities.

Work required by this letter, your submittal, 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 Act of 1989, the Professional Geologist Licensing Act and the Structural Engineering Act of 1989. This letter does not relieve anyone from compliance with these laws. All work that falls within the scope and definition of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation to the appropriate regulating authority.

Should you have any questions regarding groundwater-related matters associated with this project, please contact Amy Boley at 217/524- 4716; questions regarding other aspects of this project should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,



Joyce L. Minie, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

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Attachment: Well Plugging and Abandonment Procedures

ILLINOIS EPA MONITOR WELL PLUGGING AND ABANDONMENT PROCEDURES

		Well Construction	Plugging Procedure
I. Unconsolidated Sediment Wells			
I-A	...if backfilled with cement grout above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> Cut casing off at desired depth. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). Insert tremi pipe (1" i.d. pvc) into well and extend to bottom. Slowly pump slurry under low pressure through tremi pipe. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing. 	
I-B	...if backfilled with soft sediments (cuttings) above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> Knock out and remove thin surface concrete plug, if present. Re-auger entire length of well. Remove well casing from re-augured borehole. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). Insert tremi pipe (1" i.d. pvc) into augers and extend to bottom. Slowly pump slurry under low pressure through tremi pipe. Continue slow pumping until all formation water and the water slurry mix is displaced from top of casing. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. Pull a flight of augers (5" if in unstable materials and hole collapse is likely or 10" if in competent material and collapse is unlikely). Top off cement slurry after each flight is removed. 	
I-C	...if monitor well construction is unknown:	<ol style="list-style-type: none"> Follow procedures in I-A. 	
II. Bedrock Wells			
II-A	...All bedrock monitor wells:	<ol style="list-style-type: none"> Cut casing off at desired depth. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). Insert tremi-pipe (1" i.d. pvc) into well and extend to bottom. Slowly pump slurry under low pressure through tremi pipe. Slowly withdraw pipe making sure bottom of pipe remains below pure slurry. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing. 	

