



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-524-3301

MAR 13 2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7011 1150 0001 0857 9879

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

WRB Refining LP Wood River Refinery
Attn: Mr. Thomas Morgan
2331 City West Blvd
Houston, TX 77042

1191150002 – Madison County
Equilon Enterprises LLC dba Shell Oil Products US
ILD080012305
Log No. B-43R-CA-99,100,101,103,104,105
RCRA Permits
Permit Approval

Mr. Leroy Bealer,

This is in response to the submittals listed below, submitted by Wendy Pennington, P.E. of AECOM on behalf of Shell Oil Products US (SOPUS), regarding certain aspects of the RCRA corrective action activities being carried out at the above-referenced facility. This facility is located at 900 South Central Avenue, Roxana, Illinois; the RCRA permit for this facility was renewed on October 28, 2010 and last modified on October 31, 2022 (Log No. B-43R-M-49).

The following documents contain updates to the facility's standard operating procedures (SOPs) used in implementing the RCRA corrective action efforts required by the facility's RCRA permit:

Submittal No. 1 – The submittal entitled “Routine Updates to Previously Submitted Standard Operating Procedures”, dated April 06, 2018, was received by the Illinois EPA on April 09, 2018. This submittal contain updates to SOPs: 3, 4, 11, 44R, 48, 49, 52 and 56. The submittal was assigned Log No. B-43R-CA-99.

Submittal No. 2 – The submittal entitled “Routine Updates to Previously Submitted Standard Operating Procedures”, dated February 11, 2019, was received by the Illinois EPA on February 13, 2019. This submittal contain updates to SOPs: 18 and 24. The submittal was assigned Log No. B-43R-CA-100.

Submittal No. 3 – The submittal entitled “Routine Standard Operating Procedure Revisions”, dated September 24, 2019, was received by the Illinois EPA on September 25, 2019. This submittal contain updates to SOPs: 3, 4, 8, 10, 18, 20, 23, 24, 25, 26, 44R, 49, 51, 52, 53 and 56. The submittal was assigned Log No. B-43R-CA-101.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

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

Submittal No. 4 – The submittal entitled “Routine Standard Operating Procedure Revisions”, dated December 20, 2019, was received by the Illinois EPA on December 23, 2019. This submittal contain updates to SOPs: 5, 11, 12, 14, 17, 28, 29, 42 and 48. The submittal was assigned Log No. B-43R-CA-103.

Submittal No. 5 – The submittal entitled “Routine Updates to Standard Operating Procedures – SOPs Nos. 3, 20, 44R and 52”, dated June 18, 2020, was received by the Illinois EPA on June 19, 2020. This submittal contain updates to SOPs: 3, 20, 44R and 52. The submittal was assigned Log No. B-43R-CA-104.

Submittal No. 6 – The submittal entitled “Updates to Standard Operating Procedures - 2021”, dated March 22, 2021, was received by the Illinois EPA on March 23, 2021. This submittal contain updates to SOPs: 3, 4, 8, 10, 11, 18, 20, 23, 24, 25, 26, 44R, 48, 49, 51, 52, 53 and 56. The submittal was assigned Log No. B-43R-CA-105.

Based on the Illinois EPA’s review of the subject submittals, the updated SOPs are hereby approved with the following conditions and modifications:

1. The facility must develop procedures for the safe handling and disposal of investigation derived waste (IDW) including used wash water and rinse water as a separate SOP and submitted to the Illinois EPA for review and approval.
2. SOP No. 25 - Sample Containers, Preservation, and Holding Times: This must be revised to specify that the holding times for soil gas samples must be no more than 30 days for Summa canisters and no more than 48 hours for Tedlar bags.
3. SOP No. 44R - Soil Vapor Purging and Sampling: These procedures must be revised to require the following:
 - a. When conducting soil vapor purging and sampling, no soil gas sampling should take place within 48 hours after a rainfall event of ½ inch or greater and in standing or ponded water areas.
 - b. Per Section 742.227, the purging rate must not exceed soil gas sampling rate. The maximum purge rate should be 200 ml/min.
 - c. In order to use a leak testing method with no tracer gas, AECOM must first get the approval from Illinois EPA. Since, this has not been done, AECOM must either get approval from Illinois EPA for the provided method or exclude the said leak testing method from the SOP and only use the leak testing method with tracer gas.

- d. Soil gas samples must be collected from a depth of at least three feet below the ground surface or building foundation, but above the capillary fringe soil layer located 37.5cm above the top of the groundwater, when conducting soil vapor purging and sampling.
4. SOP No. 5 - Utility Clearance Procedures: A minimum required clearance distance (in feet) for utilities with a voltage above a 1,000 kV should be established by the utility owner/operator or registered professional engineer who is qualified to make such standards, with respect to electrical power transmission and distribution. It is also important that rig masts and excavating equipment must stay at least 50 feet away horizontally from overhead utilities unless/until the voltage and height of the system has been determined at which point a minimum of 20 feet should be observed. Marking a 360-degree area around the zone with cones or other objects to ensure a safe working area is visible is recommended.
 5. Within ninety (90) days of the date of this letter, the facility must submit, as a Class 1* permit modification request, revised pages to Section C.7.5 of the Permit Renewal Application for the current permit to refer to the most current SOPs, which are modified to reflect the conditions of this letter. A completed LPCPA-23 form and a 39i form must accompany this submittal.
 6. In the cover letter of the permit modification required in condition 5 above, the facility must describe the exact changes made to the proposed SOPs in the subject submittals to meet the conditions of this letter.
 7. Future submittals submitted to the Illinois EPA with SOP updates should follow a similar method described in condition 6. The changes made to the SOPs should be described first, followed by the complete SOP.
 8. Corrective action activities at the subject facility must be carried out in accordance with: (1) 35 Ill. Adm. Code 620, 724 and 742; (2) the facility's RCRA permit; and (3) Illinois EPA letters regarding such activities.
 9. A completed RCRA Corrective Action Certification form must accompany all information submitted to Illinois EPA regarding RCRA corrective action activities at the subject facility.

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 initial 35-day 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 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 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 this letter, please feel free to contact Amy Butler at (217) 558-4716 for specific questions related to groundwater issues. All other questions regarding this letter should be referred to Visal Poornaka at (217) 558-4717.

Sincerely,



Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

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B43RCA104-B43RCA105-Approval.docx

AMB TNA and WPN
Cc: Wendy Pennington, AECOM – (electronic copy only)
Leroy Bealer, SOPUS