



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

March 14, 2012

CERTIFIED MAIL

7009 3410 0002 3749 5710

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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-24
Received: September 19, 2011
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Bechtol:

This is in response to the document entitled, "ROST-4-PZ Delineation and Sampling Report", 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 was prepared in response to investigative activities associated with corrective action efforts for contaminated groundwater and free product (a.k.a. free phase hydrocarbons) within the Village of Roxana, and along the west fence line of the North Property WRR, and in the vicinity of ROST-4-PZ. The document was reviewed as a corrective action modification request to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

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

1. ROST-4-PZ(C) and ROST-3-PZ must be added to the Interim Groundwater Monitoring Program.
2. The Illinois EPA cannot reduce the gauging frequency from weekly to quarterly, at this time. However, gauging at the delineation wells for potential free product may be reduced to monthly events. All gauging data must be submitted within future routine monitoring reports. Once the oil recovery system is fully functional, or other measures are deemed adequate by the Illinois EPA to verify product is not present in the Village, the facility may request to further reduce gauging at these wells located within the Village of Roxana, at that time.

3. These wells required above must be gauged and sampled in accordance with procedures previously approved for the Groundwater Interim Monitoring Program within the Village. The actions required must be completed by the dates listed below, unless access cannot be obtained.
 - a. ROST-4-PZ(C) must be installed ninety (90) days of the date of this letter, as a 2-inch monitoring well, and screened at an interval to intercept current groundwater levels. Due to the elevated groundwater levels observed over the last several years, a fifteen (15) foot screened interval may be installed, in an effort to capture current groundwater elevations, and continue to serve as viable wells as groundwater elevations return to more normal condition.
 - b. Monthly gauging dates must reasonably coincide with quarterly gauging events for the WRR and Interim Groundwater Monitoring Program for better data comparisons.
 - c. The data collected for gauging, analytical analyses, and all other information related to well installation must be included within routine quarterly reports, beginning with the quarter data can be collected, for the Groundwater Interim Monitoring Program.
4. If product is detected at a well/piezometer located within the Village of Roxana, the well/piezometer must be gauged weekly and the facility must conduct ongoing product recovery techniques (i.e., absorbent socks) at those locations.
5. 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

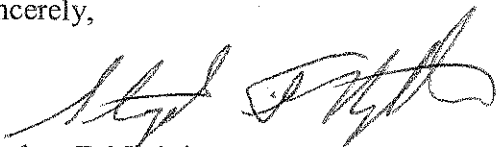
For information regarding the filing of an appeal, please contact:

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: Robert Billman, URS
Eric Peterson, ConocoPhillips

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