



September 10, 2013

Ms. Amy Boley
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794

**Subject: Request for Extension
Response to IEPA Letter dated July 18, 2013
Roxana, Illinois
119115002 – Madison County
Equilon Enterprises LLC d/b/a Shell Oil Products US
Log No. B-43R-CA-33, CA-45 and CA-48**

Dear Amy:

This letter is a follow-up to our telephone conversation on September 4, 2013 regarding a request for extension related to the Agency's July 18, 2013 letter to Shell Oil Products US. Condition 3 of the Agency's letter requests submittal of a plan to "*restore groundwater quality...within the Study Area....*"

You requested that this letter include a discussion of what SOPUS currently contemplates with respect to the subject plan. As I indicated, the scope of the plan has not yet been fully developed, however, SOPUS envisions a multifaceted approach, including but not limited to the following elements:

- Roxana groundwater ordinance, which prohibits groundwater use as a potable supply;
- Groundwater pumping at the refinery, which acts as a hydraulic control,
- LNAPL management, based on the ITRC LNAPL transmissivity principles and methodology;
- Possible enhancements such as air sparge/vapor recovery in focused areas, if determined to be beneficial; and
- Ongoing monitoring and evaluations to assess improvement over time.

The above items will be considered in the context of the applicable regulatory framework, e.g., TACO, Groundwater Management Zone, RCRA Permit.

We request a 60 day extension for this submittal. Based on this, the new due date is November 15, 2013.

1001 Highland Plaza Drive West, Suite 300
St. Louis, MO 63110
Phone: 314.429.0100
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If you have any questions during your review, please contact Kevin Dyer, SOPUS Sr. Principal Program Manager, at kevin.dyer@shell.com (618/288-7237), or me at bob.billman@urs.com (314/743-4108).

Sincerely,

URS Corporation, on behalf of Shell Oil Products US

A handwritten signature in blue ink that reads "Robert Billman".

Robert B. Billman
Senior Project Manager

cc: Kevin Dyer, SOPUS
Gina Search, IEPA Collinsville
Roxana Public Library
Marty Reynolds, Village of Roxana