



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

217/524-3300

February 23, 2016

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BY: _____

CERTIFIED MAIL

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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. 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 Nos. B-43R-CA-85 and B-43R-CA-90
Received: April 17, 2015; and February 1, 2016
RCRA Permit
Permit CA

Dear Mr. Dyer and Mr. Wulf:

This is in response to the two (2) subject submittals submitted on behalf of Shell Oil Products US (SOPUS) by URS Corporation (URS), in regards to the WRB Refining, LLC Wood River Refinery (WRR) in Roxana, Illinois. These documents were reviewed as corrective action modification requests to the Hazardous Waste Management RCRA Post-Closure Permit (Permit) for the WRR.

The documents being responded to in this letter are as follows:

Submittal No. 1 – (Log No. B-43R-CA-85) A document entitled, “Demonstration to Verify the Extent of Groundwater Contamination has been Delineated in Roxana, IL”, dated April 16, 2015, and received by the Illinois EPA April 17, 2015. The plan was prepared to satisfy the requirements of Condition 1.a of the Illinois EPA letter dated November 25, 2014 (Log No. B-43R-CA-70).

Submittal No. 2 – (Log No. B-43R-CA-90) A document entitled, “Additional Information – Groundwater Management Zone”, dated January 29, 2016, and received by the Illinois EPA February 1, 2016. The document is a draft version of letter intended for off-site property owners to acknowledge a GMZ on their property.

The subject submittals reviewed are subject to the conditions and modifications listed below with regards to groundwater:

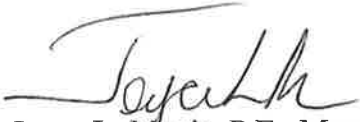
1. At this time, based on a review of the groundwater data collected to date, the Illinois EPA concurs that the extent of groundwater contamination has been defined within the Village of Roxana, Illinois.
2. As required by Condition IV.F.7 of the RCRA Permit, pursuant to 35 Ill. Adm. Code 620.250 and Section C.11 of the approved Permit Renewal Application, the facility must propose the establishment of a GMZ within ninety (90) days of the Illinois EPA approval that the source and extent of contamination along the western fenceline of the North Property and within the Village of Roxana has been defined. The GMZ proposal must include: (1) modifications to the groundwater corrective action determined necessary by the Route 111/Rand Avenue West Fenceline and Well P-60 Investigation, as approved in the Illinois EPA letter dated May 14, 2009, and any subsequent letters; (2) a proposed well network adequate to monitor the GMZ; and (3) a set of statistical procedures that are adequate to evaluate the effectiveness of the corrective action.
3. The submittal required in Condition 2 above must be submitted a Class 1* permit modification request, in accordance with Condition IV.K.2 of the RCRA Permit. The submittal must be submitted within ninety (90) days of the date of this letter, for Illinois EPA review and approval, and must also utilize the guidance document, "Guidance for Establishing a GMZ", found at <http://www.epa.illinois.gov/topics/cleanup-programs/rcra/remediation-projects/establishing-a-gmz/index>.
4. The draft letter for potential off-site property owners to acknowledge a GMZ is on their property appears to be adequate for its intended purpose.

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.

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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,



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

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