

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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MAR 19 2012

STATE OF ILLINOIS
Pollution Control Board

CONOCOPHILLIPS COMPANY,)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondents.)

PCB No. 12-101
(Permit Appeal NPDES)

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NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on March 14, 2012, I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, c/o John T. Therriault, Assistant Clerk, James R. Thompson Center, 100 W. Randolph St., Ste. 11-500, Chicago, IL 60601, five copies of the AGENCY'S RECORD.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

LISA MADIGAN,
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: *Rachel R. Medina*
RACHEL R. MEDINA
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: March 14, 2012

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CERTIFICATE OF SERVICE

I hereby certify that I did on March 14, 2012, cause to be served by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box in Springfield, Illinois, a true and correct copy of the following instruments entitled NOTICE OF FILING and AGENCY RECORD upon the persons listed on the Service List.

Rachel R. Medina

Rachel R. Medina
Assistant Attorney General

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This filing is submitted on recycled paper.

SERVICE LIST

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(Agency Record/List of Documents only)

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RECORD

Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, in accordance with 35 Ill. Adm. Code 105.212 and 105.116, files as its Record in this cause the Illinois EPA's record of ConocoPhillips Company's National Discharge Elimination System ("NPDES") Permit No. IL0000205 issued for the Wood River Refinery on December 22, 2011 and consisting of the following documents:

Current Permit Documents

1. Letter (first page) dated September 29, 1987, from Shell Oil Company to Illinois EPA.
2. Illinois State Operating Permit No. 1987-EE-3209, issued to Cardox Corporation on September 17, 1987.
3. Cover letter dated September 30, 2008, with enclosed NPDES permit renewal application, from ConocoPhillips.
4. Illinois State Operating Permit No. 2008-AO-1537, issued to Village of Roxana on December 26, 2008.
5. E-mail communications from David Rieser to Sanjay Sofat and Al Keller on November 13, 2008, and from Mr. Sofat to Jaime Rabins and Darin LeCrone on November 14, 2008, with attached mercury compliance plan.
6. Process flow diagram.

7. CROPA toxics fact sheet and memorandum, dated March 18, 2009.
8. E-mail communications on April 22, 2009 between Jaime Rabins and Brian Koch.
9. Constituents in Wastewater (Chapter 2, page 97).
10. CROPA toxics fact sheet and memorandum, dated June 9, 2009.
11. E-mails on July 22, 2009, between Brad Sims, ExxonMobil Refining & Supply, and Bob Mosher.
12. Letter dated July 29, 2009, from Herman Seedorf III, Refinery Manager, ConocoPhillips, to Illinois EPA, with attached letter dated July 27, 2009, from James Huff to Jay Rankin.
13. Memorandum dated July 29, 2009, from Bill Buscher to Jaime Rabins.
14. Letter dated August 17, 2009, from Herman Seedorf III to Illinois EPA.
15. E-mail on September 2, 2009, from Scott Twait to Bob Mosher, and e-mail on September 2, 2009, from Bob Mosher to Jaime Rabins.
16. E-mails on December 29, 2009, from Bob Mosher to Jaime Rabins.
17. Industrial NPDES permit review notes, February 1, 2010.
18. Production based load limit calculations, February 2, 2010.
19. Chemical constituent summary, outfall locations and ammonia worksheet.
20. 15-day public notice with draft permit, distributed on May 21, 2010.
21. E-mails on June 24, 2010, between David Soong, EPA Region V, and Jaime Rabins.
22. E-mail communications on June 24, 2010, between Bob Mosher and Jaime Rabins.
23. E-mail on June 29, 2010, from Brian Bell, EPA Region V, and Jaime Rabins.
24. Letter dated July 6, 2010, from Kevin Pierard, EPA Region V, to Alan Keller.
25. E-mail communications on July 15, 2010, between Bob Mosher and Jaime Rabins.
26. Letter dated July 15, 2010, from David Dunn to Darin LeCrone.

27. 15-day notice review notes dated November 22, 2010, prepared by Jaime Rabins.
28. Public notice order form sent December 16, 2010.
29. 30-day public notice with draft permit, distributed December 21, 2010.
30. Public notice posting confirmation postcard dated December 21, 2010.
31. Public notice for the Alton Telegraph dated December 21, 2010.
32. Letter dated January 13, 2011, from David Dunn to Darin LeCrone.
33. E-mail communications on January 18, 2011, between Bob Mosher and Jaime Rabins.
34. ConocoPhillips equipment descriptions, photos and diagrams.
35. Mercury compliance study.
36. Participant list for March 15, 2011 meeting between ConocoPhillips and Illinois EPA.
37. Letter dated April 13, 2011, from Michael Bechtol to Darin LeCrone.
38. Letter dated April 29, 2011, from David Rieser to Sanjay Sofat.
39. Participant list for June 29, 2011 meeting between ConocoPhillips and Illinois EPA, with attachments.
40. Letter dated July 20, 2011, from David Riser to Sanjay Sofat.
41. [attorney client privileged document]
42. Form 10-Q quarterly report for ConocoPhillips, August 2, 2011.
43. E-mails on August 30, 2011 and September 1, 2011, among Messrs. Rabins, Mosher, LeCrone and Keller; and Dan Heacock.
44. ConocoPhillips financial and news page dated September 6, 2011.
45. E-mails on June 20, 2011, September 6, 2011, and September 7, 2011, among Messrs. Mosher, Rabins, Keller, Sofat, LeCrone, and Deborah Williams.
46. E-mail on September 30, 2011, from David Rieser to Sanjay Sofat.

47. Letter dated November 10, 2011, from Jay Churchill, with attachments.
48. 30-day notice review notes dated November 16, 2011, prepared by Jaime Rabins.
49. E-mails on December 15, 2011, between Jaime Rabins and Darin LeCrone.
50. E-mails on December 15, 16 and 19, 2011, among Jay Rankin, Jaime Rabins and Darin LeCrone.
51. E-mail on December 20, 2011, from Darin LeCrone to Jaime Rabins.
52. Letter dated December 22, 2011, from Al Keller to ConocoPhillips Wood River Refinery, with attached NPDES Permit No. IL0000205, issued December 22, 2011 and effective January 1, 2012.

Previous (Modification) Documents

53. Memorandum dated March 12, 1993, from Fred Rosenblum to Bob Mosher.
54. Memorandum dated June 3, 1993, from Tim Kluge to Bob Mosher.
55. Fax dated February 25, 2004, from Jay Rankin to Fred Rosenblum.
56. Memorandum dated September 9, 2004, from Jay Rankin to Blaine Kinsley, .
57. Letter dated August 18, 2005, from Herman Seedorf III to Illinois EPA.
58. Letter dated May 12, 2006, from Neal Sahni, ConocoPhillips, to Illinois EPA, with attached application for modification to permit.
59. Materials from meeting on refinery expansion held on May 18, 2006.
60. Permit review notes dated May 23, 2006, prepared by Jaime Rabins.
61. Permit review note dated May 24, 2006, prepared by Jaime Rabins.
62. Memorandum dated May 24, 2006, from Jaime Rabins to Bob Mosher.
63. Docks stormwater pollution prevention plan, revision date July 24, 2006.
64. Illinois Department of Natural Resources EcoCAT results report, August 15, 2006.
65. Memorandum dated August 15, 2006, from Bob Mosher to Jaime Rabins.

66. Memorandum dated August 16, 2006, from Bob Mosher to Jaime Rabins.
67. E-mail on August 31, 2006, from Jay Rankin to Jaime Rabins.
68. Permit review notes dated September 8, 2006, prepared by Jaime Rabins.
69. Public notice of draft NPDES permit, November 3, 2006.
70. Letter dated December 4, 2006, from Illinois Chapter of the Sierra Club to Jaime Rabins.
71. E-mail on April 16, 2007, from Jay Rankin to Jaime Rabins.
72. Permit Schedule N – Waste Characteristics, received April 27, 2007.
73. Wood River Refinery stormwater drainage map.
74. Letter faxed on June 28, 2007, from Eric Prestbo, Frontier Geosciences, to Jay Rankin.
75. E-mail on July 25, 2007, from Jay Rankin to Jaime Rabins.
76. E-mail on July 26, 2007, from Jay Rankin to Jaime Rabins.
77. E-mails on July 26, 2007, between Jay Rankin to Jaime Rabins.
78. E-mail on July 30, 2007, from Jay Rankin to Jaime Rabins.
79. E-mail on July 30, 2007, from Jay Rankin to Jaime Rabins.
80. Application guide, August 2, 2007.
81. Mixing Zone Update for Wood River Refinery, dated October 2007 and prepared by James E. Huff, P.E.
82. Letter dated November 5, 2007, from Bob Mosher to Jay Rankin.
83. Heavy metal discharge data, August-December, 2007.
84. Data, January and February 2008.
85. E-mails on March 6 and 7, 2008, between Jay Rankin and Bob Mosher, with attached modeling.
86. Letter dated April 25, 2008, from James Huff to Bob Mosher.
87. Letter dated May 6, 2008, from Herman Seedorf III to Illinois EPA.
88. E-mails on May 23, 27, and 29, 2008, between Jim Huff and Bob Mosher.
89. E-mail dated May 30, 2008, from Jim Huff to Bob Mosher.


90. E-mails on May 30, 2008, between Bob Mosher and Al Keller, Sanjay Sofat, and Jaime Rabins.
91. Revisions, May 2008.
92. E-mail on June 10, 2008, from Bob Mosher to Jaime Rabins and Sanjay Sofat.
93. Memorandum dated June 12, 2008, from Bob Mosher to Jaime Rabins
94. E-mails on June 18, 2008, between Bob Mosher and Jaime Rabins.
95. E-mails on June 18, 2008, between Bob Mosher and Jaime Rabins.
96. E-mail on June 28, 2008, from Jay Rankin to Jaime Rabins.
97. Letter dated July 7, 2008, from Herman Seedorf III to Illinois EPA.
98. Note dated July 21, 2008, from Jay Rankin to Jaime Rabins, with attached original cover letter to modification request.
99. Letter dated August 7, 2008, from Herman Seedorf III to DWPC, Permit Section.
100. Letter dated August 8, 2008, from Herman Seedorf III to DWPC, Permit Section, with attached requested permit application material.
101. Graphs of plume measurements.
102. E-mails on September 4, 2008, from David Rieser to Sanjay Sofat, and from Sanjay Sofat to Marcia Willhite, Al Keller and Bob Mosher.
103. Letter dated September 19, 2008, from David Rieser to Al Keller.
104. E-mail on October 15, 2008, from Bob Mosher to Jaime Rabins.
105. E-mails on October 17, 2008, from David Rieser to Sanjay Sofat, and on October 20, 2008 among Sanjay Sofat, Al Keller, Darin LeCrone, and Jaime Rabins.
106. E-mail on October 21, 2008, from Bob Mosher to Jaime Rabins.
107. E-mail on October 24, 2008, from David Rieser to Sanjay Sofat, Al Keller, and Bob Mosher.
108. E-mail on November 13, 2008, from David Rieser to Sanjay Sofat and Al Keller, with attached draft mercury compliance plan and 95th percentile calculation.
109. E-mails on November 13, 2008, from David Rieser to Sanjay Sofat and Al Keller, and on November 14, 2008 from Sanjay Sofat to Jaime Rabins.
110. 30-day notice review notes dated December 3, 2008, prepared by Jaime Rabins.

111. E-mail on December 8, 2008, from Jaime Rabins to David Rieser and Jay Rankin, with attached draft modified NPDES permit.
112. E-mails on December 9, 2008, from David Rieser to Al Keller and from Al Keller to Jaime Rabins.
113. Table of reported concentrations in wastewater.
114. Letter dated February 5, 2009, from Al Keller, with attached responsiveness summary.
115. Letter dated February 5, 2009, from Al Keller to ConocoPhillips, with attached modified NPDES Permit No IL0000205.
116. Letter dated February 19, 2009, from Al Keller, noting correct link to Illinois EPA's website.

Respectfully submitted,

LISA MADIGAN,
Attorney General of the
State of Illinois,

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

By: 
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