This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (35 Ill. Adm. Code) Section 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft Renewal Resource Conservation and Recovery Act (RCRA) permit. This renewal permit will allow Marathon Petroleum Company LP (hereafter referred to as Marathon or the Robinson Refinery) to continue operating and maintaining three RCRA hazardous waste management units (HWMUs) subject to regulation under 35 Ill. Adm. Code 702.120 at its petroleum refinery in Robinson, Illinois. These HWMUs include: (1) the Waste Container Storage Area (WCSA); (2) the East Land Treatment Facility (East LTF); and (3) the West LTF Corrective Action Management Unit (CAMU). Per RCRA classification, the HWMUs are regulated under 35 Ill. Adm. Code 724 as containers (Subpart I), land treatment facilities (Subpart M), and correction action management units (Subpart S), respectively. Pursuant to 35 Ill. Adm. Code 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

I. INTRODUCTION

The draft renewal permit for Marathon contains all of the standard conditions required by 35 Ill. Adm. Code Parts 702, 703, and 724 for the continued management of hazardous waste at the Robinson Refinery; and the applicable conditions of 35 Ill. Adm. Code Part 724 Subparts I, M and S. The Robinson Refinery is an existing facility that has been operating under its current RCRA Part B Permit issued November 16, 2007 (B-56R) and prior to that since November 4, 1988 (B-56) and prior to that date, under interim status since the effective date of RCRA (November 19, 1980).

II. DESCRIPTION OF FACILITY

A. General

The Robinson Refinery is a complex, high-conversion refinery that processes crude oil into a full range of petroleum products, with special emphasis on low-sulfur fuels for highway use. The Refinery’s petroleum products are distributed to wholesale and retail customers throughout the Midwest. This permit, when finalized, will authorize treatment and storage of listed and characteristically hazardous wastes in addition to various nonhazardous wastes in there HWMUs described in Section III.A below.

B. Site Description

Marathon is located on a 927-acre site in central Crawford County, near the
southeastern corner of Robinson, Illinois. The mailing address for the facility is:

Marathon Petroleum Company LP
Illinois Refining Division
400 S Marathon Avenue
Robinson, Illinois 62454

III. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

A. Description of Units

1. Waste Container Storage Area (WCSA)

Wastes are stored in containers in this unit prior to off-site treatment and/or disposal. The existing RCRA permit and the draft renewal permit require that inspections be performed to detect leaks and deterioration of containers and containment system caused by corrosion or other factors. Results of all inspections and the activities undertaken to correct deficiencies are documented in the operating record for the facility.

2. East Land Treatment Facility (East LTF)

Many of the Refinery’s as-generated non-hazardous wastes are permitted for treatment/disposal at this on-site 20-acre land treatment facility. In addition, hazardous wastes that meet the land disposal restrictions outlined in 35 Ill. Adm. Code 728 may also be treated/disposed of in the East LTF. RCRA regulations require that these wastes be completely degraded, transformed or immobilized in this unit in a manner that is protective of human health and the environment. The draft RCRA renewal permit contains the existing requirements for monitoring of soil and soil-pore liquids below the treatment zone to determine if releases have occurred. Scheduled required inspections include: a) Run-off control systems; b) Run-on control systems; c) Dikes; and d) Run-off collection tanks. Results of all inspections and the activities undertaken to correct deficiencies are documented in the operating record for the facility.

3. West LTF Corrective Action Management Unit (CAMU)

The West LTF CAMU is a 20-acre land treatment facility that once received many of the Refinery’s as-generated hazardous and nonhazardous wastes. This unit now receives wastes generated from the remediation of facility solid waste management units (SWMUs) and areas of concern (AOCs) carried out in accordance with the corrective action provisions of the facility’s RCRA permit. RCRA regulations require that these wastes be completely degraded, transformed or immobilized in this unit in a manner that is protective of human health and the environment. The original RCRA permit and the draft renewal permit require
monitoring of soil and soil-pore liquids below the treatment zone to
determine if releases have occurred. Scheduled required inspections
include: a) Run-off control systems; b) Run-on control systems; c) Dikes
and d) Run-off collection tanks. Results of all inspections and the
activities undertaken to correct deficiencies are documented in the
operating record for the facility.

B. Groundwater Monitoring Programs at Hazardous Waste Management Units

Marathon’s permit requires groundwater monitoring consisting of a Detection
Monitoring Program for the East Land Treatment Facility (LTF) and the West
LTF Corrective Action Management Unit (CAMU). The Detection Monitoring
Program utilizes a network of eight (8) existing monitoring wells screened in the
Merom Sandstone Member of the Mattoon Formation. Six (6) of the wells are
located downgradient of the two units, and two (2) of the wells are located
upgradient.

C. Standard Permit Conditions

Standard Permit Conditions 1 to 63 are regulatory requirements of 35 Ill. Adm.
Code, Parts 702, 703 and 724. These conditions are of a general nature and are
applicable to all Hazardous Waste Management facilities regulated pursuant to an
Illinois EPA permit. These conditions include the effectiveness of the permit,
permit actions, severability, permit expiration, monitoring and retention of
records, and compliance schedules.

IV. CORRECTIVE ACTION

In accordance with Section 3004(u) and (v) of RCRA and 35 Ill. Adm. Code 724.201,
Marathon must institute such corrective action as necessary to protect human health and
the environment from all releases of hazardous wastes or hazardous constituents from
any solid waste management unit (SWMU) or area of concern (AOC) at its facility in
Robinson, Illinois.

A RCRA permit for this facility was issued jointly by the Illinois EPA and USEPA on
September 29, 1988; the USEPA portion of that permit contained corrective action
requirements. In addition, the renewed RCRA permit issued by Illinois EPA on
November 16, 2007 also set fourth corrective action requirements which needed to be
met. Marathon has completed a substantial amount of investigation and remediation at
the facility to date. This draft Renewal Permit identifies the activities that still must be
carried out to ensure the requirements of 35 Ill. Admin. Code 724.201 are met at this
facility.

V. CONSIDERED PERMIT ACTIONS OTHER THAN RCRA

A. Air
The air emissions from a hazardous waste management facility are regulated under the Clean Air Act (CAA), the Illinois Environmental Protection Act and State regulations at Title 35: Environmental Protection, Subtitle B: Air Pollution. Under these regulations, a permit is required to install or operate any process which is, or may be, a source of air pollutants. Marathon has proper permits for sources of air emissions from their Waste Water Treatment Units, Refinery Process Units, and Product Storage Tanks.

B. Water

A discharge of any waste waters from a hazardous waste management facility into the waters of the State, is required to have a National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois EPA under Section 39 (b) of the Environmental Protection Act. Marathon has obtained discharge permits for their activities.

VI. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 Ill. Adm. Code 705.162 (a) (2), the public is given at least forty-five (45) days to review the renewal permit application and draft permit and provide comments on the draft renewal permit conditions prior to Illinois EPA taking any final permitting action on the renewal permit application. The comment period will begin on __________, the date of the first publication of the public notice in the Robinson Daily News, the newspaper of general circulation in the area. The comment period will end on __________.

Any interested person may request a public hearing on Illinois EPA’s draft renewal permit by contacting the Illinois EPA contact person listed below. The final decision as to whether a public hearing will be held lies with Illinois EPA (the reasons for holding a public hearing are set forth in 35 Ill. Adm. Code 705.182). If a public hearing is held, Illinois EPA is required to give notice to the public at least thirty (30) days prior to the scheduled date of the hearing. If a public hearing is held, the comment period will end thirty (30) days after the date of that hearing.

When the Illinois EPA makes the final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. In addition, a response to comments document will be developed and made available to everyone who provided comments on the draft renewal permit. The notice will reference the regulations governing appeals of the final permit decision found at Ill. Adm. Code 705.212. If no appeal is filed, the permit will become effective thirty-five (35) days after service of notice of the decision or at a later date if stated in the permit.

Copies of the renewal permit application, draft permit and this fact sheet will be available for review at:

Robinson Township Public Library
606 North Jefferson
Robinson, IL 62454
Any interested person may submit a request for a public hearing or submit written comments on the Illinois EPA’s draft renewal permit to:

Ms. Rachel Stewart, Office of Community Relations
Illinois Environmental Protection Agency
1021 N. Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

The Illinois EPA’s complete administrative record for this draft renewal permit is open for public inspection at the Illinois EPA's Springfield office at the above address from 9:00 a.m. to 5:00 p.m., Monday through Friday. The Illinois EPA administrative record contains the renewal permit application, draft renewal permit, fact sheet, and other supporting documents and correspondence submitted to or developed by the Illinois EPA. Contact Ms. Stewart at the address above, or at 217/782-2224, to make an appointment to inspect the Illinois EPA administrative record or for further information concerning this draft renewal permit.