

9551.1991(14)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 1 1991

Mr. David R. Saad
Environmental Coordinator
Illinois Refining Division
Marathon Petroleum Company
Robinson, IL 62454

Re: No Migration Petition for the Robinson, Illinois Land
Treatment Facility and Storage Surface Impoundments
(F-91-NMPP-FFFFF)

Dear Mr. Saad:

I understand from Jim Michael and Dave Eberly that the EPA Marathon meeting on April 30 was very productive. Your interest in discussing the proposed response to the Notice of Deficiency for Robinson's No-Migration petition was welcomed by us. One procedural question hanging over from that meeting concerns the best approach for revising Marathon's petition to cover only the East land treatment unit.

In our judgment, the most efficient approach would be for you to withdraw your petition for the three surface impoundments and the two land treatment units and to submit a new petition limited to the East land treatment unit. That approach would simplify four related tasks for Marathon and EPA. First, it would close out the administrative record on your current petition. Our recommendation for denial is still on the record, and your withdrawal would eliminate any need to publish a decision or to maintain a docket. Second, Marathon would not have to respond to our Notice of Deficiency, but could instead use it as a guide in preparing a new petition for the East unit. Third, a new petition would be easier to prepare than a revision to the existing petition which would involve excising or editing discussion of all areas except as they pertain to the East unit. Finally, a new petition for the East unit would, we believe, be consistent with any required permit modifications.

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We, therefore, recommend a letter of withdrawal for the existing petition in response to our letter of November 6, 1990 and submission of a new petition for the East unit as soon as possible. As we stated at our meeting on April 30, we will focus our review of the new petition on those technical concerns in the November 6 letter related to the East unit.

Please be assured that Marathon's withdrawal of its original petition and subsequent submission of the new petition would not affect Marathon's position in the queue for review and decisionmaking by EPA.

If you have any questions on implementing this approach, please call Dave Eberly on 202-382-4691.

Sincerely,

Original Document signed

Elizabeth Cotsworth, Chief
Assistance Branch (OS-343)

cc: Ronald Andes, Marathon
Jim Michael, AB, PSPD, OSW
Dave Eberly, AB, PSPD, OSW
Gail Hruska, EPA Region V
David Deisher, IEPA