

Williams Petroleum Services, LLC

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April 12, 2010

Mr. Kenneth Herstowski, P.E.
Environmental Protection Agency, Region 7
901 N. Fifth Street
Kansas City, Kansas 66101

Re: Quarterly Update – 1st Quarter 2010
Former Augusta Refinery (FAR) RCRA Facility Investigation (RFI)
Williams Petroleum Services (WPS), LLC
Augusta, Kansas – KSD007235138

Dear Mr. Herstowski:

This letter is offered as the report of investigation activities at the Former Augusta Refinery in accordance with Section X, "Reporting," of the Administrative Order on Consent dated October 24, 2003, Docket No. RCRA-07-2004-0009. This report addresses activities occurring during the period of January 1 through March 31, 2010.

Description of Activities

On March 4, 2010, Shaw collected two soil gas samples in areas with noted LNAPL. At that time, Shaw was unable to collect soil gas samples at two additional locations due to shallow groundwater encountered in the sampling point. Shaw will attempt to collect soil gas samples at these locations at a later date. Results of the off-site soil gas sampling events will be presented in a separate site characterization report and incorporated into the HHRA.

In mid-January WPS awarded the interim Corrective Measure of SWMU 17 to Shaw. On February 17, 2010, Shaw submitted to EPA and KDHE a Summary Work Plan Document outlining the proposed Corrective Measures activities. On March 4, 2010, a detailed Interim Corrective Measures Work Plan and field work notification were provided to EPA and KDHE. On March 15, 2010, Shaw initiated Interim Corrective Measures at SWMU 17.

In correspondence dated March 25, 2010, the RFI Site Characterization Report for Groundwater and the Walnut River was submitted to EPA and KDHE.

Summary of All Findings

None

Summaries of All EPA Approved Changes

None

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Summaries of All Contacts

- February 8 – In e-mail correspondence on February 8, 2010, Shaw received EPA approval to use HydraSleeve in groundwater monitor wells without NAPL during groundwater sampling. EPA further indicated further use of HydraSleeve will be evaluated based upon review of sample results or other sampling/analysis issues identified.
- On February 17, 2010, Shaw submitted to EPA and KDHE a Summary Work Plan Document outlining the proposed Corrective Measures activities at SWMU 17.
- On March 4, 2010, a detailed Interim Corrective Measures Work Plan and field work notification were provided to EPA and KDHE.
- On March 4, 2010, Shaw provided notification to EPA of the change in Shaw Project Manager from Mark deLorimier to David Way.
- On March 15, 2010, Shaw mobilized to initiate Interim Corrective Measures at SWMU 17.
- In correspondence dated March 25, 2010, the RFI Site Characterization Report for Groundwater and the Walnut River was submitted to EPA and KDHE. In transmittal of this report, WPS and Shaw requested a meeting with EPA to present the Site Characterization Report and further discuss concurrence of the human health risk assessment (HHRA) exposure areas.
- In correspondence dated March 26, 2010 from Kelly Warren of the KDHE Bureau of Solid Waste to Phil Roberts of WPS, KDHE indicated that they would be assuming oversight of the SWMU 17 project and requested additional information for a minor permit modification for Construction and Demolition Landfill Permit 615.

Summaries of Problems Encountered

None

Actions to Rectify Problems

None

Changes in key project entities

- On March 4, 2010, Shaw provided notification to EPA of the change in Shaw Project Manager from Mark deLorimier to David Way.

Projected Work for the Next Reporting Period

The following activities will be performed or initiated during the next reporting period:

- Meet with EPA to reach concurrence on the HHRA exposure areas.
- Continued preparation of the HHRA
- Complete the interim corrective measures at SWMU 17
- Present conceptual design of interim corrective measure at Walnut River

Other Relevant Documentation

None

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to

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those identified portion(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with the procedures designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please provide all written correspondence regarding this Quarterly Update directly to Mr. Phil Roberts with Williams Petroleum Services, LLC. If you have any questions, do not hesitate to contact Mr. Roberts at (918) 573-0757.

Sincerely,
Williams Petroleum Services, LLC

A handwritten signature in black ink that reads "Dennis Elliott". The signature is written in a cursive style with a large initial "D".

Dennis Elliott
Vice President
Williams Petroleum Services, LLC

c: David Way, Shaw Environmental, Inc.