

Williams Petroleum Services, LLC

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October 11, 2010

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

Re: Quarterly Update – 3rd 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 July 1 through September 30, 2010.

Description of Activities

In correspondence dated September 2, 2010, the Human Health Risk Assessment (HHRA) Work Plan Addendum was submitted to EPA and KDHE.

On September 9, 2010, a standing project status conference call was held with EPA and KDHE. During this call, the HHRA Work Plan Addendum, overview of SWMU-17 Interim Actions, status of the Soil Gas RFI, and plans for the interim action at the Walnut River Area of Interest (AOI) were each discussed. During this call, Shaw and WPS requested review and approval of the HHRA Work Plan Addendum by EPA within 30 days. This will enable Shaw to submit the HHRA Report to the EPA by December 31, 2010.

During the reporting period, SWMU 17 Interim Actions were completed. Final cap seeding was completed on September 26, 2010.

In correspondence dated September 30, 2010, the Walnut River AOI Sampling Work Plan was submitted to EPA and KDHE. This sampling Work Plan outlined planned data collection activities in the AOI.

Summary of All Findings

None

Summaries of All EPA Approved Changes

None

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Summaries of All Contacts

- On July 15, 2010 Shaw conveyed via email, the SWMU 17 updated final stabilized placement and grade schedule to Kelly Warren with KDHE.
- On July 21, 2010, Kelly Warren with KDHE visited the SWMU 17 project site to review Interim Action status.
- On July 30, 2010, Shaw conveyed via email, the SWMU 17 GCL placement schedule to Kelly Warren with KDHE.
- On August 4, 2010, Kelly Warren with KDHE visited the SWMU 17 project site to review the Interim Action status and placement of GCL.
- On September 2, 2010, the HHRA Work Plan Addendum was submitted to EPA and KDHE.
- On September 9, 2010, a standing project status conference call was held with EPA and KDHE.
- On September 30, 2010, the Walnut River AOI Sampling Work Plan was submitted to EPA and KDHE.

Summaries of Problems Encountered

None

Actions to Rectify Problems

None

Changes in key project entities

None

Projected Work for the Next Reporting Period

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

- Continued preparation of the HHRA, pending approval of the HHRA Work Plan Addendum from EPA.
- Submit the Soil Gas RFI to EPA and KDHE.
- Continue monthly status calls with EPA.
- Initiate Walnut River AOI data collection activities.
- Complete reporting activities for the interim corrective measures at SWMU 17.

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 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

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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, flowing style.

Dennis Elliott

Vice President

Williams Petroleum Services, LLC

c: David Way, Shaw Environmental, Inc.