

## Williams Petroleum Services, LLC

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January 5, 2011

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

Re: Quarterly Update – 4th 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 October 1 through December 30, 2010.

### *Description of Activities*

On October 21, 2010, a standing project status conference call was held with EPA and KDHE. During this call, the Human Health Risk Assessment (HHRA) Work Plan Addendum and plans for the investigation activities at the Walnut River Area of Interest (AOI) were discussed. Additional briefings by WPS included the status of SWMU-1 and 2 activities, site security review, pipeline abandonment under the levee system, and site controlled burns. Shaw and WPS requested written approval of the HHRA Work Plan Addendum and AOI scope of work.

On October 25, 2010, Walnut River data collection activities were initiated per the September 30, 2010 Work Plan. Field activities continued per the work plan through December 1, 2010.

On December 7, 2010, Shaw revised the public website for the FAR project with updated regulatory contact information.

In correspondence dated December 11, 2010, the Interim Corrective Measures Report for the SWMU-17 Asphalt Landfill was submitted to KDHE and EPA.

In correspondence dated December 16, 2010, the RFI Characterization Report for Soil Gas was submitted to EPA and KDHE. This report presents the results of the third and final phase of the RFI: the soil gas sampling program. Together, the RFI site characterization results for soil, groundwater, and soil gas provide the data necessary for completion of the HHRA to evaluate

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potential health risks and hazards of the FAR for current and future exposures both on and off-site.

### *Summary of All Findings*

Data from the AOI field activities is pending receipt from the laboratory and data validation.

### *Summaries of All EPA Approved Changes*

- In email dated October 25, 2010 from EPA to WPS, EPA provided approval to proceed with the Walnut River AOI data collection activities per the Walnut River AOI Work Plan dated September 30, 2010.
- In email dated October 25, 2010 from EPA to WPS, EPA provided approval to proceed with the HHRA evaluation per the HHRA Work Plan Addendum dated September 2, 2010.

### *Summaries of All Contacts*

- In correspondence dated October 12, 2010 from Shaw to Wheelbarrow Inc., notification of Walnut River AOI field activities was submitted for sampling locations on Wheelbarrow property.
- In correspondence dated October 14, 2010 from Shaw to the City of Augusta, a request for sampling location approval for Walnut River field activities was submitted for sampling locations on City property.
- On October 21, 2010, a standing project status conference call was held with EPA and KDHE.
- In email dated October 25, 2010 from EPA to WPS, EPA provided approval to proceed with the Walnut River AOI data collection activities per the Walnut River AOI Work Plan dated September 30, 2010.
- In email dated October 25, 2010 from EPA to WPS, EPA provided approval to proceed with the HHRA evaluation per the HHRA Work Plan Addendum dated September 2, 2010.
- On October 28, 2010, Shaw personnel met with City of Augusta personnel to clear AOI sampling locations on City property. On that same day via email from the City of Augusta to WPS, approval of the sampling locations on City property was received.
- On December 6, 2010, Shaw personnel had a call with Kelly Warren of the KDHE Bureau of Waste to discuss submittal of the SWMU-17 report.
- In correspondence dated December 11, 2010, the Interim Corrective Measures Report for the SWMU-17 Asphalt Landfill was submitted to KDHE and EPA.
- In email correspondence dated December 14, 2010 from WPS to Bill Keefer with the City of Augusta, WPS provided a status update of FAR site activities.

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- In email correspondence dated December 14, 2010 from Shaw to EPA and KDHE, a project status update was provided in lieu of the standing conference call.
- In correspondence dated December 16, 2010, the RFI Characterization Report for Soil Gas was submitted to EPA and KDHE. This report presents the results of the third and final phase of the RFI: the soil gas sampling program. Together, the RFI site characterization results for soil, groundwater, and soil gas provide the data necessary for completion of the Human Health Risk Assessment (HHRA) to evaluate potential health risks and hazards of the FAR for current and future exposures both on and off-site.

### *Summaries of Problems Encountered*

Late summer drought conditions did not allow the SWMU-17 seed cover to fully establish prior to the dormant winter season.

### *Actions to Rectify Problems*

SWMU-17 cap seeding will be re-visited in spring to determine if re-seeding is necessary to obtain the necessary vegetative coverage.

### *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:

- Continue preparation of the HHRA. Shaw and WPS anticipate submittal of the HHRA to EPA and KDHE in the first quarter of 2011.
- Coordinate a project review/update meeting with EPA to present the conclusions of the RFIs and to discuss the HHRA.
- Continue monthly status calls with EPA.
- Complete Walnut River AOI data collection reporting activities.

### *Other Relevant Documentation*

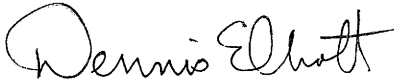
None

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 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.

## Williams Petroleum Services, LLC

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 fluid and cursive, with the first name "Dennis" being larger and more prominent than the last name "Elliott".

Dennis Elliott  
Vice President  
Williams Petroleum Services, LLC

c: David Way, Shaw Environmental, Inc.