

Williams Petroleum Services, LLC

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April 4, 2011

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

Re: Quarterly Update – 1st Quarter 2011
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, 2011.

Description of Activities

During the reporting period, Shaw and WPS continued development of the Human Health Risk Assessment (HHRA) for the FAR. Additional actions included further division of off-site exposure areas to more accurately account for current exposure conditions and inclusion of the Walnut River Area of Interest (AOI) data in the off-site risk assessment.

Also during the reporting period, Shaw and WPS completed data collection actions at the Walnut River AOI for the further evaluation of Interim Corrective Measures in this area. The Walnut River Area of Interest Interim Measures Data Collection Report was submitted to KDHE and EPA in correspondence dated March 31, 2011.

Summary of All Findings

Data from the AOI field activities is summarized in the Walnut River Area of Interest Interim Measures Data Collection Report dated March 31, 2011.

Summaries of All EPA Approved Changes

- In email dated January 21, 2011 from Shaw to EPA, Shaw proposed to further divide the off-site exposure area into more distinct exposure areas to more accurately account for current exposure condition variations. EPA provided concurrence with this approach in email dated January 24, 2011.

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Summaries of All Contacts

- On January 25, 2011, a standing project status conference call was held with EPA and KDHE. Discussion topics included the HHRA schedule, SWMU-17 update, Walnut River AOI update, and SWMU-16 Interim Measures.
- On February 21, 2011, Shaw renewed the SWMU-17 Storm Water Construction Permit with the KDHE pending spring vegetation growth and/or re-seeding.
- On February 22, 2011, Shaw had a call with Mr. Ron Davis of the City of Augusta Sewer Department to obtain information regarding routing of storm water to the east of the FAR.
- The Walnut River Area of Interest Interim Measures Data Collection Report was submitted to KDHE and EPA in correspondence dated March 31, 2011.

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. Early spring brought evidence of thin vegetative coverage.

Actions to Rectify Problems

The SWMU-17 cap was re-seeded on March 24, 2011.

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 including use of data from the Walnut River AOI data collection activities. Shaw and WPS anticipate submittal of the HHRA to EPA and KDHE in the second quarter of 2011.
- Coordinate a project review/update meeting with EPA to present the conclusions of the RFIs and HHRA.
- Continue monthly status calls with EPA.
- Proceed with Walnut River AOI interim measures planning efforts.

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 in-


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formation 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 fluid and cursive, with the first name "Dennis" and last name "Elliott" clearly distinguishable.

Dennis Elliott

Vice President

Williams Petroleum Services, LLC

c: David Way, Shaw Environmental, Inc.