

Williams Petroleum Services, LLC

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July 6, 2011

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

Re: Quarterly Update – 2nd 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 April 1 through June 30, 2011.

Description of Activities

During the reporting period, Shaw and WPS continued development of the Human Health Risk Assessment (HHRA) for the FAR. The HHRA is currently in WPS review.

WPS solicited requests for proposal (RFP) for the Walnut River Area of Interest (AOI) Interim Measures. Proposals were received and are in review.

In support of the AOI RFP process, Shaw collected baseline samples from the AOI that included duplication of previously collected seep, groundwater, and biased surface water from Seep-07 and 08.

The vegetative cover on SWMU-17 has been established and the construction storm water permit Notice of Termination was submitted to the Kansas Department of Health and Environment (KDHE).

Initiated plans for completion of a site-wide groundwater monitoring event.

Summary of All Findings

Data from the AOI baseline sampling is presented in the attached Table 1 (including the historic same location results).

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Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- In email dated May 2, 2011 from WPS to EPA, a clarification was requested regarding the depths of “surface soil”. In addition, WPS requested concurrence regarding the AOI conceptual site model so that Interim Measures proposal solicitation could proceed.
- In correspondence dated May 5, 2011, WPS solicited a RFP for an Interim Corrective Measure at the Walnut River AOI.
- On June 29, 2011, WPS submitted a Notice of Termination to the KDHE of the SWMU-17 Storm Water Construction Permit.

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:

- Submittal of the HHRA including use of data from the Walnut River AOI data collection activities.
- Coordinate a project review/update meeting with EPA to present the conclusions of the RFIs and HHRA.
- Continue status calls with EPA.
- Proceed with Walnut River AOI interim measures implementation 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

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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



Dennis Elliott

Vice President

Williams Petroleum Services, LLC

attachment

c: David Way, Shaw Environmental, Inc.

Table 1
River Surface Water Sampling Locations and
Potential Hydrocarbon Seep Sampling Locations
Summary of Groundwater Analytical Results
Above EPA Regional Screening Levels for Tap Water
Former Augusta Refinery, Augusta, KS

PERIOD: From 10/08/2008 thru 05/17/2011 - Inclusive
SAMPLE TYPE: Water

SITE	DATE	RESULT TYPE	1,1,1-trichloro ethane (ug/l)	1,1-Dichloro ethane (ug/l)	1,1-Dichloro ethylene (ug/l)	Acetone (ug/l)	Benzene (ug/l)	Carbon disulfide (ug/l)
EPA RSL-Tap Water								
SEEP-07	11/19/2008	Prim	<0.47	<0.41	<0.48	<3.3*	63.8	<0.51
SEEP-07	05/17/2011	Prim	<0.62	<0.52	<0.50	<4.7	<0.50	<0.53
SEEP-07 SW	11/05/2008	Prim	<0.47	<0.41	<0.48	[4.0]	7.2	<0.51
SEEP-07 SW	05/05/2011	Prim	<0.62	<0.52	<0.50	<4.7	<0.50	<0.53
SEEP-08	11/19/2008	Prim	<0.47	<0.41	<0.48	<13.2*	428	<0.51
SEEP-08	05/17/2011	Prim	<0.62	<0.52	<0.50	<4.7	<0.50	<0.53
SEEP-08 SW	11/05/2008	Prim	<0.47	<0.41	<0.48	[3.5]	7.5	<0.51
SEEP-08 SW	05/05/2011	Prim	<0.62	<0.52	<0.50	<4.7	7.4D	<0.53
SEEP-08 SW	05/05/2011	Dup1	<0.62	<0.52	<0.50	<4.7	3.4D	<0.53
TMP-07	10/08/2008	Prim	<0.47	<0.41	<0.48	<2.6	290	<0.51
TMP-07	05/05/2011	Prim	<0.62	<0.52	<0.50	[39.0]	269	<0.53
TMP-07	05/17/2011	Prim	---	---	---	---	---	---
TMP-08	10/08/2008	Prim	<0.47	<0.41	<0.48	<2.6	366	<0.51
TMP-08	05/05/2011	Prim	<0.62	<0.52	<0.50	[40.5]	276	<0.53
TMP-08	05/17/2011	Prim	---	---	---	---	---	---

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SAMPLE TYPE: Water

SITE	DATE	RESULT TYPE	Chlorobenzene (ug/l)	Ethylbenzene (ug/l)	MTBE (ug/l)	Methylene chloride (ug/l)	Tetrachloro ethylene (ug/l)	Toluene (ug/l)
EPA RSL-Tap Water			91	1.5	12	4.8	0.11	2300
SEEP-07	11/19/2008	Prim	<0.42	<0.45	<0.26	<0.41	<0.50	<0.66*
SEEP-07	05/17/2011	Prim	<0.56	<0.55	<0.73	<0.41	<0.91	<0.43
SEEP-07 SW	11/05/2008	Prim	<0.42	<0.45	<0.26	<0.41	<0.50	<0.48
SEEP-07 SW	05/05/2011	Prim	<0.56	<0.55	<0.73	<0.41	<0.91	<0.43
SEEP-08	11/19/2008	Prim	<0.42	[0.83]	<0.26	[1.2]	<0.50	3.7
SEEP-08	05/17/2011	Prim	<0.56	<0.55	<0.73	<0.41	<0.91	<0.43
SEEP-08 SW	11/05/2008	Prim	<0.42	<0.45	<0.26	<0.41	<0.50	<0.48
SEEP-08 SW	05/05/2011	Prim	<0.56	<0.55	<0.73	<0.41	<0.91	<0.43
SEEP-08 SW	05/05/2011	Dup1	<0.56	<0.55	<0.73	<0.41	<0.91	<0.43
TMP-07	10/08/2008	Prim	<0.42	[1.0]	<0.26	<0.41	<0.50	3.6
TMP-07	05/05/2011	Prim	<0.56	[1.4]	<0.73	<0.41	<0.91	3.2
TMP-07	05/17/2011	Prim	---	---	---	---	---	---
TMP-08	10/08/2008	Prim	<0.42	[1.8]	<0.26	<0.41	<0.50	6.2
TMP-08	05/05/2011	Prim	<0.56	[1.2]	<0.73	<0.41	<0.91	4.8
TMP-08	05/17/2011	Prim	---	---	---	---	---	---

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SAMPLE TYPE: Water

SITE	DATE	RESULT TYPE	Vinyl chloride (ug/l)	Xylene (total) (ug/l)	2-Methyl naphthalene (ug/l)	Benzoic acid (ug/l)	Bis(2-ethyl hexyl)phthalate (BEHP) (ug/l)	Chrysene (ug/l)
EPA RSL-Tap Water			0.016	200	150	150000	4.8	2.9
SEEP-07	11/19/2008	Prim	<0.42	<1.4	<1.9	<0.53	[1.5]	<1.2
SEEP-07	05/17/2011	Prim	<1.0	<1.7	<1.4	<5.4	<1.9	<1.1
SEEP-07 SW	11/05/2008	Prim	<0.42	<1.4	<2.5	<0.72	<1.9	<1.6
SEEP-07 SW	05/05/2011	Prim	<1.0	<1.7	<1.4	<5.5	<1.9	<1.1
SEEP-08	11/19/2008	Prim	<0.42	6.6	[2.7]	<0.53	<1.4	<1.2
SEEP-08	05/17/2011	Prim	<1.0	<1.7	<1.3	<5.2	<1.8	<1.0
SEEP-08 SW	11/05/2008	Prim	<0.42	<1.4	[2.8]	<0.68	<1.7	<1.5
SEEP-08 SW	05/05/2011	Prim	<1.0	<1.7	<1.5	<5.7	<2.0	<1.1
SEEP-08 SW	05/05/2011	Dup1	<1.0	<1.7	<1.4	<5.6	<2.0	<1.1
TMP-07	10/08/2008	Prim	<0.42	9.0	58.9	<0.58	<1.5	<1.3
TMP-07	05/05/2011	Prim	<1.0	11.3	---	---	---	---
TMP-07	05/17/2011	Prim	---	---	114	<5.2	<1.9	<1.0
TMP-08	10/08/2008	Prim	<0.42	12.9	137	<1.2	<3.0	<2.6
TMP-08	05/05/2011	Prim	<1.0	10.2	---	---	---	---
TMP-08	05/17/2011	Prim	---	---	88.9	<5.2	<2.7*	<1.0

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SITE	DATE	RESULT TYPE	Naphthalene (ug/l)	Phenanthrene (ug/l)	Pyrene (ug/l)	Arsenic (ug/l)	Dissolved Arsenic (ug/l)	Barium (ug/l)
EPA RSL-Tap Water			0.14		1100	0.045	0.045	7300
SEEP-07	11/19/2008	Prim	<1.3	<1.5	<1.0	---	12.9	---
SEEP-07	05/17/2011	Prim	<1.2	<1.1	<1.8	---	1.6	---
SEEP-07 SW	11/05/2008	Prim	<1.8	<2.0	<1.4	2.9	---	206
SEEP-07 SW	05/05/2011	Prim	<1.2	<1.1	<1.8	2.8	2.4	[162]
SEEP-08	11/19/2008	Prim	<1.3	<1.5	<1.0	---	214	---
SEEP-08	05/17/2011	Prim	<1.2	<1.0	<1.7	---	1.5	---
SEEP-08 SW	11/05/2008	Prim	<1.7	<1.8	<1.3	4.4	---	227
SEEP-08 SW	05/05/2011	Prim	<1.3	<1.1	<1.9	4.5D	4.2	[180]
SEEP-08 SW	05/05/2011	Dup1	<1.3	<1.1	<1.9	6.8D	5.4	[188]
TMP-07	10/08/2008	Prim	<1.5	<1.6	<1.1	106	54.8	1170
TMP-07	05/05/2011	Prim	---	---	---	---	---	1260
TMP-07	05/17/2011	Prim	12.7	[2.6]	<1.7	42.8	11.3	---
TMP-08	10/08/2008	Prim	<2.9	[4.5]	<2.3	127	29.1	1280
TMP-08	05/05/2011	Prim	---	---	---	---	---	1430
TMP-08	05/17/2011	Prim	<1.2	[2.8]	<1.7	163	3.4	---

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SITE	DATE	RESULT TYPE	Dissolved Barium (ug/l)	Cadmium (ug/l)	Dissolved Cadmium (ug/l)	Chromium (ug/l)	Dissolved Chromium (ug/l)	Lead (ug/l)
EPA RSL-Tap Water			7300	18	18			
SEEP-07	11/19/2008	Prim	221	---	<4.0	---	<10	---
SEEP-07	05/17/2011	Prim	220	---	<0.30	---	<1.9	---
SEEP-07 SW	11/05/2008	Prim	---	<0.30	---	[2.0]	---	<1.7
SEEP-07 SW	05/05/2011	Prim	[146]	<0.30	<0.090	<1.9	<0.27	<1.7
SEEP-08	11/19/2008	Prim	1270	---	<4.0	---	<10	---
SEEP-08	05/17/2011	Prim	[107]	---	<0.30	---	<1.9	---
SEEP-08 SW	11/05/2008	Prim	---	<0.30	---	<1.9	---	<1.7
SEEP-08 SW	05/05/2011	Prim	[169]	<0.30	[0.21]	<1.9	<0.27	<1.7
SEEP-08 SW	05/05/2011	Dup1	[168]	<0.30	[0.090]	<1.9	[0.57]	[1.7]
TMP-07	10/08/2008	Prim	979	[2.0]	<0.30	24.2	<1.9	10.9
TMP-07	05/05/2011	Prim	906	[1.4]	[0.25]	21.6	[1.6]	14.0
TMP-07	05/17/2011	Prim	---	---	---	---	---	---
TMP-08	10/08/2008	Prim	4940	[1.6]	<1.5	15.7	<10	10.4
TMP-08	05/05/2011	Prim	989	[1.9]	[0.28]	37.9	[1.2]	21.3
TMP-08	05/17/2011	Prim	---	---	---	---	---	---

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SITE	DATE	RESULT TYPE	Dissolved Lead (ug/l)	Mercury (ug/l)	Dissolved Mercury (ug/l)	Selenium (ug/l)	Dissolved Selenium (ug/l)	Silver (ug/l)
EPA RSL-Tap Water				0.57	0.57	180	180	180
SEEP-07	11/19/2008	Prim	<3.0	---	<0.094	---	<5.0	---
SEEP-07	05/17/2011	Prim	<1.7	---	1.8	---	<3.2	---
SEEP-07 SW	11/05/2008	Prim	---	<0.094	---	<3.2	---	<0.80
SEEP-07 SW	05/05/2011	Prim	<1.8	<0.050	<0.050	<3.2	[1.8]	<0.80
SEEP-08	11/19/2008	Prim	<3.0	---	<0.094	---	<5.0	---
SEEP-08	05/17/2011	Prim	[1.8]	---	1.1	---	<3.2	---
SEEP-08 SW	11/05/2008	Prim	---	<0.094	---	<3.2	---	<0.80
SEEP-08 SW	05/05/2011	Prim	<1.8	<0.050	<0.050	<3.2	[2.2]	<0.80
SEEP-08 SW	05/05/2011	Dup1	<1.8	<0.050	<0.050	<3.2	[2.8]	<0.80
TMP-07	10/08/2008	Prim	[1.7]	0.24	<0.094	<3.2	<3.2	[0.90]
TMP-07	05/05/2011	Prim	6.6	<0.050	<0.050	<3.2	[2.7]	<0.80
TMP-07	05/17/2011	Prim	---	---	---	---	---	---
TMP-08	10/08/2008	Prim	<8.5	<0.094	<0.094	<3.2	<16	<0.80
TMP-08	05/05/2011	Prim	6.2	<0.050	<0.050	<3.2	[3.5]	<0.80
TMP-08	05/17/2011	Prim	---	---	---	---	---	---

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SAMPLE TYPE: Water

SITE	DATE	RESULT TYPE	Dissolved Silver (ug/l)
EPA RSL-Tap Water			180
SEEP-07	11/19/2008	Prim	<10
SEEP-07	05/17/2011	Prim	<0.80
SEEP-07 SW	11/05/2008	Prim	---
SEEP-07 SW	05/05/2011	Prim	<0.24
SEEP-08	11/19/2008	Prim	<10
SEEP-08	05/17/2011	Prim	<0.80
SEEP-08 SW	11/05/2008	Prim	---
SEEP-08 SW	05/05/2011	Prim	[0.71]
SEEP-08 SW	05/05/2011	Dup1	[0.54]
TMP-07	10/08/2008	Prim	<0.80
TMP-07	05/05/2011	Prim	[0.71]
TMP-07	05/17/2011	Prim	---
TMP-08	10/08/2008	Prim	[4.1]
TMP-08	05/05/2011	Prim	[0.74]
TMP-08	05/17/2011	Prim	---
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