

Williams Petroleum Services, LLC

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October 4, 2011

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

Re: Quarterly Update – 3rd 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 July 1 through September 30, 2011.

Description of Activities

In correspondence dated July 28, 2011, Shaw submitted a revised sampling and analysis plan (SAP) to complete a groundwater monitoring event at the FAR. Per the SAP, the groundwater monitoring event was completed during the month of August.

In August, 2011, WPS received and reviewed proposals for implementation of an Interim Corrective Measure at the Walnut River Area of Interest. Burns and McDonnell has tentatively been selected as the implementation contractor. WPS is currently meeting with land owners upon which the interim corrective measure would be located. It is WPS intention to submit a proposed conceptual design and schedule for the Interim Corrective Measure to EPA in November for review.

In correspondence dated September 9, 2011, WPS received final approval from KDHE for the SWMU-17 Interim Measures project.

In correspondence dated September 22, 2011, the Human Health Risk Assessment (HHRA) for the FAR was submitted to EPA. This report represents a culmination of all the RFI data collection through assessment of the associated risks.

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Summary of All Findings

Final quality control review of groundwater monitoring results has not been completed. Therefore, no final data has been generated for summary.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- In correspondence dated July 28, 2011, Shaw submitted a revised sampling and analysis plan (SAP) to complete a groundwater monitoring event at the FAR.
- In correspondence dated September 9, 2011, WPS received final approval from KDHE for the SWMU-17 Interim Measures project.

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:

- Coordinate a project review/update meeting with EPA to present the conclusions of the RFIs and HHRA.
- During the RFI and as outlined in the Order, total chromium analysis was performed on the surface and subsurface soil samples collected. However, as part of the HHRA, EPA required total chromium concentrations to be assessed as hexavalent chromium in certain portions of the FAR potentially affected by cooling tower operations. This assumption was outlined as a significant uncertainty in the HHRA. To address this uncertainty, Shaw intends to submit a SAP for surface soil sampling and hexavalent chromium analysis.
- During the RFI, limited sampling and analysis was performed on the Kansas Military Museum property. These data limitations were noted in the HHRA as an uncertainty. To address this uncertainty, Shaw intends to submit a SAP for soil sampling on the Kansas Military Museum property.
- Re-initiate status calls with EPA.
- Submit a SAP for Walnut River surface water sampling over the next two years.

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- Submit a proposed conceptual design and schedule for the Interim Corrective Measure for the Walnut River Area of Interest.

Other Relevant Documentation

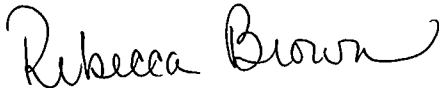
None

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.

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



Rebecca Brown

Interim Director

Williams EH&S

c: David Way, Shaw Environmental, Inc.
John Cook, KDHE
Ryan Pfeiffer, KDHE