

Williams Petroleum Services, LLC

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January 11, 2012

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

Re: Quarterly Update – 4th 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 October 1 through December 31, 2011.

Description of Activities

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, on November 9, 2011, Shaw submitted a sampling and analysis plan (SAP) to EPA for additional characterization of hexavalent chromium in soil. The objective of this sampling event was to confirm or deny the presence of hexavalent chromium for risk assessment purposes. In December 2011, this soil sampling was completed and laboratory analyses are pending.

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, on November 9, 2011, Shaw submitted a SAP to EPA for additional soil characterization at the Kansas Military Museum property on the eastern edge of the FAR. In December 2011, these sampling activities were completed and laboratory analyses are pending.

On November 9, 2011, Shaw submitted a revised SAP for surface water monitoring of the Walnut River. Scope initiation is anticipated in 2012 pending EPA approval of the SAP.

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On November 17, 2011, a project status call was held with EPA and KDHE.

During the August groundwater sampling event, groundwater levels were significantly down causing several wells to be dry during the event. This included FAR 09-03s adjacent to the Phelps property. Because this particular well was dry, the decision was made to install another sentinel well to the north/northwest of the Property. This well was installed and sampled in December. Analytical results are pending from the laboratory. In addition, the north Phelps Lawn and Garden well was purged and sampled and analytical results are also pending from the laboratory.

Since submittal of the Human Health Risk Assessment (HHRA) for the FAR to EPA, Shaw has worked with EPA to facilitate review of the HHRA document.

Summary of All Findings

Final quality control review of soil sampling results has not been completed. Therefore, no final data has been generated for summary. Other groundwater data is pending receipt from the laboratory.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- In correspondence dated November 9, 2011, Shaw submitted a SAP to EPA for additional characterization of hexavalent chromium in soil.
- In correspondence dated November 9, 2011, Shaw submitted a SAP to EPA for additional soil characterization at the Kansas Military Museum property on the eastern edge of the FAR.
- In correspondence dated November 9, 2011, Shaw submitted a revised SAP for surface water monitoring of the Walnut River.
- In correspondence dated December 14, 2011, Shaw submitted electronic ProUCL output files to EPA in support of the HHRA review.

Summaries of Problems Encountered

None.

Actions to Rectify Problems

None.

Changes in Key Project Entities

None

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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.
- Initiate the Walnut River surface water sampling scope of work pending EPA approval of the SAP.
- Submit the 2011 Groundwater Monitoring Report to EPA.
- Submit a proposed conceptual design and schedule for the Interim Corrective Measures 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.