## Williams Petroleum Services, LLC

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January 7, 2014

Mr. Kenneth Herstowski, P.E. Environmental Protection Agency, Region 7 AWMD/WRAP/MIRP 11201 Renner Boulevard Lenexa, Kansas 66219

Re: Quarterly Update – 4th Quarter 2013
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 (FAR) 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, 2013.

## Description of Activities

- In correspondence dated October 3, 2013, submitted a Work Plan to KDHE and USEPA for additional asphalt stabilization at SWMU-17.
- In correspondence dated October 17, 2013, submitted a Work Plan to USEPA for plugging/abandoning/completing certain temporary monitoring wells installed at the FAR during the RFI.
- Initiated and completed the groundwater monitoring event per the plan dated September 23, 2013.
- Initiated the Water Balance scope through installation of transducers per the September 11, 2013 scope of work.
- Initiated the LNAPL scope during the quarterly monitoring activities per the September 11, 2013 scope of work.
- In correspondence dated November 13, 2013, Burns & McDonnell submitted a Work Plan to KDHE and USEPA for a targeted excavation to support a City of Augusta Drainage Improvement project located within the Walnut River AOI.
- The targeted excavation Work Plan was approved by USEPA on November 25, 2013.

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- Burns & McDonnell initiated field work to complete a targeted excavation to support a City of Augusta Drainage Improvement project located within the Walnut River AOI per the November 14, 2013 Work Plan.
- In correspondence dated December 6, 2013, KDHE provided contingent approval for the SWMU-17 scope of work.

Summary of All Findings

None.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- On October 7, 2013, WPS submitted the 3rd quarter 2013 update to EPA.
- On October 28, 2013, Ms. Carrie Ridley of the KDHE visited the site to observe groundwater monitoring activities.
- During the quarter, CB&I initiated communications with USEPA regarding the HHRA Addendum.
- During the quarter, Burns & McDonnell initiated communications and received approval from KDHE and USEPA of a Work Plan for a targeted excavation to support a City of Augusta Drainage Improvement 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:

- Bring resolution to submittal of an HHRA Addendum to address the additional data collection activities such that work can advance to the CMS.
- Complete reporting of the 2013 groundwater monitoring event.
- Continue work on the LNAPL monitoring evaluation for the CMS.
- Continue work on the water balance evaluation for the CMS.
- Plug and abandon temporary shallow monitor wells installed as part of the RFI field activities.

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- Initiate additional asphalt stabilization north of the SWMU 17 cap.
- Submit a Work Plan to USEPA for the Walnut River AOI Interim Corrective Measure.

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. John Carey, III with Williams Petroleum Services, LLC. If you have any questions, do not hesitate to contact Mr. Carey at (918) 573-8215.

Sincerely,

Williams Petroleum Services, LLC

Mark A. Gebbia

Manager, Environmental Services CoE

cc: David Way, Shaw Environmental, Inc. (a CB&I Company)