

## Williams Petroleum Services, LLC

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April 7, 2014

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

Re: Quarterly Update – 1st Quarter 2014  
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 January 1 through March 31, 2014.

### *Description of Activities*

- During the weeks of March 10 and 17, 2014, completed the additional asphalt stabilization at SWMU-17 in accordance with the KDHE-approved Work Plan.
- Continued the Water Balance scope through monitoring of transducers per the September 11, 2013 scope of work.
- Continued the LNAPL scope during the quarterly monitoring activities per the September 11, 2013 scope of work.

### *Summary of All Findings*

The 2013 groundwater monitoring report will be submitted to EPA in April 2014. This report will present the groundwater monitoring data along with the preliminary LNAPL monitoring results.

### *Summaries of All EPA Approved Changes*

None.

### *Summaries of All Contacts*

- On January 7, 2014, WPS submitted the 4th quarter 2013 update to EPA.

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- In email correspondence dated January 17, 2014, EPA provided recommendations for additional wells to be retained for completion in accordance with the plugging/abandonment/completion scope of work.
- In email correspondence dated January 17, 2014, KDHE provided notification that Mr. Sam Sunderraj would be taking over the SWMU-17 oversight from Mr. Kelly Warren.
- In email correspondence dated January 30, 2014, KDHE provided concurrence to the GCL liner scope changes for the additional asphalt stabilization at SWMU-17.
- In email correspondence dated March 12, 2014, EPA was notified that implementation of the plugging/abandoning/completing scope of work for certain temporary monitoring wells installed at the FAR during the RFI was scheduled for April 2014.
- During the quarter, CB&I continued communications with USEPA regarding the HHRA Addendum.

### *Summaries of Problems Encountered*

During the groundwater monitoring event, wells previously identified in the plug/abandon/completion scope of work to be completed were found as damaged.

### *Actions to Rectify Problems*

A full well inventory was completed during the groundwater monitoring event. A revised plug/abandonment/completion scope of work will be submitted to EPA in April 2014 with lists reconciling wells to be abandoned or replaced.

### *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.
- Continue work on the Walnut River AOI Interim Corrective Measures.

### *Other Relevant Documentation*

None

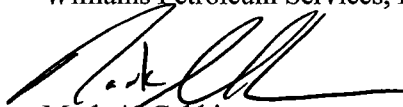
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I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal 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

c: David Way, CB&I Environmental & Infrastructure, Inc.