

## Williams Petroleum Services, LLC

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September 1, 2009

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

Re: Quarterly Update – 2<sup>nd</sup> Quarter 2009  
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, 2009.

### *Description of Activities*

A draft RFI Site Characterization Report For Soil is currently undergoing internal review prior to submittal to EPA. A draft RFI Site Characterization Report For Groundwater is currently being compiled. Final results and analysis for both on-site and off-site environmental media will be presented in two final reports scheduled for submittal to EPA later this year. The first RFI report will address soil and sediment contamination while the second report will characterize overall impacts to groundwater.

In a letter dated April 24, 2009, EPA was provided (copy to KDHE) information on the following topics:

- Off-site Groundwater and Walnut River Sampling Data;
- Environmental Indicator (EI) Determination – Migration of Contaminated Groundwater Under Control; and
- Interim Action for Walnut River Potential Hydrocarbon Seeps.

A review of the off-site groundwater and Walnut River vicinity data was presented to EPA and KDHE on June 4, 2009 via conference call. A PowerPoint presentation was used to summarize the findings of off-site sampling performed east and southeast of the FAR including off-site groundwater, potential hydrocarbon seeps, river bank soil, and river surface water.

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Three (3) additional off-site shallow monitor wells were installed during the week of May 18, 2009. The wells were installed to obtain groundwater samples for screening prior to implementation of the Off-site Soil Gas Sampling and Analysis Plan (SAP).

Three damaged temporary shallow monitor wells were pulled and plugged. They included monitor wells SWMU-10A, SWMU-11A, and SWMU-11B.

Upcoming planned activities associated with off-site areas include evaluation of soil gas and design of a remedial measure to address potential hydrocarbon seeps at the Walnut River. A soil gas Sampling and Analysis Plan for off-site areas was prepared and will be implemented during the first week of July.

### *Summary of All Findings*

A compilation of recent off-site groundwater data and data from sampling in the vicinity of the Walnut River was prepared for submittal to EPA during the reporting period (letter dated April 24, 2009). The summary of findings included results for off-site groundwater, potential hydrocarbon seep and Walnut River surface water, and river bank surface soil sampling.

### *Summaries of All EPA Approved Changes*

None

### *Summaries of All Contacts*

- April 24, the off-site data summary letter was forwarded to EPA with a copy to KDHE.
- May 14, Off-site Soil Gas SAP was forwarded to EPA for review.
- May 20, EPA forwarded review comments for the off-site data summary (letter dated April 24, 2009).
- June 4, EPA, KDHE, WPS, ExxonMobil and Shaw representatives met via conference call to review off-site sampling data.

### *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:

- Implementation of the Off-Site Soil Gas SAP
- Continued preparation of the HHRA
- Continued preparation of the groundwater characterization report

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- Submittal of responses to EPA comments on the off-site data summary letter

In a letter dated March 3, 2008 addressed to Mr. John Cook of the KDHE Bureau of Environmental Remediation, WPS indicated that a design for a phased interim action to address light non-aqueous phase liquids (LNAPL) and potential hydrocarbon seeps along the Walnut River would be forthcoming. Requisite to the development of this design was the completion of the groundwater and river investigations and evaluation of related data. Compilation and review of this data with EPA, KDHE, and ExxonMobil has deferred the presentation of a conceptual design for the interim action to the fourth quarter of the current calendar year.

### *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



Dennis Elliot

Vice President

Williams Petroleum Services, LLC

c: Mark deLorimier, Shaw Environmental, Inc.