

Williams Petroleum Services, LLC

One Williams Center
P.O. Box 3483
Tulsa, OK 74101-3483
918/573-2600

October 20, 2008

Mr. Kenneth Herstowski
Environmental Protection Agency
901 N. Fifth Street
Kansas City, Kansas 66101

Re: Quarterly Update – 3rd Quarter 2008
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, 2008.

Description of Activities

Field activities for implementation of the Groundwater Sampling and Analysis Plan (SAP) dated April 29, 2008 were initiated during the week of August 4, 2008. Field activities completed include the following:

- Installation and development of three (3) new shallow monitor wells in the silty clay unit, twenty five (25) additional deep monitor wells in the silty sand unit, and one (1) temporary limestone bedrock monitor well.
- Initiation of groundwater sampling of the new and existing monitor wells as outlined in the SAP.
- Setting of four (4) river gauging stadia rods.
- Gauging the depth of river in areas of the proposed temporary river bank monitor points.
- Installation of the nine (9) temporary river bank monitor points.
- Elevation and location survey of the new monitor wells and river bank stadia rods.

The Human Health Risk Assessment (HHRA) Work Plan, SAP for River Bank Soil, and Background Evaluation Report were all submitted to EPA during the previous reporting period. The purpose of the Background Evaluation Report is to describe the background sampling activities that have been performed to date and to establish the background data sets to be used in the RCRA Facility Investigation (RFI). EPA forwarded draft comments on the HHRA Work Plan and River Bank Soil SAP on September 4, 2008. A response to comments will be prepared and submitted during the subsequent reporting period.

Williams Petroleum Services, LLC

A walk of the Walnut River bank was conducted on August 28, 2008 to identify potential seep area and related sampling locations. Mr. Dan Nicoski representing EPA Region 7 participated in the identification of locations to be sampled.

Summary of All Findings

None

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

- August 6, responses to EPA comments on the Groundwater and River Bank Soil SAPs were submitted to EPA. At EPA's suggestion two (2) additional monitor wells (one shallow and one deep) were installed during implementation of the GW SAP. Existing monitor well D-38 was also added to the list of those to be sampled.
- August 7, a tentative schedule of Groundwater and River Bank field activities was forwarded to EPA and KDEHE to facilitate site visits if desired.
- August 21, EPA was notified of the tentative date for the Walnut River bank walk for the identification of potential seeps.
- August 25, Dan Nicoski with EPA Region 7 contacted WPS' contractor to arrange for participation in the planned walk of the Walnut River bank for identification of potential seeps and sampling locations.

Summaries of Problems Encountered

Heavy rains on September 11 and 12, 2008 caused surface water and river flooding at the site and surrounding area. Flooding of the Walnut River destroyed four (4) of the temporary river bank points that had been installed. Surface water flooding of SWMU 3, AOC D, and the background area has delayed groundwater sampling of monitor wells in these units.

Actions to Rectify Problems

The four (4) temporary monitor points will be pulled and the borings plugged with granular ben-tonite. Four (4) new temporary monitor points will be reinstalled adjacent to the former locations for sampling. Sampling of the temporary monitor points and installation of the seep samplers will only occur while the Walnut River flow is at or below normal flow rates (at or below 55 cubic feet per second).

The remaining monitor wells will be sampled when the respective units are dry enough to allow groundwater sampling to be completed.

Changes in key project entities

None

Williams Petroleum Services, LLC

Projected Work for the Next Reporting Period

Field investigations for the following units will be performed or initiated during the next reporting period:

- Continued implementation of Groundwater and River Bank Soil SAPs.

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

cc: Mark deLorimier, Shaw Environmental, Inc.