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October 30, 2006

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

RE: Quarterly Update – 3rd Quarter 2006
Williams Former Augusta Refinery RCRA Facility Investigation (RFI), 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, 2006.

Description of Activities

- The following field activities were completed during the quarter:
- On July 20 and 21, 2006, completed soil sampling and installation of temporary monitor wells at SWMU 12.
- On August 2, 2006, completed well development activities for the temporary monitor wells at SWMU 12.
- On August 10, 2006, completed groundwater sampling of temporary monitor wells at SWMU 12.
- Bi-monthly sampling of temporary groundwater monitor wells installed at the background area was performed in accordance with the respective Sampling and Analysis Plan. Background groundwater sampling was completed on August 9, 2006.
- The disposal of non-hazardous decontamination, purge, and development water occurred on August 24, 2006 via discharge to the City of Wichita POTW.
- On August 24, 2006, survey activities for boring and temporary monitor well locations at SWMU 12 were completed.
- On August 31 through September 8, 2006, field activities were completed to contain, mitigate migration, and cover visible asphalt on the surface at SWMU 17.

- On September 26, 2006 select drums of soil were sampled for disposal characterization and soil sampling locations staked at AOC 1 for preparation of the next investigative field activities at the site.

Summary of All Findings

An investigation progress summary for PA-1, SWMU 3, SWMU 4, and SWMU 12 is included as Table 1.

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

On July 21, 2006, EPA approval of the SWMU 12 SAP was received via e-mail.

On July 27, 2006, submitted SWMU 8, 9, and 17 SAP for review and approval.

On August 24, 2006, submitted AOC 1 and SWMU 14 SAP for review and approval.

On August 29, 2006, a proposed scope of work was submitted via e-mail to the EPA to contain migration and deter further migration of asphalt at SWMU 17.

On September 26, 2006, EPA approval of the AOC 1 and SWMU 16 SAP was received via e-mail.

Summaries of Problems Encountered

None

Actions to Rectify Problems

None

Changes in key project entities

None

Projected Work for the Next Reporting Period

SAPs for the following units will be developed during the forth quarter of 2006 for subsequent submittal to EPA:

SWMU 10, 11, 13, and 14 – Effluent Oxidation Pond, Rainfall Runoff Storage Pond, Oil Skimming Pond, and Levee Pond respectively
AOC 5 – Leaded Tank Bottom Disposal Areas
AOC A – Oil Collection Pond
AOC B – Former Landfill North of Effluent Oxidation Pond
AOC C – Former Pond Areas
AOC D – Asphaltic Material Disposal Area
AOC E – Sludge Pond

AOC F – Surface Staining
AOC G – Liquid Fuel Burning Facility Area
Groundwater – Site-wide

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

AOC 1 and SWMU 16 – Surface Drainage Ditches and Oily water Sewer System
SWMU 17 – Asphalt Landfill
SWMUs 8 and 9 – East Landfill and Industrial Landfill
Process Areas 2 and 3
SWMU 10, 11, 13, and 14 – Effluent Oxidation Pond, Rainfall Runoff Storage Pond, Oil Skimming Pond, and Levee Pond respectively
AOC 5 – Leaded Tank Bottom Disposal Areas

Complete additional field investigation activities at SWMU 15 and AOCs 4 and 6 as summarized in the technical memorandum.

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

Paul V. Hunter
Vice President

enclosures

c: Mark deLorimier, Shaw Environmental, Inc.
David Way, Shaw Environmental, Inc.

Table 1. RCRA Facility Investigation Progress Summary, Former Augusta Refinery, Augusta, Kansas
Quarterly Status Report: 3rd Quarter 2006

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
SWMU 3	5/08/06 - 5/30/06	• Eleven samples were above Region 9 direct soil exposure for arsenic.	• One subsurface soil sample was above the Region 9 PRG DAF20 value for methylene chloride.	• A groundwater sample was only collected from temporary monitoring well SWMU 3-09. Temporary monitoring wells SWMU 3-03 and SWMU 3-06 were dry at completion.	• A comparison of arsenic data to background levels in groundwater will be performed after one year's worth of background quality data is collected.
Total Samples Collected: Eleven Surface Samples, Nine Subsurface Samples, and One Groundwater Sample.		• Eleven surface samples were also above the 95 percent UCL of the mean background concentration for arsenic[1].		• Total and dissolved arsenic concentrations were above Region 9 PRG for tap water value and the MCL in the one temporary well.	• Data evaluation of surface soil arsenic results is deferred until the background data set can be re-evaluated[1].
		• Six samples were above Region 9 direct soil exposure for organic lead.			• Methylene chloride will be retained as a COPC for this Unit during investigation of groundwater as a Unit.
					• Additional sampling for organic lead data in surface soil will be completed.
					• Additional statistical evaluation of organic lead following collection of additional surface samples.
					• Groundwater data will be used for consideration of additional well placement when the groundwater is investigated site wide.

[1] A change in analytical methodology occured between the first phase and second phase of field activities due to a switch in analytical laboratories. The switch resulted in a change in analytical methodology from graphite furnace atomic absorption (AA) method for the analysis of arsenic, cadmium and selenium in soil, to using inductively-coupled plasma atomic emission spectrometry (ICP). Evaluation of the arsenic anlytical results for the background data collected during the first phase compared to the second phase arsenic analytical results for each of the Units indicates that the arsenic results for soil are statistically different between the two phases of work. In order to determine if the statistical difference is due to the change in analytical methodology, the background dataset for arsenic, cadmium, and selenium in soil will be re-sampled with subsequent analysis by ICP. The background dataset will then be re-evaluated.

Table 1. RCRA Facility Investigation Progress Summary, Former Augusta Refinery, Augusta, Kansas
Quarterly Status Report: 3rd Quarter 2006

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
SWMU 4	5/18/2006 - 5/31/06	• Ten surface samples were above Region 9 direct soil exposure for arsenic.	• Two subsurface soil samples were above Region 9 PRG DAF1 value for benzene[2].	• Total and dissolved arsenic concentrations were above Region 9 PRG for Tap Water in all three temporary wells.	• Data evaluation of surface soil arsenic results is deferred until the background data set can be re-evaluated[1].
Total Samples Collected: Ten Surface Samples, Ten Subsurface Samples, and Three Groundwater Sample.		• Ten surface samples were also above the 95 percent UCL of the mean background concentration for arsenic[1].	• Four subsurface soil samples were above the Region 9 PRG DAF20 value for chromium.	• Total and dissolved arsenic concentrations for SWMU 4-06 were above the MCL.	• Additional sampling will be completed for organic lead and phenanthrene data in surface soil.
		• Five boring locations had organic lead concentration above Region 9 PRG direct soil exposure value.		• SWMU 4-06 had benzene concentrations above Region 9 PRG for tap water value and the MCL.	• Additional statistical evaluation of organic lead and phenanthrene data following collection of additional surface samples.
		• One boring locations had phenanthrene concentration above Region 9 PRG direct soil exposure value.			• A comparison of arsenic data to background levels will be performed after one year's worth of background quality data is collected.
		• Two boring locations had benzene above the Region 9 PRG DAF1 value[2].			• Benzene will be retained as a COPC for this Unit during investigation of groundwater as a Unit.
					• Chromium will be retained as a COPC for the Unit during the investigation of the groundwater as a Unit.
					• A comparison of arsenic data to background levels will be performed after one year's worth of background quality data is collected.
					• Groundwater data will be used for consideration of additional well placement when the groundwater is investigated site wide.

[2] Benzene was detected in the groundwater at SWMU 4 above the Region 9 PRG for tap water value and therefore benzene concentrations in surface soil were also screened against the Region 9 PRG DAF1 values.

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Quarterly Status Report: 3rd Quarter 2006

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
PA 1	5/09/06 - 5/26/06	• One boring location had organic lead concentration above Region 9 PRG direct soil exposure value.	• Seven subsurface soil samples were above Region 9 PRG DAF1 value for benzene[3].	• Total and dissolved arsenic concentrations were above Region 9 PRG for Tap Water in all fifteen temporary wells.	• Data evaluation of surface soil arsenic results is deferred until the background data set can be re-evaluated[1].
Total Samples Collected: Forty Surface Samples, Thirty-nine Subsurface Samples, and Fifteen Groundwater Samples.		• Forty surface samples were above Region 9 direct soil exposure for arsenic.	• Two subsurface soil samples were above Region 9 PRG DAF1 value for naphthalene[3].	• Ten of fifteen of the total arsenic and six of fifteen of the dissolved arsenic concentrations in the groundwater samples collected from the temporary wells at PA 1 were also above the MCL.	• Additional sampling will be completed for organic lead data in surface soil.
		• Forty surface samples were also above the 95 percent UCL of the mean background concentration for arsenic[1].	• One subsurface soil sample was above the Region 9 PRG DAF20 value for ethylbenzene.	• Five of fifteen of the temporary monitoring wells had benzene concentrations in groundwater above Region 9 PRG for tap water value and the MCL.	• Additional statistical evaluation of organic lead data following collection of additional surface samples.
			• One subsurface soil sample was above the Region 9 PRG DAF20 value for methylene chloride.	• One of the temporary monitoring wells had vinyl chloride concentrations in groundwater above Region 9 PRG for tap water value, but below the MCL.	• Benzene, ethylbenzene, methylene chloride and naphthalene will be retained as a COPC for this Unit during investigation of groundwater as a Unit.
				• One of the temporary monitoring wells had 2-methyl naphthalene concentrations in groundwater above Region 9 PRG for tap water value.	• A comparison of arsenic data to background levels will be performed after one year's worth of background quality data is collected.
				• Three of the temporary monitoring wells had naphthalene concentrations in groundwater above Region 9 PRG for tap water value.	• Groundwater data will be used for consideration of additional well placement when the groundwater is investigated site wide.

[3] Benzene and naphthalene were detected in the groundwater at PA 1 above the Region 9 PRG for tap water value and therefore benzene and naphthalene concentrations in surface soil were also screened against the Region 9 PRG DAF1 values.

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Quarterly Status Report: 3rd Quarter 2006

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
SWMU 12	7/20/05 - 8/10/06	• Three boring locations had organic lead concentration above Region 9 PRG direct soil exposure value.	• Four subsurface soil samples were above Region 9 PRG DAF1 value for benzene[4].	• Total and dissolved arsenic concentrations were above Region 9 PRG for Tap Water and the MCL in all three temporary wells.	• Data evaluation of surface soil arsenic results is deferred until the background data set can be re-evaluated[1].
Total Samples Collected: Twelve Surface Samples, Twelve Subsurface Samples, and Three Groundwater Samples.		• Twelve surface samples were above Region 9 direct soil exposure for arsenic.	• One subsurface soil sample was above the Region 9 PRG DAF20 value for methylene chloride.	• Benzene concentrations were above Region 9 PRG for Tap Water and the MCL in all three temporary wells.	• Additional sampling will be completed for organic lead data in surface soil.
		• Twelve surface samples were also above the 95 percent UCL of the mean background concentration for arsenic[1].	• One subsurface soil sample was above the Region 9 PRG DAF1 value for naphthalene[4].	• Naphthalene concentrations were above Region 9 PRG for Tap Water in two of the temporary wells.	• Additional statistical evaluation of organic lead data following collection of additional surface samples.
			• One subsurface soil sample was above the Region 9 PRG DAF1 value for xylene[4].	• Xylene concentrations were above Region 9 PRG for Tap Water in one of the temporary wells.	• Benzene, xylene, and naphthalene will be retained as a COPC for this Unit during investigation of groundwater as a Unit.
					• A comparison of groundwater arsenic data to background levels will be performed after one year's worth of background quality data is collected.
					• Groundwater data will be used for consideration of additional well placement when the groundwater is investigated site wide.

[4] Benzene, xylene, and naphthalene were detected in the groundwater at SWMU 12 above the Region 9 PRG for tap water value and therefore benzene, xylene, and naphthalene concentrations in surface soil were also screened against the Region 9 PRG DAF1 values.