

Williams Petroleum Services, LLC

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

January 18, 2010

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

Re: Quarterly Update – 4th 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 October 1 through December 31, 2009.

Description of Activities

Two lawn and garden wells located on the Phelps property southeast of the refinery were sampled on November 23, 2009. One well is located approximately 70 feet north of the Phelps residence and the second well is located approximately 40 feet south of the residence. The north well is approximately 4 feet in diameter and completed to a depth of approximately 34 feet deep below ground surface. According to the property owner, the well was hand dug prior to 1940. The south well is constructed of a 6-inch steel casing and completed to a depth of approximately 35 feet below ground surface. Only the north well is operational and periodically used for watering of trees and grass at the residence. Consistent with samples from site related monitor wells, groundwater samples from both wells were submitted for analysis of metals, VOCs and SVOCs. Analytical results showed that there were no chemicals of potential concern (COPCs) with concentrations exceeding EPA regional screening levels for tap water except for arsenic. Total arsenic was detected at an estimated concentration of 1.2 µg/L in the north well and was not detected (<0.46 µg/L) in the south well. Total arsenic concentrations in both wells were below the site-specific 95% upper confidence limit background concentration of 3.39 µg/L, and below the federal primary drinking water standard (MCL) of 10 µg/L. All analytical results for the Phelps wells will be included in the Site Characterization Report for Groundwater and the Walnut River.

Two soil gas samples were obtained from beneath the foundation of the building on the Bilson property (formerly Process Area 3) on December 9, 2009. Access holes of 3/8-inch diameter were drilled through the concrete slab of the building foundation in order to obtain the sub-slab soil gas samples via Summa canister. One sample was obtained under the west half of the building and the other from under the east half of the building. Analytical results from the sampling event showed that there were no COPCs detected in the sub-slab soil gas that exceeded EPA generic "Shallow Gas" screening levels. Results of all soil gas sampling conducted off-site of the

Williams Petroleum Services, LLC

refinery will be compiled and summarized in a separate report and integrated into the Human Health Risk Assessment (HHRA).

On November 25, 2009 WPS received proposals from three potential contractors in response to the request to design and implement a remedial action to permanently prevent the surface release of asphalt from SWMU 17 – Asphalt Landfill. Presentations of recommended actions by all three firms were subsequently scheduled for the month of December. WPS anticipates notifying the selected contractor before the end of January 2010.

Summary of All Findings

The results of all groundwater sampling are being compiled and will be presented in the RFI Site Characterization Report for Groundwater and the Walnut River and incorporated into the Human Health Risk Assessment.

The results of all soil gas sampling will be screened against the soil gas screening values derived from the USEPA's *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)* (2002a) and provided in the SAP. Results of the off-site soil gas sampling events will be presented in a separate site characterization report and incorporated into the HHRA.

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

- The results of the soil gas sampling performed in July 2009 at the Kansas Museum of Military History were forwarded to Mr. Stephen H. Cannaby from Shaw Environmental, Inc. in correspondence dated November 17, 2009.
- The results of the soil gas sampling performed in July 2009 at the City of Augusta Publically Owned Treatment Works were forwarded to Mayor Kristey Williams from Shaw Environmental, Inc. in correspondence dated November 17, 2009.
- The results of the soil gas sampling performed in July 2009 at the Bilson property were forwarded to Mr. John Bilson from Shaw Environmental, Inc. in correspondence dated November 24, 2009.
- November 24, EPA was contacted by phone and e-mail to request a conference call for the presentation of exposure areas, and to notify them that figures depicting the various 30+ areas would be delivered to EPA for review on December 1, 2009.
- December 2, EPA was contacted by phone to verify receipt of the exposure area documentation.

Summaries of Problems Encountered

None

Actions to Rectify Problems

None

Changes in key project entities

None

Williams Petroleum Services, LLC

Projected Work for the Next Reporting Period

The following activities will be performed or initiated during the next reporting period:

- Continued preparation of the HHRA
- Continued preparation of the groundwater characterization report
- Award of the interim remedial action at SWMU 17.

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 Elliott

Vice President

Williams Petroleum Services, LLC

c: Mark deLorimier, Shaw Environmental, Inc.