

Williams Petroleum Services, LLC

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January 26, 2009

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

Re: Quarterly Update – 4th 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 October 1 through December 31, 2008.

Description of Activities

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

- Sampling of final groundwater monitor wells identified in the SAP.
- Installation, groundwater sampling, and plugging of the temporary river bank monitor points.
- Assembly and installation of diffuse samplers at potential seep locations along the Walnut River.
- Completion of pneumatic slug testing of groundwater monitor wells as identified in the SAP.
- Recovery of diffuse samplers and submittal of samples for analyses.
- Sampling of Walnut River surface water and surface soil at and adjacent to potential seep locations and temporary monitor points.

EPA forwarded draft comments on the HHRA Work Plan and River Bank Soil SAP on September 4, 2008. A response to comments was prepared and submitted during this reporting period and a meeting with EPA was requested for the first quarter of 2009 to discuss comment responses and finalize the Work Plan.

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Summary of All Findings

A compilation of recent off-site groundwater data and data from sampling at the Walnut River will be prepared and submitted to EPA during the next quarter.

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

- December 4, responses to EPA comments on the HHRA Work Plan were submitted to EPA. The submittal letter also requested a meeting among pertinent parties to discuss and finalize the work plan so to allow for completion of the risk assessment and its incorporation into the RFI report.
- December 11, follow up e-mail communication was forwarded to EPA reiterating the request for a meeting in Kansas City in early January, 2009.
- December 15, EPA acknowledged the availability of key personnel to meet in Kansas City on January 8, 2009 and was provided a list of proposed attendees in response. A meeting agenda was to be prepared and forwarded to EPA.

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:

- Compilation and submittal of off-site groundwater and Walnut River sampling data to EPA.
- Completion of the off-site soil gas Sampling and Analysis Plan.
- Continued preparation of the on-site soil characterization report.
- Finalization of the HHRA Work Plan.
- Continuation of the HHRA preparation.
- Summarization of the groundwater sampling data and initiation of the groundwater characterization report.

Other Relevant Documentation

None

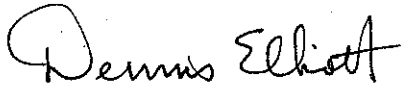
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I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal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

Mark deLorimier, Shaw Environmental, Inc.