Williams Petroleum Services, LLC
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July 16, 2007

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

Re: Quarterly Update – 2nd Quarter 2007
Former Augusta Refinery (FAR) RCRA Facility Investigation (RFI)
Williams Petroleum Services, 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, 2007.

Description of Activities

The following field activities were completed in accordance with respective Sampling and Analysis Plans (SAPs):

- April 2, completed soil sampling for screening of composite samples at 21 tank groups within AOC 5 (Leaded Tank bottom Disposal Areas).
- April 3 through April 12, completed additional surface soil sampling at the following sites:
  - AOC 4 (Truck and Rail Loading Racks)
  - AOC 6 (Tetraethyl Lead Storage Tanks)
  - SMWU 12 (API Separator)
  - Process Areas 1 and 2
  - SWMU 3 (West Landfarm)
  - SWMU 4 (East Landfarm)
  - AOC 1 (Surface Water Drainage Ditches)
  - SWMU 15 (Sludge Disposal Pit)
- April 30, authorized performance of treatability studies on the asphalt tar within SWMU 17.
- June 13 through June 18, completed further delineation surface soil sampling at AOC 1, AOC 4, AOC 6, PA 1, SWMU 4, SWMU 12, and SWMU 15.

- June 18 through 26, initiated installation and development of new temporary monitor wells at AOC B (Former Landfill North of Effluent Oxidation Pond) and AOC D (Asphaltic Materials Disposal Area), and SWMUs 8 (East Landfill), 9 (Industrial Landfill), and 17 (Asphalt Landfill).

Summary of All Findings

A total of 100 individual surface soil samples were collected and submitted to the analytical laboratory for compositing into 21 tank subarea groups within AOC 5. Each of the surface soil composite samples was screened against the Region 9 PRG for direct soil exposure to an industrial worker (direct soil exposure) value for each of the chemical constituents identified in the SAP. Arsenic results were also screened against the 95 percent UCL of the mean background concentration for arsenic. Composites were also screened against the Region 9 PRG calculated to be protective of the migration to groundwater pathway with a dilution factor of 1 (DAF 1).

An investigation progress summary for AOC 5 initial surface soil screening is included as ***Table 1***.

Based on evaluation of analytical results for samples obtained from April 3 through April 12, further sampling was performed in June to determine the extent of specific contaminants at AOC 1, AOC 4, AOC 6, PA 1, SWMU 4, SWMU 12, and SWMU 15.

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

- April 24th Williams requested approval on the planned assessment approach for landfill SWMUs 8, 9, and 17. EPA Region 7 expressed no objection to the approach on April 25th.
- April 27th the quarterly update for the 1st quarter of 2007 was submitted to the EPA.
- May 10th the SAP for AOC B and AOC D was submitted to the EPA for review and concurrence.
- May 10th the SAP Addendum for SWMU 8, SWMU 9, and SWMU 17 was submitted to the EPA for review and concurrence.
- June 7th EPA recommended implementation of the Sampling and Analysis Plans for AOCs B and D and SWMUs 8, 9, and 17.
- June 8th Conceptual Site Model was forwarded to the assigned EPA Risk Assessor.

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 second quarter of 2007 for subsequent submittal to EPA:

- Addendum for AOC 5 Second Phase
- Groundwater–Site-wide

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

- Second Phase Sampling of Nine (9) AOC 5 Locations (Tank Subareas)
- Install remaining temporary monitoring wells at SWMUs 9, 17, and AOC D.

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
Williams Petroleum Services, LLC

Enclosures

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

Table 1
FAR Facility Investigation Progress Summary
Former Augusta Refinery, Augusta, Kansas
Quarterly Status Report: 2nd Quarter 2007

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
AOC 5	03/21/07 - 04/02/07	• **Arsenic** concentrations in all 21 composite surface soil samples were greater than Region 9 direct soil exposure PRG (1.6 mg/kg). **Arsenic** concentrations in fifteen surface soil composite samples were also greater than the 95 percent UCL of the mean background concentration for **arsenic** (6.05 mg/kg), ranging from 6.4 to 60 mg/kg. To more effectively screen the arsenic data, a Site-specific screening level of 38 mg/kg is proposed, equal to the current KDHE Tier 2 Non-residential soil pathway risk-based screening level.	**TBD**	**TBD**	• Additional surface and subsurface sampling for **arsenic** in one tank group (using the proposed Site-specific screening level).
Total samples collected: one-hundred surface samples subsequently composited by the laboratory into 21 subareas (tank groups).		• **Organic lead** concentrations in eight surface soil composite samples were greater than the Region 9 PRG direct soil exposure (0.062 mg/kg), with results of 0.070 to 4.6 mg/kg.			• Additional surface and subsurface sampling for **organic lead** in seven tank groups (data collected from PA-2 can be used for the eighth group located within that unit).

Table 1
FAR Facility Investigation Progress Summary
Former Augusta Refinery, Augusta, Kansas
Quarterly Status Report: 2nd Quarter 2007

AOC / SWMU ID	Investigation Dates	Results			Actions Planned
		Surface Soil	Subsurface Soil	Groundwater	
AOC 5	03/21/07 - 04/02/07	▪ **Lead** concentrations in one surface soil compostie sample was greater than the Region 9 PRG direct soil exposure (800 mg/kg), with a result of 839 mg/kg.			▪ Additional surface and subsurface sampling for **lead** in one tank group.
		▪ **Chrysene** concentrations in two surface soil composite samples were greater than Region 9 DAF 1 PRG (8.0 mg/kg), with results of 9.94 and 44.8 mg/kg.			▪ Additional surface and subsurface sampling for **chrysene** in two tank groups.
					▪ A total of 16 monitor wells, 13 proposed and 3 existing wells, will be purged and sampled for the full analytical list outlined in the AOC 5 SAP. Groundwater data will be used for consideration of additional well placement when the groundwater is investigated site wide.