

Williams Petroleum Services, LLC

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October 29, 2007

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

Re: Quarterly Update – 3rd 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 July 1 through September 30, 2007.

Description of Activities

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

- July 6, arranged for transportation and disposal of investigation derived waste including: thirty-seven 55-gallon drums of soil from AOCs A (Former Oil Collection Pond), C (Former Pond Areas), E (Former Sludge Pond), F (Surface Staining), and G (Liquid Fuel Burning Facility Area, and SWMUs 10 (Effluent Oxidation Pond), 11 (Rainfall Runoff Storage Pond), and 13 (Oil Skimming Pond); and one 30-gallon drum of water/oil from monitor well sampling at SWMUs 1 (Caustic Evaporation-Neutralization Pond) and 2 (Slop Oil Emulsion Pond).
- July 23 through July 26, gauged and developed new temporary monitor wells at SWMUs 8 (East Landfill), 9 (Industrial Landfill), 17 (Asphalt Landfill), and AOCs 5 (Leaded Tank Bottom Disposal Areas), D (Asphaltic Material Disposal Area), and B (Former Landfill North of Effluent Oxidation Pond).
- July 25, performed additional soil sampling at AOC 5.
- July 25 through August 6, conducted groundwater sampling at AOCs 5, B, D, and SWMUs 8, 9, and 17.
- August 13 through August 17, gauged all on-site and off-site monitor wells.

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- September 4 through September 7, conducted additional surface soil sampling for lead at AOCs 1 (Surface Water Drainage Ditches), C, E, F, and G and SWMU 4.
- September 10 and 11, sampled drums of investigation derived waste for disposal characterization. Drums contain soil from installation of temporary monitor wells at SWMUs 8, 9, and 17 and AOCs 5, B, and D.
- September 13, conducted additional sampling of sediment at SWMU 10 for arsenic analysis.

Summary of All Findings

The evaluation of results obtained from sampling events conducted during the 3rd quarter is currently being performed and a summary of findings will be reported in the subsequent quarterly report.

Summaries of All EPA Approved Changes

None

Summaries of All Contacts

- June 8th Risk Assessment Work Planning Memo and exposure assumption tables forwarded to EPA for review and comment.
- July 5th AOC 5 Sampling and Analysis Plan (SAP) Addendum forwarded to EPA for review and concurrence.
- July 9th EPA was notified of a delay in the Phase 2 sampling at AOC 5 due to excessive rain and site flooding.
- July 17th Quarterly update for the 2nd quarter of 2007 was submitted to EPA.
- July 19th Conference call was conducted with EPA to discuss options for the screening of arsenic results across the site and sampling approaches.
- July 31st Formal request on revising the screening level for arsenic forwarded to EPA.
- August 6th EPA provided a memorandum of review comments (dated August 3rd) on the AOC 5 SAP Addendum.
- August 6th EPA provided a memorandum of review comments (dated July 25th) on the Risk Assessment Work Planning Memo.
- September 5th Responses to comments on the Risk Assessment Work Planning Memo forwarded to EPA.
- September 13th Parties agree to a meeting in Wichita on October 30th.
- October 1st EPA verbally confirms planned participation in the scheduled October 30th meeting in Wichita.
- October 2nd KDHE is contacted and confirms planned participation in the scheduled October 30th meeting in Wichita.

Summaries of Problems Encountered

None

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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:

- Groundwater-Site-wide

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

- Complete additional sampling at seven Tank Areas of AOC 5 Locations.
- Initiate implementation of Groundwater SAP upon concurrence from EPA.

Other Relevant Documentation

None

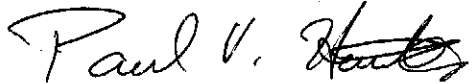
I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified 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.

Williams Petroleum Services, LLC

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

A handwritten signature in black ink that reads "Paul V. Hunter". The signature is written in a cursive style with a large, stylized "P" and "H".

Paul V. Hunter

Vice President

Williams Petroleum Services, LLC

Enclosures

cc: Mark deLorimier, Shaw Environmental, Inc.

David Way, Shaw Environmental, Inc.