Williams Petroleum Services, LLC

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

October 7, 2013

Mr. Kenneth Herstowski, P.E. Environmental Protection Agency, Region 7 AWMD/WRAP/MIRP 11201 Renner Boulevard Lenexa, Kansas 66219

Re: Quarterly Update – 3rd Quarter 2013
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 (FAR) 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, 2013.

Description of Activities

- In correspondence dated September 11, 2013, submitted a Corrective Measures Study (CMS) Work Plan to perform a water balance and LNAPL evaluation at the FAR.
- In correspondence dated September 23, 2013, submitted a Sampling and Analysis Plan Addendum for the proposed 2013 groundwater monitoring event.
- Initiated planning for stabilization of additional surface asphalt identified north of the SWMU 17 cap. Per the prior SWMU 17 stabilization project, the proposed remedy will be coordinated with KDHE Bureau of Waste.

Summary of All Findings

None.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- On July 17, 2013, WPS submitted the 2nd quarter 2013 update to EPA.
- In July 2013, 3 separate permit applications were submitted to USACE (Nationwide Permit), the KDHE DWR (Stream Obstruction Permit), and the KDHE BOW (Notice of Intent).

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Summaries of Problems Encountered

None.

Actions to Rectify Problems

None.

Changes in Key Project Entities

Mr. John Carey, III has assumed the Project Manager position for WPS.

Projected Work for the Next Reporting Period

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

- Bring resolution to submittal of an HHRA Addendum to address the additional data collection activities such that work can advance to the CMS.
- Complete the proposed groundwater monitoring event.
- Initiate the scope of work to perform an LNAPL monitoring evaluation for the CMS.
- Initiate the scope of work to complete a water balance evaluation for the CMS.
- Submit a scope of work to USEPA to plug and abandon temporary shallow monitor wells installed as part of the RFI field activities.
- Submit a Work Plan to KDHE, with copy to USEPA, for additional asphalt stabilization north of the SWMU 17 cap.
- Submit a Work Plan to EPA for the Walnut River Interim Corrective Measure.

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. John Carey, III with Williams Petroleum Services, LLC. If you have any questions, do not hesitate to contact Mr. Carey at (918) 573-8215.

Sincerely,

Williams Petroleum Services, LLC

Mark A. Gebbia

Manager, Environmental Services CoE

c: David Way, Shaw Environmental, Inc. (a CB&I Company)