



Williams Petroleum Services, LLC

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April 13, 2017

Mr. Don Lininger, CHMM
Chief, Waste Remediation & Permitting
Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Quarterly Update – 1st Quarter 2017
Former Augusta Refinery (FAR) RCRA Facility Investigation (RFI)
Williams Petroleum Services (WPS), LLC
Augusta, Kansas – KSD007235138

Dear Mr. Lininger:

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 January 1 through March 31, 2016.

Description of Activities

- Downloaded transducer data and collected water levels as part of the continued Water Balance evaluation through the ongoing monitoring of water level data per the September 11, 2013 scope of work.
- In accordance with the August 26, 2015 LNAPL Corrective Measures Study (CMS) Work Plan Addendum, completed routine manual and passive light non-aqueous phase liquid (LNAPL) recovery efforts for the continued evaluation of LNAPL removal efficacy.
- Performed post-construction inspections for the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.
- On February 16, 2017, CB&I submitted a sampling and analysis plan for site-wide groundwater monitoring to USEPA and KDHE.
- On February 16, 2017, CB&I had a call with Ken Herstowski of USEPA where Ken indicated his transition to a different role at USEPA and that the groundwater monitoring plan had been forwarded to Don Lininger for review.
- On February 27, 2017, Miles Stotts of KDHE issued an email request to add total petroleum hydrocarbon (TPH) monitoring to the groundwater monitoring program.

- On February 27, 2017, KDHE contacted David Way, after leaving messages for Lee Andrews with Williams, to discuss project transition and a recently proposed groundwater monitoring scope. After general discussions, it was agreed that a call was necessary with all stakeholder parties was appropriate.
- On March 1, 2017 a conference call was held with Williams, KDHE, and USEPA personnel. This call was instigated by recent transfer of Ken Herstowski, USEPA PM, to a different role at USEPA and subsequent USEPA/KDHE conversations regarding management of the FAR project.
- After the conference call on March 1, 2017, CB&I submitted an email response for TPH monitoring at the site.
- On March 1, 2017, CB&I initiated gauging activities per the February 16, 2017 sampling and analysis plan.
- On March 2, 2017, USEPA provided two letters to Williams and KDHE. The first indicated formal approval of the RFI with concurrence of a May 2017 meeting to scope the CMS. USEPA further indicated that they intend to request the draft CMS Work Plan per existing conditions of the Consent Order following the May 2017 meeting. The second letter presented notification of change in Project Coordinator. Ms. Carrie Ridley of KDHE will serve as Project Coordinator to oversee technical aspects of the project and USEPA will remain as Administrator.
- On March 7, 2017, KDHE submitted their requested list of monitoring well for TPH monitoring via email along with justification for well selection.
- On March 7, 2017, CB&I initiated groundwater monitoring activities per the February 16, 2017 sampling and analysis plan to include agreed upon wells for TPH monitoring.
- On March 22, 2017, Carrie Ridley of KDHE visited the FAR to split samples during groundwater monitoring.
- On March 23, 2017, CB&I submitted a memorandum documenting discussions and actions of the March 1, 2017 conference call
- In memorandum dated March 24, 2017, CB&I submitted RFI records electronically to USEPA and KDHE as a condition of the consent order.

Summary of All Findings

- Data collection for the LNAPL and Water Balance CMS Work Plans is an on-going process being performed over time to include seasonal factors in overall evaluation. Final data for the evaluation will be provided in the CMS for the FAR.

Summaries of All EPA Approved Changes

- On March 2, 2017, USEPA provided formal approval of the RFI.

Summaries of All Contacts

- On January 5, 2017, WPS submitted the 4th quarter 2016 update to the EPA.
- On February 16, 2017, CB&I submitted a sampling and analysis plan for site-wide groundwater monitoring to USEPA and KDHE.
- On February 16, 2017, CB&I had a call with Ken Herstowski of USEPA where Ken indicated his transition to a different role at USEPA and that the groundwater monitoring plan had been forwarded to Don Lininger for review.
- On February 27, 2017, Miles Stotts of KDHE issued an email request to add TPH monitoring to the groundwater monitoring program.
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Summaries of Problems Encountered

- None.

Actions to Rectify Problems

- None.

Changes in Key Project Entities

- On March 2, 2017, USEPA presented notification of change in Project Coordinator. Ms. Carrie Ridley of KDHE will serve as Project Coordinator to oversee technical aspects of the project and USEPA will remain as Administrator.

Projected Work for the Next Reporting Period

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

- Complete groundwater monitoring.
- Continue LNAPL monitoring and removal.
- Hold a meeting with USEPA and KDHE in May 2017 to establish the process for evaluating and selection corrective actions for various media at the FAR. It is envisioned that the meeting will follow the RCRA FIRST process and will include discussions regarding the Corrective Action Objectives, specific areas for corrective measure evaluation, and milestone timeline. With concurrence on the process, finalization of the CMS work plan will be initiated.

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.

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Please provide all written correspondence regarding this Quarterly Update directly to Mr. Lee Andrews, with Williams Petroleum Services, LLC. If you have any questions, do not hesitate to contact Mr. Andrews at (918) 573-6912.

Sincerely,

Williams Petroleum Services, LLC



Mark A. Gebbia

Director, Environmental Services CoE

c: Carrie Ridley, KDHE

Lee Andrews, Williams Petroleum Services, LLC

David Way, CB&I Environmental & Infrastructure, Inc.