



Williams Petroleum Services, LLC

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P.O. Box 3483
Tulsa, OK 74101-3483

April 11, 2018

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

Re: Quarterly Update – 1st Quarter 2018
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, 2018.

Description of Activities

- 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 monthly post-construction inspections for the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.
- On January 10, 2018, the FAR NPDES report was submitted to the KDHE.
- In correspondence dated January 25, 2018 from KDHE to Williams, KDHE requested a work plan to investigate the NuStar release location.
- In email dated February 28, 2018, APTIM submitted to KDHE SWMU 1 and 2 2017 Annual Post-Closure Groundwater Monitoring Report.
- In correspondence dated March 9, 2018, WPS requested an extension to submitting the NuStar release investigation work plan.

- In correspondence dated March 14, 2018, KDHE approved the WPS requested extension to submitting the NuStar release investigation work plan.

Summary of All Findings

- Data collection for the LNAPL CMS Work Plan Addendum 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/KDHE Approved Changes

- In correspondence dated March 14, 2018, KDHE approved the WPS requested extension to submitting the NuStar release investigation work plan.

Summaries of All Contacts

- On January 3, 2018, WPS submitted the 4th quarter 2017 update to the USEPA and KDHE.
- On January 10, 2018, the FAR NPDES report was submitted to the KDHE.
- In correspondence dated January 25, 2018 from KDHE to Williams, KDHE requested a work plan to investigate the NuStar release location.
- In email dated February 28, 2018, APTIM submitted to KDHE SWMU 1 and 2 2017 Annual Post-Closure Groundwater Monitoring Report.
- In correspondence dated March 9, 2018, WPS requested an extension to submitting the NuStar release investigation work plan.
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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:

- Continue LNAPL monitoring and removal.
- Continue Walnut River Interim Measures monitoring.
- Continue monthly NPDES monitoring.

- Performed June SWMU 1 and 2 biannual monitoring.
- Prepare and submit the Sampling and Analysis Plan for the NuStar Area of Concern.

Other Relevant Documentation

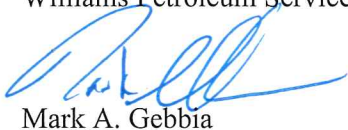
- None

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. 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

Vice President, Environmental, Regulatory & Permitting

c: Carrie Ridley, KDHE
Lee Andrews, Williams Petroleum Services, LLC
David Way, Aptim Environmental & Infrastructure, Inc.