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Williams Petroleum Services, LLC
One Williams Center
P.O. Box 3483
Tulsa, OK 74101-3483

April 15, 2025

Mr. Bradley Roberts
Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Quarterly Update – 1st Quarter 2025
Former Augusta Refinery (FAR) RCRA Facility Investigation (RFI)
Williams Petroleum Services (WPS), LLC
Augusta, Kansas – KSD007235138

Dear Mr. Roberts:

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 October 1 through December 31, 2024.

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.
- In correspondence dated January 15, 2025, the 4th Quarter 2024 Quarterly Update was submitted to the USEPA and KDHE.
- In conjunction with HF Sinclair, completed the installation of driving gates to increase ease of access for right-of-way maintenance and maintain site security.
- On March 31, 2025, submitted the 1st Quarter 2025 NPDES report to KDHE.
- Effective April 1, 2025, a renewed NPDES permit from KDHE is in place.

Summary of All Findings

- Analytical results for the surface soil delineation scope are final as of the date of this report. Results will be submitted to USEPA and KDHE under separate cover.

Summaries of All EPA/KDHE Approved Changes

- None.

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Summaries of All Contacts

- None.

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:

- Submit the 2024 SWMU 1&2 Annual Groundwater Monitoring Report to KDHE.
- Continue evaluating updated systems for LNAPL recovery.
- Submit the surface soil delineation results along with plans for surface soil removal.
- Continue quarterly NPDES monitoring.
- Initiate the 2025 groundwater monitoring event.

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

DocuSigned by:
Mark Gebbia
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Mark A. Gebbia
Vice President, Environmental, Regulatory & Permitting

c: Gary Blackburn, KDHE
Lee Andrews, Williams Petroleum Services, LLC
Steve Persons, Aptim Environmental & Infrastructure, LLC.