

Williams Petroleum Services, LLC

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July 7, 2014

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

Re: Quarterly Update – 2nd Quarter 2014
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 April 1 through June 30, 2014.

Description of Activities

- During the quarter, worked with Mr. Greg McCabe (EPA Risk Assessor) to resolve the Human Health Risk Assessment (HHRA) Addendum methods for evaluating the chromium IV data.
- During the weeks of April 7 and 14, 2014, completed 54 and plugged 41 of the existing two-inch temporary monitor wells in accordance with the EPA-approved Work Plan.
- On May 28, 2014, downloaded transducer data and collected water levels as part of the continued the Water Balance evaluation through monitoring of transducers per the September 11, 2013 scope of work.
- On June 2 and 3, 2014, gauged and bailed LNAPL from monitor wells as part of the continued the LNAPL evaluation per the September 11, 2013 scope of work.

Summary of All Findings

None.

Summaries of All EPA Approved Changes

None.

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Summaries of All Contacts

- On April 2, 2014, CB&I submitted the 2013 Groundwater Monitoring Report for the FAR to the EPA.
- On April 3, 2014, CB&I submitted a revised work plan addendum for plugging/completion of temporary 2-inch monitor wells to the EPA. The revised work plan included additional wells to be retained for completion as requested by the EPA and plugging of wells that were noted as damaged during the recent groundwater monitoring event.
- On April 7, 2014, WPS submitted the 1st quarter 2014 update to the EPA.
- On May 19, 2014, CB&I submitted the SWMU 17 Additional Asphalt Stabilization Report to the KDHE.
- During the quarter, CB&I continued communications with EPA regarding the HHRA Addendum. On June 26, 2014 an agreement was reached with EPA regarding the evaluation methods for the chromium VI in the HHRA Addendum.

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:

- Submittal of an HHRA Addendum to address the additional data collection activities such that work can advance to the CMS.
- Continue work on the LNAPL monitoring evaluation for the CMS.
- Continue work on the water balance evaluation for the CMS.
- Continue work on the Walnut River AOI Interim Corrective Measures.

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 per-

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son 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. 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: John Carey, III, Williams Petroleum Services, LLC
David Way, CB&I Environmental & Infrastructure, Inc.