

Williams Petroleum Services, LLC

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July 7, 2016

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

Re: Quarterly Update – 2nd Quarter 2016

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, 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.
- In correspondence dated April 6, 2016, CB&I provided responses to the action items developed from the February 23, 2016 meeting with the United States Environmental Protection Agency (USEPA) and Kansas Department of Health and Environment (KDHE). The responses included transmittal of a well log library to USEPA and KDHE, historic site database information for 1,2-dichloroethane and ethylene dibromide data, and clarification narrative of the perchloroethylene detections at the FAR. The well log library was transmitted electronically via FTP due to file size.
- In correspondence dated April 6, 2016, a scope of work for the installation of a bedrock monitoring well was submitted to USEPA. The installation scope was developed as an action item from the February 23, 2016 meeting with USEPA and KDHE.

- In email correspondence dated April 29, 2016, USEPA provided two comments to the April 6, 2016 bedrock well scope of work.
- In correspondence dated May 2, 2016, a revised scope of work for the installation of the bedrock monitoring well was submitted to USEPA based upon regulatory comments.
- Based upon regulatory concurrence, plans for installation of the bedrock well were initiated and completed. Planning included coordination of access with the City of Augusta and KDOT for access across their right of way.
- Final well installation of FAR16-01BR was completed on June 18, 2016. KDHE was present to observe the initial drilling activities at the site. The well log for this well is attached. Well development occurred the week of June 13, 2016 and the well was sampled on June 20, 2016. Sample results are pending.
- Performed monthly post-construction inspections for the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.

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.
- Final data collected for the Water Balance CMS Work Plan scope will be presented in the CMS for the FAR.
- The well log for FAR16-01BR is attached. Well development occurred the week of June 13, 2016 and the well was sampled on June 20, 2016. Sample results are pending.

Summaries of All EPA Approved Changes

• In email correspondence dated April 29, 2016, USEPA provided two comments to the April 6, 2016 bedrock well scope of work and provided approval to proceed with well installation.

Summaries of All Contacts

- In correspondence dated April 6, 2016, CB&I provided responses to the action items developed from the February 23, 2016 meeting with the USEPA and KDHE.
- In correspondence dated April 6, 2016, a scope of work for the installation of a bedrock monitoring well was submitted to USEPA. The installation scope was developed as an action item from the February 23, 2016 meeting with USEPA and KDHE.
- On April 8, 2016, WPS submitted the 1st quarter 2016 update to the EPA.
- In email correspondence dated April 29, 2016, USEPA provided two comments to the April 6, 2016 bedrock well scope of work.

- In correspondence dated May 2, 2016, a revised scope of work for the installation of the bedrock monitoring well was submitted to USEPA based upon regulatory comments.
- In email correspondence dated May 2, 2016, access discussions were had with KDOT personnel.
- In email correspondence dated May 2, 2016, drilling notification was provided to City of Augusta personnel.
- In phone and email correspondence dated May 3, 2016, Figure 4.2 from Groundwater RFI Report, output from FAR well construction database, and "B" well WWC5 forms were provided to Ms. Carrie Ridley from KDHE.

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 analytical results for FAR16-01BR well to USEPA.
- Based on the results from the bedrock well sampling, work with USEPA to finalize the RFI
 process for the FAR.
- Continue work on the LNAPL monitoring evaluation for the CMS.
- Continue work on the water balance evaluation for the CMS.
- Continue work on the SWMU-16 evaluation for the CMS.
- Prepare "Surface Water Sampling & Riverbank Seep PAB Performance Monitoring" letter report including a calculation of the remaining PAB adsorption capacity, site observations, and any available surface water analytical results.
- Perform monthly post-construction inspections of the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.

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

Williams Petroleum Services, LLC

July 7, 2016

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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

Director, Environmental Services CoE

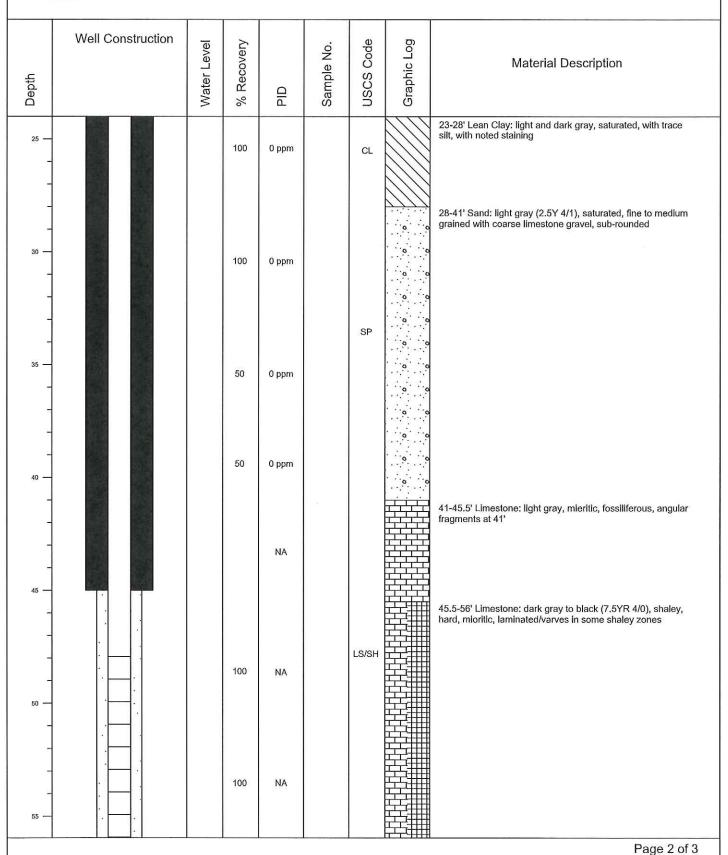
c: Lee Andrews, Williams Petroleum Services, LLC
 John Carey, III, Williams Petroleum Services, LLC
 David Way, CB&I Environmental & Infrastructure, Inc.

									-	10000	Site Id: FAR16-01 BR
C	BI		ita, Ka	nsas 6	N., Ste. 7205	106					Date Started: 06/07/16
Project Name: Williams FAR							Coordina	ate X: 3	37.665	415	Blank Casing: type:PVC
Project	Number:	149	093				Coordina	ate Y: -	96.980	0834	dia:6.00in dia:2.00in fm:0.00' to:45.00' fm:-2.3' to:48.00'
Location: Augusta, KS							Static W	ater Lev	el: 12	.6'	Screens:
Logged By: Doug Lane							Measurii	ng Point	: 0.00)'	type:Slotted size:0.010in dia: 2.00i
Contractor: Diversified							Total De	pth: 60	.00'		fm:48.00' to:58.00'
Drilling Method: HSA and Mud Rotary					у	Borehole	Dia.: 1	0.00in	0-46' 46-58'	Annular Fill:	
Remarks: 8" HSA w/continuous sampling 0 10" mud rotary 0-46' 6" mud rotary 46-58' 2" core 46-60'						ling 0				.0 00	type: Bentonite fm: 0.00' to: 47.00' type: Sand Pack fm: 58.00' to: 47.00'
		10 10									Completed Depth: 58.00'
Depth	Well	Cons	tructi	ion	Water Level	% Recovery	PID	Sample No.	USCS Code	Graphic Log	Material Description
5 —						100	0 ppm		CL		0-3' Clay: dark brown (5YR 3/1), moist, with trace silt 3-8' Lean Clay: red brown (5YR 4/4), moist, medium stiff to stiff, with little to some silt, increase silt with depth
10 —						100	0 ppm		МН		8-13' Silt: dark brown (7.5YR 3/2), dry, crumbly, with trace clay 13-18' Fat Clay: dark brown (5YR 4/2), moist to wet, semi
15 —						100	0 ppm		СН		stiff, with trace silt
20 —						50	0 ppm		СН		18-23' Fat Clay: Same as above, saturated, with slight hydrocarbon odor and slight sheen
-										M	23-28' Lean Clay: light and dark gray, saturated, with trace silt, with noted staining
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Site Id: FAR16-01BR

Date Started: 06/07/16





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Date Started: 06/07/16

	Well Construction	Water Level	% Recovery		Sample No.	USCS Code	Graphic Log	Material Description
Depth		Wate	% Re	PID	Samp	nsce		
60 —		W	% 100	NA NA	ď	SH	5	56-60' Shale: blue/green, limey, hard, weak laminated zones at 2-3" intervals, no H2O loss Total Boring Depth 60'
						Я		