

Williams Petroleum Services, LLC

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

July 3, 2017

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

Re: Quarterly Update – 2nd 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 April 1 through June 30, 2017.

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 May 23, 2017, CB&I forwarded an agenda and supporting meeting information to USEPA and KDHE for the Remedy Selection Process (RSP) meeting to be held at USEPA offices in Lenexa, Kansas.
- On June 6, 2017, the RSP meeting was held at USEPA offices in Lenexa, Kansas. Plans for the CMS Work Plan and CMS Report were discussed.

Summary of All Findings

- Draft data collected for the recent groundwater monitoring event was presented to USEPA and KDHE in the June 6, 2017 RSP meeting. Final data from this event will be presented in the CMS Work Plan to document current groundwater conditions at the site.
- 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

• None.

Summaries of All Contacts

- On April 13, 2017, WPS submitted the 1st quarter 2017 update to the USEPA and KDHE.
- On June 6, 2017, the RSP meeting was held at USEPA offices in Lenexa, Kansas. Plans for the CMS Work Plan and CMS Report were discussed. Personnel from USEPA, KDHE, WPS, ExxonMobil, and CB&I attended the meeting.

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.
- Formalize documentation of the June 6, 2017 RSP meeting minutes and action items. Action
 items from the meeting included submitting meeting minutes, revising the draft Corrective Action Objective table, and submitting a Waste Determination Request to KDHE for wastes at
 SWMU 12 and SWMU 16.

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

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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: Carrie Ridley, KDHE

Lee Andrews, Williams Petroleum Services, LLC David Way, CB&I Environmental & Infrastructure, Inc.