

Williams Petroleum Services, LLC

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

July 5, 2018

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

Re:

Quarterly Update – 2nd 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 April 1 through June 30, 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 April 3, 2018, the FAR NPDES report was submitted to the KDHE.
- In correspondence dated June 15, 2018, WPS submitted a Sampling and Analysis Plan for the NuStar release AOC.
- Completed biannual monitoring at SWMU 1 and 2.
- In correspondence from the KDHE dated June 26, 2018, KDHE provided comments on the Draft CMS Work Plan dated November 30, 2017.

Summary of All Findings

None.

Summaries of All EPA/KDHE Approved Changes

• In correspondence from the KDHE dated June 26, 2018, KDHE provided comments on the Draft CMS Work Plan dated November 30, 2017.

Summaries of All Contacts

- On April 6, 2018, WPS submitted the 1st quarter 2018 update to the USEPA and KDHE.
- On April 3, 2018, the FAR NPDES report was submitted to the KDHE.
- In correspondence dated June 15, 2018, WPS submitted a Sampling and Analysis Plan for the NuStar release AOC.

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 monthly NPDES monitoring.
- Prepare responses to the KDHE CMS Work Plan comments.

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

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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: Gary Blackburn, KDHE

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