



Williams Petroleum Services, LLC

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Tulsa, OK 74101-3483

July 2, 2019

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

Re: Quarterly Update – 2nd Quarter 2019
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, 2019.

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 April 8, 2019, the 1st quarter 2019 NPDES report was submitted to KDHE.
- In correspondence dated April 2, 2019, the 4th quarter 2018 Quarterly Report was submitted to the USEPA and KDHE.
- During the period from April 30 to May 3, pilot testing activities included injection of Petro-Fix™ Remediation Fluid according to the pilot test work plan. KDHE performed field observations of the injection activities on May 1, 2019.
- In email dated May 14, 2019, APTIM submitted the Hazardous Waste Site Verification Report to the KDHE.

- On May 16 and June 17, completed the first two monthly monitoring events of the injection pilot test cell.
- Completed initial NPDES sampling on May 22 within the one week period of initiating discharge from Outfall 001B1 under the site NPDES permit from the North Pond to the Whitewater River on May 21.
- In email dated May 23, 2019, APTIM submitted NuStar AOC soil and groundwater sampling results data package to the KDHE. This data package included recommendations for additional groundwater delineation actions.
- On June 11, 2019, completed 2nd quarterly NPDES sampling.
- On June 17 through June 19, completed the first biannual groundwater monitoring event at SWMU 1 and 2.
- In June 2019, 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.

Summary of All Findings

- None.

Summaries of All EPA/KDHE Approved Changes

- None.

Summaries of All Contacts

- See description of activities.

Summaries of Problems Encountered

- Significant spring rains at the FAR and general area caused site flooding issues. During the month of May, approximately 21 inches of rain fell in Augusta and surround areas causing flooding of the site, and excessively high water levels on both the Walnut and Whitewater Rivers. A lightning strike on May 24 took down the legacy dewatering pump system causing surface water to back up on the site.

Actions to Rectify Problems

- On May 30 a rental pump with smaller pump rate capacity was deployed at the site to transfer the on-site water to the retention ponds. To alleviate the buildup on the ponds, discharge was initiated under the site NPDES permit from the stormwater pond to the Whitewater River on May 21 and discharge continued through June 28.

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 quarterly NPDES monitoring.
- Continue pilot test monitoring activities.
- With KDHE approval of the NuStar AOC scope of work, complete the additional assessment activities.
- Replacement of the Levee pump and motor.

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.

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, LLC.