



Williams Petroleum Services, LLC

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

July 7, 2020

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

Re: Quarterly Update – 2nd Quarter 2020
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, 2020.

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.
- 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 correspondence dated April 2, 2020, the 1st quarter 2020 NPDES report was submitted to KDHE.
- In correspondence dated April 21, 2020, from the KDHE to Williams Petroleum Services, KDHE acknowledged receipt of the Additional Investigation Sampling Results Data Package for the NuStar Area of Concern (NAOC) and requested that the NAOC wells be resampled within the year to confirm the findings of the report.
- In correspondence dated May 5, 2020, the 1st quarter 2019 Quarterly Report was submitted to the USEPA and KDHE.

- On June 5, 2020, completed the 2nd quarterly NPDES sampling. The event included sampling 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 June 8 through June 11, 2020, completed the first biannual groundwater monitoring event at SWMU 1 and 2.
- On June 9, 2020, completed the groundwater sampling event of the NAOC wells.
- On June 22, 2020, completed the Walnut River PAB performance monitoring and surface water sampling.

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

- Due to restrictions associated with the COVID virus, the planned project update meeting with USEPA and KDHE for April 21, 2020 was postponed to a date to be determined later.

Actions to Rectify Problems

- At the request of KDHE, a project update meeting will be scheduled via video conference in Q3.

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:

- At the request of KDHE, a project update meeting will be scheduled via video conference in Q3.
- Continue LNAPL monitoring and removal.
- Continue quarterly NPDES monitoring.

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.