



Williams Petroleum Services, LLC

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

July 15, 2021

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

Re: Quarterly Update – 2nd Quarter 2021
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, 2021.

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.
- On April 8, 2021, completed the resampling of the Former Seep-8 as part of the Walnut River PAB performance monitoring and surface water sampling.
- In correspondence dated April 29, 2021, the 1st quarter 2021 Quarterly Report was submitted to the USEPA and KDHE.
- During the week of May 10, 2021, APTIM completed the field portion of the phytoremediation feasibility assessment.
- On May 18, 2021, Williams had conversations with the Augusta City Manager regarding the City's stormwater infrastructure evaluation program.

- In correspondence dated May 18, 2021, from the KDHE to Williams Petroleum Services, KDHE acknowledged receipt of the 2020 Annual Post-Closure Groundwater Monitoring Report for SWMUs 1 & 2.
- On June 21 and June 22, 2021, completed the first biannual groundwater monitoring event at SWMU 1 and 2.
- On June 23, 2021, completed the Walnut River PAB performance monitoring and surface water sampling.
- On June 23, 2021, completed the 2nd quarterly NPDES sampling.
- In June 2021, 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 May and June, held site meetings at the Walnut River AOI with a construction contractor to scope out a remedy for the detections of benzene in surface water adjacent to former Seep-8.

Summary of All Findings

- With the observation of hydrocarbon concentrations in surface water adjacent to the former Seep-8 location, an evaluation of the Interim Corrective Measures previously performed was undertaken to identify the source. It appears that the Interim Corrective Measures are performing as designed to address the seeps, but there is an area at the northern end of the barrier with hydrocarbon mass not addressed with interim measures that is likely contributing to the surface water concentrations. Further evaluation of alternatives to address this area was performed in May and June.

Summaries of All EPA/KDHE Approved Changes

- None.

Summaries of All Contacts

- See description of activities.

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 quarterly NPDES monitoring.
- Completion of the phytoremediation feasibility assessment.
- Complete evaluation and present a remedy for addressing the area contributing concentrations in surface water at former Seep-8.

Other Relevant Documentation

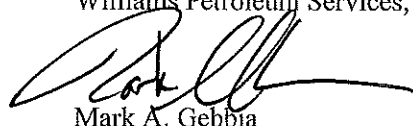
- None

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 P. Andrews, Williams Petroleum Services, LLC

David Way, Aptim Environmental & Infrastructure, LLC.



Reviews/Approvals

Requested Duration of CRM/PSIP:

- ☐ Site/Project length of RFS or Long Form Contract only
- ☒ Requested through end date shown (not to exceed 1 year for OA or Enterprise-Wide variances)

Operating Area/Site/Project Name:

EI

Requested End Date of Variance:

4/20/2022

Requestor Signature:

Date:

5/21/2021

Reviews and Recommendations

Field Safety Representative Review Signature:

- ☒ Recommend
- ☐ Not Recommended

Date

Manager, Operations (if applicable):

- ☐ Recommend
- ☐ Not Recommended

Date

Field Environmental Representative Review Signature (if applicable):

- ☒ Recommend
- ☐ Not Recommended

Date

5/21/2021

15 Jun 21

Approvals

NOTE: Enterprise-Wide CRM/PSIP for all areas must be approved by the Blanket Variance Committee

NOTE: OA-wide CRM/PSIP are only to be used for operations, maintenance, construction, or environmental contractors in which the Risk Mitigation/Safety Improvement Plan is applicable to all areas in the OA. Plans for Engineering Services contractors completing brownfield work requires an approval from Operations and Engineering Services.

Contractor Representative Signature:

Barry A. Baker AECOM Vice President

Barry A. Baker

Date:

5/20/2021

Approved For:

- ☐ Site/Project Use Only
- ☒ OA/Franchise Only (not to exceed 1 year)
- ☐ Corporate Enterprise-Wide (not to exceed 1 year)

Approved End Date of Variance:

4/20/2022

6/30/22

Approved by (check all that apply for ES, Tactical, and Operations):

- ☐ ES, Ops. Tactical/Tech Services Director (Yellow)
- ☐ ES, Ops. Tactical/Tech Services VP/GM (Red)
- ☒ Sr. VP (OA-Wide Variance) or VP/GM (Franchise-Wide Variance)
- ☐ Enterprise-Wide Variance Committee Chair Person

Approver's Signature:

Approver's Signature (additional Operations signature required for Brownfield ES & Tactical projects):

Date:

7/15/21

Contractor Risk Mitigation/Safety Improvement Plan (CRMP/SIP)

F02-201

Revision 01

Effective Date 05/14/2021

Related 02.20.01.01 – US Contractor Safety Management

O/S

Instructions: This form must be completed and approved before using a contractor with a dashboard grade of yellow or red in ISNetwork. The Project Manager/Contract Requestor will complete the form with input from the contractor.

Contractor Information		
Company Name:	Contractor Representative:	Grade:
AECOM Technical Services	Heather Brewster	Yellow
Internal Company Information		
Contract Requestor:	Plan Developer:	
Lee Andrews	Lee Andrews	
Define the risk/deficiency (include details describing the deficiency and the relationship of the risk to the scope of work):	AECOM Technical Services (AECOM) is currently 'Yellow' flagged in PEC/Verforce due to a regulatory citation received elsewhere on non-Williams work. Below is a description of the citation and the corrective actions taken by AECOM: • Hawaii Occupational Safety and Health Administration: On January 23, 2019, AECOM was given an "other than serious" citation from HIOSH related to failure to conduct regular inspections on a project site where a lost time injury occurred. AECOM paid a penalty of \$4,619. Corrective action: Safety and health inspections were conducted to ensure new or previously missed hazards are identified and controlled. Citation is factored in the PEC/Verforce grading criteria until February 2023.	
Justification: Provide a brief summary of why the decision was made to use this contractor. Check all that apply.	<input checked="" type="checkbox"/> Limited availability of other contractors to do this type of work and/or unsatisfactory safety records of competitors <input type="checkbox"/> Changes because of mergers, acquisitions, divestments <input checked="" type="checkbox"/> Regional safety performance of a contractor differs from that of the entire company (note regional metrics as evidence (e.g., regional TRIR, etc.)) <input type="checkbox"/> Qualitative comment on the contractor commitment to achieving an injury free workplace (what processes/systems is the contractor going to implement?) <input type="checkbox"/> Trend information on safety performance - safety performance improvement over time (note trend metrics as evidence) <input type="checkbox"/> Contractor resources (people, training) added to Company sites <input type="checkbox"/> Other (Please explain):	
<input type="checkbox"/> Check this box if contractor is Yellow or Red due to a motor vehicle accident <u>only</u> . If EMR is greater than 1.0 solely due to a motor vehicle accident, a letter from the insurance provider is required. <input type="checkbox"/> Check this box if contractor is Yellow due to an EPA citation <u>only</u> . <input type="checkbox"/> Check this box if contractor's EMR is greater than 1.0 solely due to a non-work related or work related travel injury. A letter from the insurance provider is required. If any of the boxes in this section are checked, a Director (Yellow) or VP/GM (Red) signature is required. Do not complete the rest of the form.		