

Williams Petroleum Services, LLC

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

July 28, 2022

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

Re:

Quarterly Update - 2nd Quarter 2022

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, 2022.

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. **Table 1** attached, provides the monthly LNAPL gauging and cumulative LNAPL recovery for 2022.
- In correspondence dated May 1, 2022, the 2nd quarter 2022 Quarterly Report was submitted to the USEPA and KDHE.
- In correspondence dated April 12, 2022, KDHE provided comments to the 2021 Groundwater Sampling Event data report requesting updated tables and field notes.
- In correspondence dated April 12, 2022, KDHE acknowledged receipt of the Soil Excavation in Area of Former Seep 8, Walnut River Area of Interest (WRAOI) Report dated March 10, 2022.

- In correspondence dated April 28, 2022, KDHE acknowledged receipt of the 4th Quarter 2021 Quarterly Report, submitted on March 3, 2022, including the Phytoremediation Feasibility Assessment report.
- In email correspondence dated May 4, 2022, the requested updated tables and field notes for the FAR 2021 Groundwater Sampling Event were submitted to the USEPA and KDHE.
- One June 15, 2022, completed the 2nd quarterly NPDES sampling.
- On June 20 and June 21, 2022, completed the first biannual groundwater monitoring event at SWMU 1 and 2.
- On June 23, 2022, 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

• No exceedances were noted in the 2nd quarter NPDES monitoring results.

Summaries of All EPA/KDHE Approved Changes

None.

Summaries of All Contacts

None.

Summaries of Problems Encountered

• The Walnut River Surface Water Sampling was not completed during the month of June due to continued discharge upstream from the El Dorado Lake and high-stage (base-flow) conditions (greater than 100 cubic feet per second (cfs)) for the Walnut River at Augusta.

Actions to Rectify Problems

• The Walnut River Surface Water Sampling will be completed during the month of July when the base-flow conditions drop below 100 cfs for the Walnut River at Augusta.

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.

Williams Petroleum Services, LLC

July 28, 2022 Page 3

• Submit a formal interim measures scope of work to complete the cleaning and abandonment of SWMU 12 and 16 to the agencies.

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.