

Williams Petroleum Services, LLC

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October 8, 2014

Mr. Kenneth Herstowski, P.E.
Environmental Protection Agency, Region 7
AWMD/WRAP/MIRP
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Quarterly Update – 3rd Quarter 2014
Former Augusta Refinery (FAR) RCRA Facility Investigation (RFI)
Williams Petroleum Services (WPS), LLC
Augusta, Kansas – KSD007235138

Dear Mr. Herstowski:

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 July 1 through September 30, 2014.

Description of Activities

- During the quarter, continued to work with Mr. Greg McCabe (EPA Risk Assessor) to resolve the Human Health Risk Assessment (HHRA) Addendum methods for evaluating the chromium IV and organic lead data.
- On August 12, 2014, submitted a Corrective Measures Study (CMS) Work Plan Addendum to USEPA for an expanded evaluation of the light non-aqueous phase liquid (LNAPL) at the site. In accordance with the Work Plan Addendum, initiated the scope through installation of passive bailers in select wells on September 29, 2014.
- On August 12, 2014, submitted a CMS Work Plan to USEPA for evaluation of SWMU-16; the oily-water separator system. Per the scope of work, seal inspections were initiated on September 9, 2014 and observatory excavations initiated on September 29, 2014.
- On September 24, 2014, downloaded transducer data and collected water levels as part of the continued the Water Balance evaluation through monitoring of transducers per the September 11, 2013 scope of work.
- From September 3 to 10, 2014, gauged and bailed LNAPL from monitor wells as part of the continued the LNAPL evaluation per the September 11, 2013 scope of work.

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Summary of All Findings

None.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- On July 7, 2014, WPS submitted the 2nd quarter 2014 update to the EPA.
- On August 12, 2014, submitted a CMS Work Plan Addendum to USEPA for an expanded evaluation of the LNAPL at the site.
- On August 12, 2014, submitted a CMS Work Plan to USEPA for evaluation of SWMU-16; the oily-water separator system.
- During the quarter, CB&I continued communications with USEPA regarding the HHRA Addendum.

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:

- Submittal of an HHRA Addendum to address the additional data collection activities such that work can advance to the CMS.
- Continue work on the LNAPL monitoring evaluation for the CMS.
- Continue work on the water balance evaluation for the CMS.
- Continue work on the SWMU-16 evaluation for the CMS.
- Continue work on the Walnut River AOI Interim Corrective Measures.

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

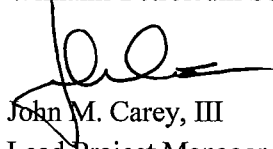
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and all attachments were prepared in accordance with the procedures designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those 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. John Carey, III with Williams Petroleum Services, LLC. If you have any questions, do not hesitate to contact Mr. Carey at (918) 573-8215.

Sincerely,

Williams Petroleum Services, LLC



John M. Carey, III

Lead Project Manager - Environmental

c: David Way, CB&I Environmental & Infrastructure, Inc.