

Williams Petroleum Services, LLC

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October 4, 2016

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

Re: Quarterly Update – 3rd Quarter 2016
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, 2016.

Description of Activities

- 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 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 August 3, 2016, CB&I provided the formal results of the bedrock well installation and sampling to the United States Environmental Protection Agency (USEPA) and Kansas Department of Health and Environment (KDHE).
- Performed monthly post-construction inspections for the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.
- Prepared "Surface Water Sampling & Riverbank Seep PAB Performance Monitoring" letter report including a calculation of the remaining PAB adsorption capacity and site observations.

Summary of All Findings

- Data collection for the LNAPL CMS Work Plan Addendum is an on-going process being performed over time to include seasonal factors in overall evaluation. Final data for the evaluation will be provided in the CMS for the FAR.
- Final data collected for the Water Balance CMS Work Plan scope will be presented in the CMS for the FAR.

Summaries of All EPA Approved Changes

- None.

Summaries of All Contacts

- On July 7, 2016, WPS submitted the 2nd quarter 2016 update to the EPA.
- In correspondence dated August 3, 2016, CB&I provided the formal results of the bedrock well installation and sampling to the USEPA and KDHE.
- In phone correspondence dated August 22, 2016, results of the bedrock well installation scope were discussed with Mr. Ken Herstowski of USEPA. In addition, the next steps following the RCRA FIRST process were discussed.

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:

- Settle on an agenda for a preliminary remedy selection meeting in which the next steps of the project toward remedy selection are addressed. The target date for the meeting will be some time during the 4th quarter 2016.
- Continue work on the LNAPL monitoring evaluation.
- Continue work on the water balance evaluation.
- Continue work on the SWMU-16 evaluation.

- Prepare "Surface Water Sampling & Riverbank Seep PAB Performance Monitoring" letter report including a calculation of the remaining PAB adsorption capacity, site observations, and any available surface water analytical results.
- Perform monthly post-construction inspections of the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.

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

Director, Environmental Services

c: Lee Andrews, Williams Petroleum Services, LLC
John Carey, III, Williams Petroleum Services, LLC
David Way, CB&I Environmental & Infrastructure, Inc.