



## Williams Petroleum Services, LLC

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

October 10, 2018

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

Re: Quarterly Update – 3rd Quarter 2018  
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 July 1 through September 30, 2018.

### *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.
- Performed monthly post-construction inspections for the Walnut River AOI Interim Measures including riverbank seep monitoring, re-vegetation inspections, and LNAPL recovery.
- In correspondence dated July 5, 2018, KDHE provided approval of the January 25, 2018 NuStar Sampling and Analysis Plan.
- In correspondence dated July 20, 2018, the FAR NPDES report was submitted to the KDHE.
- In correspondence dated August 2, 2018, The Groundwater Monitoring Results Data Package for the June 2018 SWMU 1 and 2 monitoring event was provided to KDHE.
- In email dated August 21, 2018, KDHE provided approval of the CMS Work Plan.

- In correspondence dated September 11, 2018, a right of way permit application was submitted to the Kansas Department of Transportation for the pilot test at the right of way on the east side of Highway 77.
- In correspondence dated September 18, 2018, UIC permit applications for the two pilot tests were submitted to KDHE.
- In correspondence dated September 19, 2018, notification of field work activities on City of Augusta property was submitted to the City of Augusta.
- In email correspondence dated September 26 and 27, 2018, KDHE provided UIC approval for the two pilot tests.

*Summary of All Findings*

- None.

*Summaries of All EPA/KDHE Approved Changes*

- In correspondence dated July 5, 2018, KDHE provided approval of the January 25, 2018 NuStar Sampling and Analysis Plan.
- In email dated August 21, 2018, KDHE provided approval of the CMS Work Plan.
- In email correspondence dated September 26 and 27, 2018, KDHE provided UIC approval for the two pilot tests.

*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.
- Complete pilot test cell construction and initiate pilot testing activities.
- Complete the NuStar AOC sampling and analysis plan activities.

*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, Inc.