



Williams Petroleum Services, LLC

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October 8, 2019

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

Re: Quarterly Update – 3rd Quarter 2019
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, 2019.

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.
- In July 2019, 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 correspondence dated July 9, 2019, the 2nd quarter 2019 NPDES report was submitted to KDHE.
- In correspondence dated July 2, 2019, the 2nd quarter 2019 Quarterly Report was submitted to the USEPA and KDHE.
- On July 25, completed the third monitoring event of the PetroFix™ Remediation Fluid injection pilot test cell.

- On August 26, 2019, installed the new west Levee Pond pump and motor. Pulled the east Levee Pond pump and motor for inspection and repair or replacement.
- On August 26 through August 28, 2019, completed the site wide 2019 groundwater gauging event.
- On September 3, 2019, initiated the site wide 2019 groundwater sampling event.
- On September 4 through September 6, 2019, completed installation and development of four additional monitoring wells in the NuStar AOC.
- On September 11, 2019, completed groundwater sampling of the NuStar AOC monitoring wells.
- On September 23, 2019, completed 3rd quarterly NPDES sampling.
- On September 30, completed the fourth monitoring event of the PetroFix™ Remediation Fluid injection pilot test cell.

Summary of All Findings

- None.

Summaries of All EPA/KDHE Approved Changes

- None.

Summaries of All Contacts

- See description of activities.

Summaries of Problems Encountered

- The monitoring plan for the Walnut River Area of Interest Interim Measures contains a requirement to monitor concentrations in the Walnut River every 6 months when flow rates are at base flow conditions (< 50 cubic feet per second). Due to high recurring precipitation in 2019, high Walnut River flow rates (> 100 cubic feet per second) have prevented surface water performance sampling.

Actions to Rectify Problems

- Walnut River flow rates will be continually monitored and the Walnut River AOI surface water performance sampling completed as soon as flow rates drop to less than 100 cubic feet per second.

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.
- Continue pilot test monitoring activities.
- Complete Walnut River AOI surface water performance sampling if Walnut River flow conditions return to base flow conditions (<50 cubic feet per second).
- Submit the NuStar data package.
- Submit the 2019 Groundwater Sampling Event data package.

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.