

## Williams Petroleum Services, LLC

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

October 5, 2020

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

Re:

Quarterly Update – 3rd Quarter 2020

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, 2020.

#### 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 correspondence dated July 7, 2020, the 2nd quarter 2020 Quarterly Report was submitted to the USEPA and KDHE.
- In correspondence dated July 14, 2020, the 2nd quarter 2020 NPDES report was submitted to the Kansas Department of Health and Environment (KDHE).
- In correspondence dated July 29, 2020, from Aptim Environmental & Infrastructure, LLC (APTIM) to KDHE, APTIM provided the groundwater sampling results data package for the NuStar Area of Concern (NAOC) groundwater sampling event completed June 8 and 9, 2020.
- In correspondence dated August 10, 2020, from APTIM to KDHE, APTIM provided the groundwater sampling results data package for the Solid Waste Management Units (SWMUs) 1 and 2, June 2020 semi-annual monitoring event completed June 8 and 11, 2020.

- On August 18, 2020, Aptim, on behalf of WPS, provided a project status webcast with the USEPA and KDHE.
- On September 24, 2020, completed the 3rd quarterly NPDES sampling. The event included the collection of a dip sample from the North pond (001DS) under the site NPDES permit. No discharge was occurring from the North pond to the Whitewater River at the time of sample collection.

### Summary of All Findings

• None.

#### Summaries of All EPA/KDHE Approved Changes

- During the project status webcast on August 18, 2020, Williams requested that the NuStar AOC be managed by KDHE outside of the FAR RCRA process. KDHE indicated they would provide guidance regarding the management of the NuStar AOC going forward.
- During the project status webcast on August 18, 2020, USEPA and KDHE agreed to moving forward with Interim Remedial Measures for SWMU 12 and 16.
- During the project status webcast on August 18, 2020, KDHE agreed to take the lead on the re-evaluation of the Environmental Indicators for the FAR.

#### 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:

- Work with KDHE to re-evaluate Environmental Indicators for the FAR.
- Continue to develop Interim Remedial Measures process and plans for SWMU 12 and 16.
- Continue LNAPL monitoring and removal.
- Continue quarterly NPDES monitoring.
- Complete Walnut River AOI surface water performance sampling.

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Complete SWMUs 1 and 2, December 2020 semi-annual monitoring event.

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.