

Williams Petroleum Services, LLC

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January 7, 2015

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

Re: Quarterly Update – 4th 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 October 1 through December 31, 2014.

Description of Activities

- During the quarter, resolved with Mr. Greg McCabe (EPA Risk Assessor) to resolve the Human Health Risk Assessment (HHRA) Addendum methods for evaluating the chromium VI and organic lead data. On November 26, 2014, submitted the HHRA Addendum to USEPA.
- In accordance with the August 12, 2014 LNAPL CMS Work Plan Addendum, continued to monitor the LNAPL thickness and recovery in wells with ongoing removal by passive skimmers and bailing.
- Per the SWMU-16 CMS Work Plan scope of work dated August 12, 2014, process sewer camera inspections were performed during the week of October 13, 2014.
- 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.

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.

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- Final data collected for the Water Balance CMS Work Plan scope will be presented in the CMS for the FAR. Interim evaluation data will be provided with the 2015 groundwater monitoring program report.
- Data collected from the SWMU-16 CMS Work Plan is being evaluated to determine strategies for interim measures implementation.

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- On October 8, 2014, WPS submitted the 3rd quarter 2014 update to the EPA.
- On November 26, 2014, submitted the HHRA Addendum to USEPA.

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:

- Prepare and submit the scope for 2015 groundwater monitoring event planned for spring 2015.
- 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 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

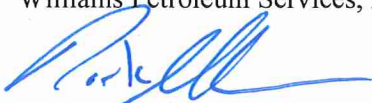
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and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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



Mark A. Gebbia

Manager, Environmental Services CoE

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