

Williams Petroleum Services, LLC

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January 8, 2016

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

Re: Quarterly Update – 4th Quarter 2015
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, 2015.

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 CMS Work Plan Addendum, completed installation of the 4" diameter wells to the west of the museum for the continued evaluation of LNAPL removal efficacy. All wells were equipped with passive bailers and monitoring of fluid levels was initiated.
- On October 8, 2015 submitted the 2015 Groundwater Monitoring Report to USEPA.
- Attended a meeting with KDHE on November 20, 2015 to discuss the potential future regulatory tract of RCRA Corrective Action at the FAR site.
- During the 4th quarter, initiated Interim Measures implementation at the Walnut River AOI. Completed installation of the Permeable Adsorptive Barrier on the lower bank and achieved substantial completion of the drainage improvements on the east side of levee.

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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 October 2, 2015, WPS submitted the 3rd quarter 2015 update to the EPA.
- In phone conversation with Williams and USEPA on November 4, 2015, USEPA discussed the potential for utilizing and RCRA FIRST Toolbox process for advancing the FAR RFI activities to corrective action.
- On November 5, 2015, USEPA provided draft review comments for the Groundwater RFI Report.
- On December 9, 2015 scheduled a meeting for January 20, 2016 with USEPA to discuss the FIRST process for the FAR.

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 USEPA to complete technical review of the RFI documents for the FAR.
- 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.
- Complete the Walnut River AOI Interim Corrective Measures Work Plan. Plans are to complete drainage improvements on east and west sides of levee and install LANPL recovery wells.

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Other Relevant Documentation

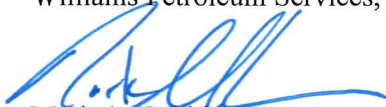
None

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. 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

Director, Environmental Services

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