

Williams Petroleum Services, LLC

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

January 11, 2018

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

Re:

Quarterly Update - 4th Quarter 2017

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 October 1 through December 31, 2017.

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 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.
- On October 19, 2017, APTIM performed the annual landfill cap inspections and maintenance for SWMUs 1, 2, 7, 8, 9, 17, and AOC-D.
- On October 27, 2017, the FAR NPDES report was submitted to the KDHE.

- In correspondence dated November 30, 2017, submitted the CMS Work Plan to USEPA and KDHE.
- In email dated December 1, 2017, APTIM submitted notification to KDHE of SWMU 1 and 2 biannual monitoring.
- During the week of December 11, 2017, performed SWMU 1 and 2 biannual monitoring.
- On December 8, 2017, APTIM received a voice message and WPS received an email from Miles Stott inquiring about the Nustar release.
- On December 12, 2017 a conference call was held with KDHE, WPS, and APTIM regarding the Nustar release.
- In email dated December 12, 2017, APTIM requested an electronic copy of the Nustar report submitted to Ms. Deanna Ross of KDHE-BER.
- In email dated December 15, 2017, KDHE-BER provided APTIM a copy of the Nustar release report.
- In email correspondence dated December 19, 2017, WPS submitted the Nustar report to USEPA and KDHE and provided additional clarifications regarding the Nustar release.

Summary of All Findings

• WPS submittal of clarifications regarding Nustar release

Summaries of All EPA Approved Changes

None.

Summaries of All Contacts

- On October 3, 2017, WPS submitted the 3rd quarter 2017 update to the USEPA and KDHE.
- In email correspondence dated November 28, 2017, APTIM contacted Ms. Deanna Ross with the KDHE BER regarding an update on the Nustar release at the west side of the FAR being handled by KDHE-BER.
- In email correspondence dated December 5, 2017, Ms. Ross responded to APTIM indicating that KDHE had received a report from Nustar, but that KDHE was not aware of any additional remedial plans.
- In email dated December 1, 2017, APTIM submitted notification to KDHE of SWMU 1 and 2 biannual monitoring.

- On December 8, 2017, APTIM received a voice message and WPS received an email from Miles Stott inquiring about the Nustar release.
- On December 12, 2017 a conference call was held with KDHE, WPS, and APTIM regarding the Nustar release.
- On December 12, 2017, APTIM requested an electronic copy of the Nustar report submitted to Ms. Deanna Ross of KDHE-BER.
- On December 15, 2017, KDHE provided APTIM a copy of the Nustar release report.
- In email correspondence dated December 19, 2017, WPS submitted the Nustar report to USEPA and KDHE and provided additional clarifications regarding the Nustar release.

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 Walnut River Interim Measures monitoring.
- Prepare the SWMU 1 and 2 Annual Monitoring Report.

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

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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

Director, Environmental Services CoE

c: Carrie Ridley, KDHE

Lee Andrews, Williams Petroleum Services, LLC

David Way, Aptim Environmental & Infrastructure, Inc.