



Williams Petroleum Services, LLC

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January 19, 2019

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

Re: Quarterly Update – 4th Quarter 2018
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, 2018.

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 October 8, 2018, the 3rd quarter 2018 NPDES report was submitted to KDHE.
- In correspondence dated October 10, 2018, the 3rd quarter 2018 Quarterly Report was submitted to the USEPA and KDHE.
- In correspondence dated October 11, 2018, a right of way permit application was approved by the Kansas Department of Transportation for the pilot test at the right of way on the east side of Highway 77.

- In November 2018, installed the pilot test cells for both the PlumeStop and biosparge tests per the CMS Work Plan. Following installation, baseline sampling was performed. Final design of the PlumeStop pilot test is being completed based on the results of the baseline sampling.
- In November and December 2018, completed the NuStar AOC field activities according to the Sampling and Analysis Plan.
- In December 2018, initiated biosparge pilot testing activities.
- In December 2018, completed the biannual groundwater monitoring at SWMU 1 and 2.
- In December 2018, 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 December 2018, completed 4th quarterly NPDES sampling.

Summary of All Findings

- As outlined in the CMS Work Plan, pilot testing activities are anticipated to take several months and results of the testing will be compiled into a status report at the conclusion of that testing.
- Results from the NuStar AOC sampling and analysis are being compiled for presentation in a report to USEPA and KDHE.

Summaries of All EPA/KDHE Approved Changes

- None.

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:

- Continue LNAPL monitoring and removal.
- Continue quarterly NPDES monitoring.

- Continue pilot test activities.
- Complete the NuStar AOC reporting activities.

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, Inc.