

January 29, 2021

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

Re: Quarterly Update – 4th 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 October 1 through December 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 October 15, 2020, the 3rd quarter 2020 NPDES report was submitted to the Kansas Department of Health and Environment (KDHE).
- In correspondence dated October 19, 2020, the 3rd quarter 2020 Quarterly Report was submitted to the USEPA and KDHE.
- On October 23, 2020, held a call with Mr. Gary Blackburn of the KDHE to discuss advancing the Environmental Indicator determinations for the FAR.
- Completed the annual groundwater monitoring event for SWMUs 1 and 2 the week of December 14.
- In correspondence dated December 30, 2020, provided a work plan for assessing the feasibility of phytoremediation techniques as part of the CMS. The work plan outlined necessary data collection activities to support the evaluation.

*Summary of All Findings*

- None.

*Summaries of All EPA/KDHE Approved Changes*

- In correspondence dated October 27, 2020, KDHE provided approval of the 2019 Groundwater Monitoring Report.
- In correspondence dated October 29, 2020, KDHE provided approval of the SWMU 1 and 2 Semi-Annual Post Closure Groundwater Monitoring Report.

*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:

- Initiate the phytoremediation field work and evaluation for the CMS.
- 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.

*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

**Williams Petroleum Services, LLC**

January 29, 2021

Page 3

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.