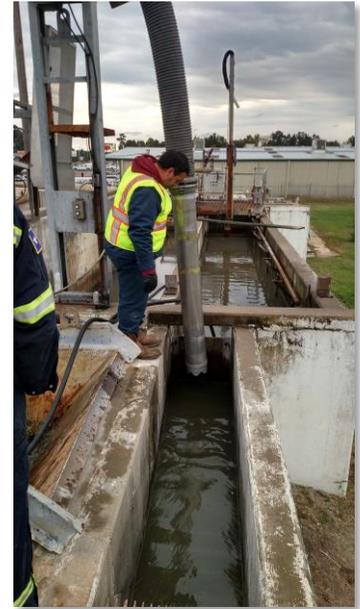




FUEL RELEASE EMERGENCY RESPONSE, ASSESSMENT, AND REMEDIATION TRUCK STOP, CLEVELAND, TEXAS

EMERGENCY RESPONSE AND INITIAL ABATEMENT:

Following the release of an unknown volume of diesel fuel in November 2018 to the municipal wastewater treatment system in Cleveland, TX, a major national Truck Stop client retained Wright Environmental Services (Wright) to oversee and manage emergency response measures and initial abatement efforts. A Wright representative immediately notified the appropriate regulatory authorities, including the Texas Commission on Environmental Quality (TCEQ), the United States Environmental Protection Agency (USEPA), and the National Response Center (NRC) of the release. The USEPA and NRC were notified as the potential existed for the impacts to reach the East Fork San Jacinto River. Wright personnel teamed up with a local emergency response contractor and immediately mobilized to the site to assess the scope of the release and to direct field personnel during the response to prevent further damage to the municipal wastewater system. Initial abatement efforts focused on the recovery of free-phase diesel product and impacted fluids and sludges from the wastewater treatment plant (WWTP), high pressure jet cleaning of the sanitary sewer lines between the site and the WWTP, and recovery of free product from the underground storage tank (UST) system tank pit and components at the release site. Over a six-day period, approximately 110,000 gallons of free product, impacted fluids, and WWTP sludges were recovered to six (6) 20,000-gallon frac tanks temporarily located at the site before being properly disposed of at various disposal facilities in accordance with all local, state, and federal regulations.



During the recovery efforts, Wright personnel successfully facilitated multiple lines of communication between municipal workers monitoring the WWTP's recovery, repair contractors addressing the source of the release, and release site personnel to respond to the release quickly and effectively. The centralized and focused management by Wright ensured that the emergency response efforts progressed with as little disruption to the municipal wastewater facility as possible while simultaneously ensuring efficiency to protect the client's interests. The results of the emergency response efforts and initial abatement were documented in written reports to the City and TCEQ.

SITE ASSESSMENT AND REMEDIATION:

Following completion of emergency response efforts, Wright remained on the project to complete follow-up release determination reporting, site assessments, and site remediation activities as required by the TCEQ. Wright completed initial release determination reporting immediately following the emergency response in a Release Determination Report documenting the known release. As a result, the TCEQ issued a Leaking Petroleum Storage Tank (LPST) number for the site and directed the completion of a risk-based site assessment per TCEQ guidance RG-523 and a Drinking Water Survey Report to assess potential impacts from the release to soil and groundwater.



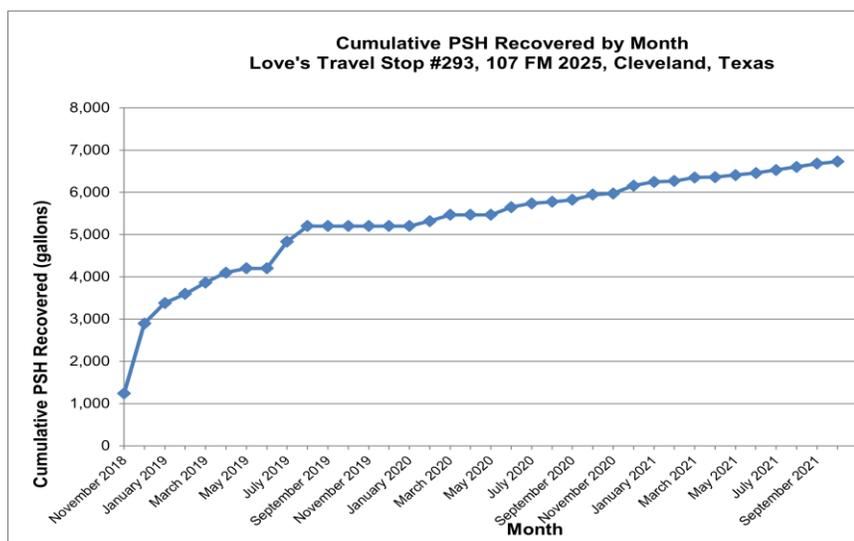
Risk-Based Assessment field activities were completed by Wright in March 2019 and included the collection of soil samples, installation and sampling of four groundwater monitoring wells, and completion of drinking water and receptor surveys. The risk-based assessment indicated that groundwater in the vicinity of the release was impacted by petroleum hydrocarbon based on concentrations of benzene in excess of applicable action levels. However, no drinking water sources, or receptors appeared to be impacted. The risk-based assessment also documented the presence of free-phase petroleum from the initial release remaining on the two tank pit observation wells associated with

the site UST system. In response to the results of the risk-based assessment, the TCEQ directed ongoing groundwater monitoring at the site and the continuation of free product recovery efforts until such time the free product could be recovered to the extent practicable. Wright has continued groundwater monitoring at the direction of the TCEQ completing four quarterly monitoring events followed by two semi-annual monitoring events and submitting the requisite annual groundwater monitoring reports. Results of the recent groundwater monitoring events indicate that groundwater is no longer impacted above applicable action levels.



Concurrent to the various site assessments and groundwater monitoring activities, Wright has also maintained free product recovery efforts at the site to recover remaining free product observed in the UST system tank pit following the release and initial emergency response and abatement. Wright completed 15 free product recovery events between November 2018 and October 2019 using a mobile water treatment system outfitted with an oil/water separator capable of collecting total fluids from the affected tank pit wells, separating the free-phase product, treating the recovered water through a carbon filtration system, and discharging the treating water under the parameters of a general discharge permit issued by the TCEQ. This system had the advantage of rapidly reducing the observed thickness of remaining free produce observed in the wells from a maximum of 1.36 feet to 0.18 feet while eliminating the need to dispose of recovered water at an offsite facility. The free product recovered was then disposed of at an appropriate recycling facility.

To more effectively target recovery of the remaining thickness of free product observed at the site, Wright designed, constructed, and install two automated, solar-powered, active belt skimmer systems at the two UST tank pit observations wells. Each skimmer unit included a small oil/water separator making it no longer necessary to pump, store, treat or discharge recovered groundwater. Total fluids recovered on each skimmer belt are passed through the oil/water separator units and recovered groundwater is returned to the tank pit observation well (TPOW) while recovered PSH was transferred to dedicated 275-gallon totes equipped with an emergency shutoff float switch for temporary storage. These systems have the advantage of being mobile, self-sufficient, and highly effective at recovering minor thicknesses of product while eliminating excess waste requiring disposal. The belt skimmer systems were successful at reducing the remaining free product to thicknesses that are de minimus or at times non-detectable in each of the TPOWs. Including initial emergency response efforts and the combination if two additional free product recovery technologies, Wright has successfully recovered over 6,700 gallons of free product from the site.



SITE CLOSURE:

Having successfully completed initial emergency response and abatement measures, risk-based site assessments, groundwater monitoring, and free product recovery efforts to the maximum extent practicable, Wright has requested from the TCEQ that the site be considered for closure and no further action status in a Site Closure Request. As of this writing, the TCEQ's response is pending.