Douglas E Drouare, CPG
USEPA, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

August 20, 2015
Revised June 21, 2016

RE: Leaking Underground Storage Tank
Sac & Fox Truck Stop
1346 US Hwy 75
Powhattan, Kansas 66527

Dear Mr. Drouare,

Sac and Fox Truckstop was built in 1998 by M.A.C. Corporation, Independence MO. Robert Andrew who is still currently with M.A.C. was involved at the time of construction. Four fuel tanks were installed at that time. Documentation (Attachment 1) show that the tanks were XERXES double wall tanks with a 30 Year warranty.

Here is a timeline of events and actions taken regarding the ruptured fuel tank at Sac and Fox Truck Stop. (Attachment 2) is a diagram of the Truck Stop and where tanks set on the property for reference.

- July 20, 2015 Phone call from staff stating tank alarm was going off at approximately 9:30 p.m. Amanda responded by having them ck fuel levels and the North tank was below alarm level and needed fuel to siphon from the South tank. A few minutes later staff calls back and says alarm is still going off, Amanda then has them check water levels. At this time we now have a vehicle in the parking lot that will not stay running. Immediately all pumps are shut off at approximately 9:35p.m. Any car fueling with midgrade fuel during that 5 minute period would not run. Police, fire, emergency management and all other personnel needed responded. Parking lot was evacuated for everyones safety until we could assess the situation. We knew water was coming from somewhere but had no idea where from. Spent lots of time trying to determine water source. Our tank monitoring print out showed no water in the fuel at the beginning of the day.

- July 22, 2015 Robert Trump with Adler Tank Rentals, brought a Frac tank and pumped approximately 19,000 gallons of fuel and water into the Frac tank. At this time we could tell tank was ruptured and the probe was stuck in the ground from the pressure and that ground water was the responsible water source. At this time fuel needs to separate from water for 2-3 days to determine how much fuel was recovered. Then samples need to be sent for testing.

- July 24, 2015 Robert Trump with Adler returns to take samples of fuel and water for testing. We also determine that on July 20, 2015 Midgrade tank totals were

5,882.00 gallons, we sold 2185.11 gallons of midgrade fuel and that 2357.00 gallons of midgrade fuel was in the Frac tank, (Attachment 3) leaving 1339.89 gallons of midgrade fuel unaccounted for. Water and fuel samples are taken to Pace Analytical.

- July 27, 2015 Results of fuel and water samples come back from Pace Analytical. (Attachment 4)

- Fuel can be recovered but need to determine who will recover fuel from Frac tank and how to properly handle the contaminated water. Activated carbon vs. reclaim facility.

- July 27, 2015 Tankology Inc. comes to scope tanks and determine possible cause and damage. North midgrade tank is ruptured and south midgrade has a crack on top where vent pipe had been run over recently. South and north tanks are manifolded. Appears water pressure from excessive ground water caused pea gravel to erode, allowing tank to rupture.

- August 6, 2015 Estimates come from Robert Trump with Adler to determine procedure of disposing of contaminated water.

- August 11, 2015 Tribal Council approved to have midgrade fuel recovered from Frac tank by HAAG oil and to have contaminated water hauled to a reclaim facility.

- August 18, 2015 2000 gallons of fuel is recovered from Frac tank and blended with 1250 gallons of premium fuel to make fuel the correct octane level. (Attachment 5)

- August 19, 2015 Adler hauls contaminated water to reclaiming facility (Attachment 6). Also delivers a 300 gallon bladder for the ongoing process of reclaiming fuel from ruptured tank. Waiting on estimate to purchase a diaphragm pump and a compressor.

- At this time we know that there is still fuel in the ground because we have stuck the tank. Our thought is that it is in overfill tanks and that we will recover most of the missing fuel.

- Ongoing, will now start to pump bi-weekly out of ground to recover any fuel missing. Will store in bladder, let fuel separate from water and keep track of all product recovered each time. This procedure could take up to 12 months or until we can no longer recover any more fuel. After a period of time when there is no more recovery of product we will need to have soil tested.

- At this time we are possibly considering properly abandoning the North ruptured tank which is no longer in use.

- August 27, 2015 Ethan with PEI capped off manifold to south tank so we could start operating north tank. Reclaimed 442 gallons of fuel. (tank reading) (Attachment 7)

- August 28, 2015 Josh with PEI flushed fuel lines and recovered 150 gallons of fuel. Remaining gallons of fuel unaccounted for now totaling 746 gallons.

- Estimate received 9-21-2015 from Total Petroleum Services for Consultant, Geologist and site characterization. Waiting for Tribal Councils approval to continue with clean up/compliance efforts and free product recovery.

- Ace North American Claims is insurance covering remediation only. Contact Brian Hong 866-635-5698.

- Sac and Fox Truck Stop has been operational since incident on 7-20-2015 excluding the use of the ruptured North midgrade tank.

- November 19, 2015 Geologist take analytical samples for testing and drill for 4 Temporary Piezometers. Robert Trump from Total Petroleum Services, Robert Andrew from M.A.C. Corporation who installed the tanks, Ethan Kappler with P.E.I. and Mark Junker with Tribal EPA were all here. Appears contamination is within the Truck Stop property. Ruptured tank video was viewed by all, video shows a rupture approximately one third of the way up on east side approximately 7-8 inches in diameter. I was to receive test results in 10-12 days.

- January 18, 2016 have not received any results from analytical testing or piezometers. Still no response from Robert Andrew on Xerxes warranty.

- February 16, 2016 Received Site Investigation Report of general soil characteristics of the subsurface and initial impacts to the soil and groundwater due to failing gasoline underground storage tank. Terranext also provided cost to install 5 permanent monitoring wells, collect groundwater samples, complete an initial conceptual site model (CSM), screen and model groundwater data to determine soil vapor inhalation risk at Sac and Fox Truckstop. (Attachment 8)

- February 29, 2016 Meeting onsite at Sac and Fox Truckstop to discuss next steps and overall plan to continue with finalization of remediation and repair or abandonment of ruptured fuel tank. In attendance were Randy Dolifka PEI, William Millard Crawford and Company, Robert Trump Total Petroleum Services, Chris Kinn Geologist, Robert Andrews MAC Corp., Lisa Montgomery Sac and Fox EPA, Gary Bahr Sac and Fox Tribal Council, Theresa Armbruster Sac and Fox Truck Stop Manager, Amanda Kramer Sac and Fox Asst. Manager and VIA phone Anita Ketola ACE Insurance. It was unanimous by all in

attendance that the only way to determine the cause of the ruptured fuel tank would be to investigate the site. After determining the cause, being impact or defect then the decision will be made to either repair the existing Xerxes double wall tank with a 30 year warranty which was installed in 1998 and have it recertified or properly abandon the tank which would be the safest option and install a new tank in a new site. While the tank site is open we will be prepared to deal with free product, define plume and install wells. Initially 5 wells were suggested but was determined 2 would be sufficient. All work pending estimates and approval from Insurance Companies.

- March 21, 2016 Received estimate to repair ruptured fuel tank.
- April 20, 2016 Robert Trump Total Petroleum Services responds to Region 7.
- April 22, 2016 Insurance needing a breakdown of proposed estimate and an estimate for a replacement tank from M.A.C. Corp.
- May 11, 2016 Currently waiting for Estimates to install new tank if that determination is made immediately following the excavation of the northern area of the tank exposing the ruptured tank.
- May 17, 2016 Received estimate from Randy Dolifka PEI for new tank not sure of status on estimate from Robert Andrew MAC Corp.
- May 20, 2016 Received revised estimate from M.A.C. Corp.
- May 25, 2016 Tribal Council approved the excavation work proposed by M.A.C. Corp. Need to contact Robert Andrew to confirm a start date.
- June 8, 2016 Robert Andrew, M.A.C. Corp. still trying to coordinate with XERXES.
- June 16, 2016 M.A.C. Corp has a start date July 11, 2016 need to confirm with all involved.
- June 20, 2016 Confirmed with M.A.C. Corp. Everyone would be available for July 11, 2016 start date.
- June 21, 2016 contacted Robert Trump about providing Region 7 with an acceptable form of reporting.
- July 10, 2016 Robert Trump with Total Petroleum comes to start removing water to prepare for excavation on July 11, 2016 only to discover excessive amounts of water. Three FRAC tanks were needed for 60,000 plus gallons of contaminated water.

- July 11, 2016 Robert Andrew M.A.C. Corp starts preparing for excavation but due to large amounts of rain and excessive rain in the forecast suggests we delay all work. Rescheduled for week of July 26, 2016.

- July 15, 2016 Analytical results from water in three FRAC tanks are available. (Attachment #8)

- July 26, 2016 Week of. Partially expose ruptured fuel tank on East end enough to see that it IS NOT a red XERXES fuel tank. The tank is white and it is a Containment Solutions tank. All work is once again postponed. Prior to all of this Xerxes nor Containment Solutions had any records of tanks at our Truck Stop. Once we provided Containment Solutions with Serial numbers then they acknowledge us having those tanks.

- August 15, 2016 Week of. Completion of exposing ruptured fuel tank finally happens with everyone required in attendance. Robert Andrew M.A.C. Corp, Knudeson Construction sub contractor for M.A.C., Kyle Minden Central Region Engineering Manager, William Millard Crawford and Company, Matthew Cansen ACE/CHUBB, Gary Bahr Sac and Fox Tribal Council, Total Petroleum to assist with continued water removal and two Field Service Technicians from Containment Solutions. Containment Solutions technicians prepared and opened the east end of the ruptured fuel tank. On the SE side of the tank was approximately a five foot section of the fiberglass tank that had pulled away from the frame laying on top of the gravel underneath the rupture. At this time it was determined by Containment Solutions Field Service Techs that the tank WAS NOT Repairable. Time Line to receive a new fuel tank 4 months.

- September 6, 2016 Geologist installs 8 monitoring wells. Attachment showing well locations on the property. Geologist will return for sampling week of September 19, 2016. Sampling report expected by the first week of October 2016. (Attachment #9)

- September 1, 2016 Tribal Council decides we are no longer waiting on Insurance Companies to decide who is covering what, that we have been more than cooperative with their demands which have caused this situation to accrue a lot of unnecessary cost that they now want to fight over who is responsible for paying.

- September 6, 2016 Total Petroleum starts hauling off contaminated water from FRAC tanks to reclaim facility. Takes until September 12, 2016 to complete. Recovered free product from FRAC tank #1 was 5 inches. Recovered free product from FRAC tank #2 was 1 inch. Nothing was recovered from FRAC tank #3. The recovered free product should cover the 746 gallons of product not accounted for prior to this date.

- September 19, 2016 Scheduled conference call with Sac and Fox EPA, Region 7 and Theresa Armbruster to go over this information and to update.

Sincerely,

Theresa Armbruster
Manager, Sac and Fox Truck Stop