I. Facility Description

A. Description of Facility Processes and Activities

The JC Hunt site is located at the north side of Wolf Creek Pass approximately 4.6 miles south of the city limits of South Fork, CO. On November 14, 2009, a JC Hunt Tanker truck released approximately 3,800 gallons of unleaded gasoline on the west shoulder of the road. An unknown portion of that gasoline has traveled under the road to the east and is present in the groundwater of wetlands contiguous with the South Fork of the Rio Grande River. The groundwater is being accessed at that point by a series of trenches, with the gasoline and groundwater present collected by vacuum truck and transported to an offsite location in 16,000 gallon storage containers at 2005N West Highway 160 South Fork, CO. The water is being aerated in the tanks for stripping of benzene.

B. Identification/EPA Classification and Quantities of Hazardous Waste

The waste to be treated onsite to meet disposal facility acceptance standards consists of an undetermined quantity for a period of time to be determined by site conditions as the remediation progresses. The planned amount of water will approach at a minimum of 100,000 gallons. Water will be transported and disposed of at the Alamosa POTW as non-hazardous waste after it meets the POTW standards for acceptance. The aerated water is assumed to carry an EPA waste code of D018 for benzene.

C. Description of Hazardous Waste Management Units

The water is presently contained in double walled closed- top steel 16,000 gallon frac tank containers. Water will be aerated with compressed air for the stripping of benzene from the water. The containers are inspected weekly and the site is considered a 90-day storage area for hazardous waste. The tanks are labeled with hazardous waste stickers containing the appropriate information concerning the waste. Although the waste has not exhibited ignitable characteristics, and headspace analysis above the tanks have not detected any LEL %, No Smoking signs have been posted and the waste is isolated from any ignition sources.

SELECTING WASTE ANALYSIS PARAMETERS

A. Criteria and Rationale for Parameter Selection

Based on product knowledge, the liquid waste will be analyzed for VOC's by EPA Method 8260B. This method will also provide for analysis of possible VOC UHC's for the waste.

II. SELECTING SAMPLING PROCEDURES

A. Sampling Strategies and Equipment

Sample procedures are as follows:

Each tank container will be grab sampled at the surface after it is filled with liquid waste. No liquid waste will be added to the tank after sampling. Samples will be collected in new 40-ml VOA vials. Two VOA vials will be submitted to the Laboratory for each sample collected, with standard chain-of-custody and sample handling and preservation procedures followed.

B. Sample Preservation and Storage

Individual samples will be collected in new, unused 40-ml VOA vials labeled, and chilled as necessary for submission to the analytical laboratory for Total VOCs (EPA Method 8260B)

C. Sampling QA/QC Procedures

All sampling conducted for the purpose of characterizing the waste will follow appropriate QA/QC protocol, including standard chain of custody, labeling and storage procedures for delivery to the laboratory.

D. Health and Safety Protocols

All personnel involved in waste handling and sampling will have current OSHA 40-hr HAZWOPER training. Proper PPE for worker protection will be worn during waste mixing and sampling activities.

III. LABORATORY SELECTION

The designated analytical laboratory is Technology Laboratories, Ft. Collins, CO.

IV. SELECTING WASTE RE-EVALUATION PROCEDURES

If the treated waste fails LDR standards for Total Benzene the tank container will be reaerated and resampled until LDR standards are met.

V. SPECIAL PROCEDURAL REQUIREMENTS

A. Procedures for Receiving Waste from Off-site Generators

No waste from off-site generators will be received at the site.

B. Procedures for Ignitable, Reactive, and Incompatible Wastes

The waste stream discussed in this WAP does not exhibit any of the above mentioned characteristics and is not expected to exhibit any of these characteristics during treatment.

C. Procedures to Ensure Compliance with LDR Requirements

All liquid waste is anticipated to meet LDR treatment standards before shipment offsite to be disposed of at the Alamosa POTW, although disposal at the Alamosa POTW does not require that the waste meets LDR treatment standards. An LDR certification, including analytical records to document treatment below the LDR standard, will be sent to the receiving facility for proper waste profiling and acceptance.

Documents associated with the treatment, analysis and disposal of the waste will be maintained by JC Hunt for a minimum of five years after disposal is completed.