



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources  
Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

May 18, 2017

Mr. Charles Giesler  
Clark County Department of Aviation  
McCarran International Airport  
5757 Wayne Newton Boulevard  
P.O. Box 11005  
Las Vegas, Nevada 89111-1005

**Subject: Corrective Action Plan Concurrence**

**Facility: National Car Rental Facility  
5233 Rent A Car Road  
Las Vegas, NV 89119  
APN: 162-27-201-010**

Facility ID: **8-000416**  
Petroleum Fund ID: **2004000039**

Dear Mr. Giesler:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the *Corrective Action Plan* (CAP) for the above referenced facility (Site) dated October 18, 2016, and prepared by Keith Houk, Certified Environmental Manager (CEM), of Converse Consultants (Converse) on behalf of the Clark County Department of Aviation the responsible party for the former National Car Rental Facility (Site). The CAP was received in our Las Vegas office on November 3, 2016.

This letter provides NDEP concurrence with the CAP (per NAC 445A.227 and 445A.2273) subject to the conditions included in this letter, and requests that a Start-up and As-built Report documenting implementation of the CAP be submitted in 45 days from the startup of the PulseOx remediation system (PulseOx). This letter also requests that:

1. Remediation progress reports be submitted quarterly, within 30 days of receipt of applicable laboratory data but not later than the 28<sup>th</sup> of the month following the completed reporting period. The reports are to be included with the quarterly groundwater monitoring reports;
2. A copy of the final design of the PulseOx System be submitted within 30 days of the date of this letter; and
3. A Start-up and Performance Monitoring Plan be submitted within 45 days of the date of this letter.

As explained in detail in the CAP, the remediation plan will address the following release areas at the Site and consists of the following elements:

**1. Location:**

The area to be treated is a result of a release from a damaged fuel line associated with the former fuel dispensing island. The release was discovered following UST system removal activities during site decommissioning. The release of petroleum hydrocarbons impacted both soil and groundwater. The depth to groundwater is generally 8 to 14 feet below the ground surface (bgs).

**2. Constituents of Concern:**

The constituents of concern include benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl tertiary-butyl ether (MtBE) with concentrations of tertiary butyl-alcohol (tBA), a probable daughter product from the degradation of MtBE. Benzene, MtBE, and tBA occur in the shallow groundwater horizons from approximately 8 to 75 feet bgs at concentrations ranging from 2.9 to 210 µg/L (benzene), 3.2 to 2,400 µg/L (MtBE), and 33 to 1,600 µg/L (tBA) (Second Quarter 2016). Previous remedial activities conducted at the Site, included several groundwater overpurgings events targeted within the shallow zone and operation of an air sparge (AS) and soil vapor extraction (VE) remediation system targeting the various water-bearing zones. Additionally, following UST System removal activities, 292.42 tons of impacted soil were excavated and transported off site.

**3. Cleanup Approach:**

PulseOx™ was selected as the remedy for the Site to replace the existing AS/VE remediation system. The proposed PulseOx system will consist of seventeen (17) injection wells constructed to a total depth of approximately 65 feet bgs spaced on a 20-foot spacing. A total of twelve injection wells will be installed within the shallow water-bearing zone while the remaining five injection wells will target the “intermediate” and “deeper” water-bearing zones. Injection conveyance piping connecting these wells will be installed below grade. Performance monitoring during the start-up period (6 months) will be conducted monthly in monitoring wells MW-2, MW-16 (30, 42, and 60 feet bgs), MW-18, MW-22 (30, 48, and 60 feet bgs), and MW-23 (30, 40, and 62 feet bgs) through analysis of groundwater samples for BTEX/MtBE, and tBA. Other field parameters (e.g., dissolved oxygen [DO] and oxidation reduction potential [ORP]) will also be collected during the monthly monitoring events.

**4. Cleanup Goals:**

As stated in the CAP, the cleanup goals for the Site are to reduce petroleum hydrocarbon concentrations in soil and groundwater to the State action levels. According to the CAP, if these goals become unattainable it may become necessary to pursue a groundwater exemption closure via NAC 445A.22725 (2).

**5. Performance Monitoring:**

According to the CAP, operation and maintenance of the equipment will occur on a weekly basis. Groundwater samples will be collected and submitted for laboratory analysis as required by the injection permit. Additionally, quarterly field measurements of DO and ORP will also help to evaluate clean-up activities.

NDEP concurs with the CAP conclusions to initiate design and implementation of the PulseOx remediation system at the former National RAC facility. Please be aware that NDEP expects development, submittal, and use of the following documents once these documents have been reviewed and concurred upon to assist in proper execution of the discussed remedy:

1. **Final Design & Bid Specifications** – to be submitted within 90 days but not later than **August 18, 2017** of CAP concurrence to provide the engineered design that is intended to accomplish the goals stated in the CAP and allow for vendors to bid on specific components, equipment, and system installation and start-up;
2. **Start-up and Performance Monitoring Plan** – to be submitted within 90 days of Final Design and Bid Specification concurrence (and prior to remediation system start-up) to provide a description of the steps proposed to initiate (start-up) each major component of the remedy including system monitoring as well as describe how the remediation system will be monitored (e.g., PID, flow rate, etc.) and adjusted periodically over the life of the project to maintain optimal

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- remediation system performance;
3. **Sampling and Analysis Plan (SAP)** - to be submitted within 90 days of Final Design and Bid Specification concurrence (and prior to remediation system start-up) and likely concurrent with but separate from the Start-up and Performance Monitoring Plan to outline the frequency; field methods to be used; laboratory analysis and laboratories to be used; and Quality Assurance/Quality Control measures to be used for the routine (e.g., quarterly, semi-annual, annual) sampling of groundwater, soil, free product, and other media during project work. It should be noted that if a SAP already exists, it may need to be modified to adapt to the contemplated remedy;
  4. **Start-up and As-built Report** – to be submitted within 45 days of remediation system start-up to document the successful start-up of the remediation system(s); describe any problems or difficulties encountered during system installation or start-up; outline and document any changes to the concurred upon Final Design and the Start-up and Performance Monitoring Plan; and document the actual remediation system configuration and layout including scaled drawings of plan and cross-sectional views; and
  5. **Operation and Maintenance (O & M) Plan/Manual(s)** – to be submitted within 90 days of remediation system start-up to outline the planned remediation system operation and planned routine maintenance to be conducted to keep the remediation system(s) operating optimally. NDEP expects any planned maintenance activities to be performed during anticipated and scheduled system shut downs as/if practicable to permit as much up-time as possible. The O & M Plan/Manual(s) are routinely required as a condition of various permits including NPDES Discharge Permit, Groundwater Protection Permit, Air Quality Permit, etc.

**This letter provides NDEP concurrence with the CAP.** This concurrence letter pertains to the subject CAP which is focused at remediation of the source area and groundwater zones within the former gasoline dispenser area. Additional corrective action measures may occur at a later date if necessary depending on concentration trends and system performance. The additional corrective actions may be managed through submittal of an addendum to this CAP. NDEP looks forward to implementation of the contemplated remedy at the National RAC Site as soon as practicable.

Please contact the undersigned in our Las Vegas office by telephone at (702) 486-2850, ext. 240 or via e-mail at [rheppe@ndep.nv.gov](mailto:rheppe@ndep.nv.gov) if you have any questions or concerns regarding the contents of this letter.

Sincerely,



Rex S. Heppe, CEM, PG  
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Remediation and Leaking UST Branch  
Bureau of Corrective Actions  
NDEP - Las Vegas Office

RSH:rsh

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Adjoining Property Owners

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