


STATEMENT OF JASON HOFFMAN, CEM #1904

I am the Certified Environmental Manager (CEM) representing Avis Budget Car Rental (ABCR), the responsible party for the Avis Rent a Car Facility at McCarran International Airport, 5164 Rent-A-Car Road, Las Vegas, Nevada (Facility ID #8-000217, Petroleum Fund ID #2008000005), and I am making the following assertions in support of the Appeal of ABCR of the October 15, 2018 Final Agency Action of the Nevada Division of Environmental Protection Denying the Request to Conduct Additional Groundwater Remedial Activities.

- In order to monitor the stability of the offsite commingled methyl tert-butyl ether (MTBE) plume, the Nevada Division of Environmental Protection requires collection and analysis of groundwater samples from 36 monitoring wells on a semi-annual basis and three monitoring wells on an annual basis. The NDEP's required monitoring program for the offsite area is summarized in Attachment A. The corresponding annual cost to monitor groundwater in the offsite area is approximately \$50,000.
- If active remediation of the offsite MTBE plume is not performed, the current annual monitoring cost is unlikely to change over the next 10 to 20 years. Accordingly, the estimated cost of monitored natural attenuation of the offsite MTBE plume, until MTBE concentrations reduce to below the Nevada Division of Environmental Protection's site-specific action level of 200 µg/L, is approximately \$750,000.
- In the *Addendum to Offsite Corrective Action Plan For the Commingled MTBE Plume* dated September 27, 2018 (the CAP Addendum), I made recommendations to expedite progress of the case toward closure through the implementation of a groundwater cleanup alternative to cost-effectively reduce MTBE concentrations in the offsite area.
- The CAP Addendum proposes one year of active remediation and concurrent sampling to monitor the effectiveness of the remediation. The forecasted cost to implement the CAP Addendum, including costs to remediate, monitor remediation effectiveness, and conduct one year of post-remediation verification monitoring is approximately \$150,000.
- Implementation of the CAP Addendum is likely to significantly reduce the lifecycle costs to progress this case to closure.
- ABCR currently has approximately \$2,182,757.32 remaining in its Petroleum Fund Account; more than enough money to implement the recommended remedial actions in the CAP Addendum.

JURAT: I, Jason Hoffman, hereby certify that I am responsible for the services in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulation and ordinances.


Jason Hoffman, CEM #1904 (exp. 1/26/19)
Associate Geologist
Broadbent & Associates, Inc.

Dated: October 24, 2018

Attachment A
Groundwater Sampling Schedule for Offsite Area
McCarran International Airport

Well Designation	Monitored Zone	NDEP Concurred Sample Frequency	Comment
OMW-34	Shallow	Annual	Off-site well to define plume extent and migration.
OMW-42	Shallow	Annual	Off-site well to define plume extent and migration.
OMW-43	Shallow	Annual	Off-site well to define plume extent and migration.
OMW-43-30	Shallow	Semi-annual	Off-site well to define plume extent and migration.
OMW-43-45	Intermediate	Semi-annual	Off-site well to define plume extent and migration.
OMW-43-60	Deep	Semi-annual	Off-site well to define plume extent and migration.
OMW-43-75	Deep	Semi-annual	Off-site well to define plume extent and migration.
OMW-44-52	Intermediate	Semi-annual	Only downgradient intermediate well from PMW-14-48 which is currently showing increasing MtBE and tBA concentrations. Plume definition and migration.
OMW-48-30	Shallow	Semi-annual	Off-site well to define plume extent and migration.
OMW-48-45	Intermediate	Semi-annual	Off-site well to define plume extent and migration.
OMW-48-65	Deep	Semi-annual	Off-site well to define plume extent and migration.
OMW-68-35	Shallow	Semi-annual	Off-site well to define plume extent and migration.
OMW-68-50	Intermediate	Semi-annual	Off-site well to define plume extent and migration.
OMW-68-65	Deep	Semi-annual	Off-site well to define plume extent and migration.
OMW-70-30	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-70-45	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-70-60	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-71-30	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-71-45	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-71-60	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-72-39	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-72-59	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-72-77	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-73-32	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-73-57	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-73-73	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-74-41	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-74-61	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-74-72	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-75-39	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-75-61	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.

Attachment A
 Groundwater Sampling Schedule for Offsite Area
 McCarran International Airport

Well Designation	Monitored Zone	NDEP Concurred Sample Frequency	Comment
OMW-75-76	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-76-40	Shallow	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-76-60	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-76-72	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-78-57	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-79-52	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-79-79	Deep	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.
OMW-80-57	Intermediate	Semi-annual	Off-site well to define plume extent and migration. Trend analysis consideration.