

# EXHIBIT 11

NDEP's  
October 15, 2018  
Letter

# EXHIBIT 11



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

October 15, 2018

Ms. Rose Pelino, P.E.  
Corporate Facilities  
Avis Budget Group, Inc.  
World Headquarters  
6 Sylvan Way  
Parsippany, New Jersey 07054

**Subject: Addendum to Offsite Corrective Action Plan  
For the Commingled MTBE Plume**

**Facility: Avis Rent a Car Facility  
McCarran International Airport  
5164 Rent-A-Car Road  
Las Vegas, NV 89119  
APN No. 162-27-201-005**

**Facility ID: 8-000217  
Petroleum Fund ID: 2008000005**

Dear Ms. Pelino:

The Nevada Division of Environmental Protection (NDEP) has reviewed the *Addendum to Offsite Corrective Action Plan for the Commingled MTBE Plume* (CAP Addendum) dated September 27, 2018, and prepared by Jason Hoffman, Certified Environmental Manager (CEM), of Broadbent & Associates, Inc. (Broadbent) on behalf of Avis Budget Group, Inc. (Avis) for the above-referenced facility (Site). The CAP Addendum was received in our Las Vegas office on October 1, 2018 and proposes installation of remediation wells in the down-gradient portion of the Site and implementation of oxygen releasing compounds and nutrients to enhance natural biodegradation of methyl tertiary-butyl ether (MTBE) in groundwater at the Site.

The CAP Addendum notes that MTBE concentrations in groundwater monitoring wells in the down-gradient portion of the Site continue to exceed the site specific action level (SSAL) of 200 micrograms per liter ( $\mu\text{g/L}$ ). As of December 2017, MTBE concentrations were as high as 1,400  $\mu\text{g/L}$  in monitoring wells near Wilbur Street and Lulu Avenue. Broadbent estimates that the average annual decrease in MTBE concentrations in four of the monitoring wells with the highest concentrations is 16% over the past four years.

The CAP Addendum includes a report from the California State University Chico Department of Chemistry and Biochemistry that indicates bacteria are present at the Site in sufficient numbers for degradation of MTBE. The bacteria can degrade petroleum hydrocarbons under both aerobic conditions and anaerobic conditions, with generally faster degradation rates for the aerobic pathway. Site data suggest that low concentrations of dissolved oxygen (DO), and to a lesser extent slightly lower concentrations of nutrients, may be limiting aerobic degradation.

In the CAP Addendum, Broadbent proposes to install 15 remediation wells along Wilbur Street and near the intersection of Lulu Avenue and Young Street. Broadbent proposes to suspend Oxygen Release

Ms. Rose Pelino, Avis Budget Group, Inc.  
Avis Rent a Car Facility; Facility ID:8-000217  
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Re: Addendum to Offsite Corrective Action Plan  
October 10, 2018, Page 2 of 3

Substrate™ (ORS) sleeves in each remediation well in an attempt to raise the concentrations of DO and nutrients down-gradient from the remediation wells. If successful, rates of MTBE degradation would be expected to increase as a result. Broadbent proposes to implement the ORS sleeves for a period of one year, with replacements at approximately 3-6 months, depending on dissolution rate. Regular monitoring of DO concentrations would be conducted.

NDEP has the following comments regarding the information and proposed actions presented in the CAP Addendum:

- NDEP does not concur with the recommended actions in the CAP Addendum.
- NDEP notes that previous corrective actions addressing up-gradient source areas have successfully reduced concentrations of MTBE and other petroleum hydrocarbons significantly and that remaining concentrations of MTBE are sufficiently decreasing due to natural attenuation (biodegradation). Based on data provided to date, the MTBE plume is not expected to reach any known receptors and the plume does not pose an unacceptable risk to human health and the environment.
- As such, NDEP believes that no remediation of the down-gradient area is necessary at this time, and that the Site is a good candidate for evaluating a groundwater exemption closure.
- Please continue groundwater monitoring and sampling while preparing the following documents in support of an exemption closure:
  - Fate and transport model (BIOSCREEN) and final conceptual site model (CSM) for the commingled plume;
  - BIOSCREEN and final CSM for the Avis source area; and
  - No further action request and presentation for the Site.
- NDEP expects all of the documents listed above to be submitted by **June 30, 2019**.
- NDEP is reviewing several other documents recently submitted on behalf of Avis, and will respond under separate cover. In those response letters, NDEP will provide a revised groundwater sampling plan and due dates for various outstanding submittals.

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

Sincerely,



Ben Moan  
Environmental Scientist III  
Remediation and Leaking UST Branch  
Bureau of Corrective Actions  
NDEP Las Vegas Office

BLM:blm

cc: Jeff Collins, Bureau Chief, NDEP Bureau Corrective Actions, 901 South Stewart Street, Suite 4001, Carson City, NV 89701 [jcollins@ndep.nv.gov](mailto:jcollins@ndep.nv.gov)  
Jonathan McRae, Supervisor, UST and Leaking UST Branch, NDEP Bureau of Corrective Actions, 901 South Stewart Street, Suite 4001, Carson City, NV 89701-5249 [jmcrac@ndep.nv.gov](mailto:jmcrac@ndep.nv.gov)

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Re: Addendum to Offsite Corrective Action Plan  
October 10, 2018, Page 3 of 3

Todd Croft, Supervisor Remediation and Leaking UST Branch, NDEP Bureau of Corrective Actions, 2030 East Flamingo Road, Suite 230, Las Vegas. NV 89119-5163 [tcroft@ndep.nv.gov](mailto:tcroft@ndep.nv.gov)  
Michael Cabble, Supervisor, Petroleum Fund Branch, NDEP Bureau of Corrective Actions, 901 South Stewart Street, Suite 4001, Carson City, NV 89701-5249 [mcabble@ndep.nv.gov](mailto:mcabble@ndep.nv.gov)  
Frederick Perdomo, State of Nevada, Office of the Attorney General, 100 North Carson Street, Carson City, Nevada 89701 [fperdomo@ag.nv.gov](mailto:fperdomo@ag.nv.gov)  
Brian Northam, Environmental Health Supervisor, Environmental Compliance Section, Southern Nevada Health District, 280 South Decatur Boulevard, Las Vegas, NV 89107-2936 [northam@snhdmail.org](mailto:northam@snhdmail.org)  
Ebrahim Juma, Assistant Planning Manager, Water Quality, Clark County Water Quality Reclamation District, 5857 East Flamingo Road, Las Vegas, NV 89122-5507 [ejuma@cleanwaterteam.com](mailto:ejuma@cleanwaterteam.com)  
Herb Sequera, Interim Director of Environmental Health, Southern Nevada Health District, 280 South Decatur Boulevard, Las Vegas, NV 89107 [sequera@snhd.org](mailto:sequera@snhd.org)  
Lynn M. Cintron, Sr. Administrative Assistant, Solid Waste & Compliance, Southern Nevada Health District, 280 South Decatur Boulevard, Las Vegas, NV 89107-2936 [cintron@snhdmail.org](mailto:cintron@snhdmail.org)  
Joseph R. Leedy, Principal Planner, Water Quality, Clark County Water Quality Reclamation District, 5857 East Flamingo Road, Las Vegas, NV 89122-5507 [jleedy@cleanwaterteam.com](mailto:jleedy@cleanwaterteam.com)  
Rose Pelino, Director of Environmental Affairs, Corporate Facilities, Avis Budget Group, Inc. World Headquarters, 6 Sylvan Way, Parsippany, NJ 07054-3826 [rose.pelino@avisbudget.com](mailto:rose.pelino@avisbudget.com)  
Linda Bullen, Bullen Law LLC, 8635 West Sahara Avenue, Suite 454, Las Vegas, NV 89117-5858 [linda@bullenlaw.com](mailto:linda@bullenlaw.com)  
Jason Hoffman, CEM, Broadbent & Associates, Inc., 8 West Pacific Avenue, Henderson, NV 89015-7383 [jhoffman@broadbentinc.com](mailto:jhoffman@broadbentinc.com)  
Kirk Stowers, Broadbent & Associates, Inc., 8 West Pacific Avenue, Henderson, NV 89015-7383 [kstowers@broadbentinc.com](mailto:kstowers@broadbentinc.com)  
Robert Schultz, Geo Blue Consulting, 78 Throckmorton Avenue, Suite 3, Mill Valley, CA 94941-1918 [rschultz@geoblueconsulting.com](mailto:rschultz@geoblueconsulting.com)  
Charles Geisler, Clark County Department of Aviation, McCarran International Airport, 5757 Wayne Newton Boulevard., P.O. Box 11005, Las Vegas, NV 89119-1005 [chuckg@mccarran.com](mailto:chuckg@mccarran.com)  
Michael Nelson, Clark County Department of Aviation, McCarran International Airport, 5757 Wayne Newton Boulevard., P.O. Box 11005, Las Vegas, NV 89119-1005 [michaelne@mccarran.com](mailto:michaelne@mccarran.com)  
John Witucki, Clark County Department of Aviation, McCarran International Airport, 5757 Wayne Newton Boulevard., P.O. Box 11005, Las Vegas, NV 89119-1005 [johnwit@mccarran.com](mailto:johnwit@mccarran.com)  
Keith Houk, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 [khok@converseconsultants.com](mailto:khok@converseconsultants.com)  
Kurt Goebel, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 [kgoebel@converseconsultants.com](mailto:kgoebel@converseconsultants.com)  
Robert Gegenheimer, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 [rgegenheimer@converseconsultants.com](mailto:rgegenheimer@converseconsultants.com)  
Nick Willden, Willden Automotive Group, 1354 Rossini Circle, Henderson, NV 89052 [willdens@cox.net](mailto:willdens@cox.net)  
James Puzey, Holley·Driggs·Walch·Fine·Wray·Puzey·Thompson, 800 South Meadows Parkway, Suite 800, Reno, NV 89521 [jpuzey@nevadafirm.com](mailto:jpuzey@nevadafirm.com)

cc: Clark County Emergency Management, 500 South Grand Central Parkway, 6<sup>th</sup> Floor, P.O. Box 551713, Las Vegas, NV 89155-1713

Nick and David Willden, Willden Automotive Group, 1354 Rossini Circle, Henderson, NV 89052-5552

Adjoining Property Owners

Paradise Gardens, LLC, c/o Tina Walls, Walls Law Firm, 8861 West Sahara Avenue, Suite 220, Las Vegas, NV 89117

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