

EXHIBIT 6

Sensitive Receptor Survey

EXHIBIT 6



8 West Pacific Ave., Henderson, NV 89015

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broadbentinc.com

CREATING SOLUTIONS. BUILDING TRUST.

October 5, 2016

Project No. 95-01-150

Nevada Division of Environmental Protection
2030 E. Flamingo Road, Suite 230
Las Vegas, Nevada 89119

Attention: Mr. Rex Heppe

Subject: Sensitive Receptor Survey, Vicinity of Former Avis (8-000217), National (8-000416) and Payless (8-000006) Car Rental Facilities, McCarran International Airport, Las Vegas, Nevada.

Dear Mr. Heppe:

In a work plan dated July 18, 2016, Broadbent & Associates, Inc. (Broadbent), on behalf of the group of responsible parties for the multiple releases of petroleum hydrocarbons at the former car rental facilities of McCarran International Airport (Avis, 5164 Rent-A-Car Road, Facility ID #8-00217; National, 5233 Rent-A-Car Road, Facility ID #8-000416; and Payless, 5175 Rent-A-Car Road, Facility ID #8-000006) requested approval to prepare a Sensitive Receptor Survey (SRS) to document potential downgradient receptors that may be impacted by migration of groundwater containing dissolved petroleum hydrocarbons. In a letter dated August 2, 2016, the Nevada Division of Environmental Protection (NDEP) approved the work plan. This SRS was prepared with the assistance of the NDEP which provided additional database investigation and ground-truthing of wells in the area in 2008 and re-confirmation of the investigation results in 2016.

Well Search

In 2008, the NDEP conducted a review of active water wells within and beyond the downgradient extent of the dissolved petroleum hydrocarbon groundwater plume using the Las Vegas Valley Water District's (LVVWD) FacilityView program, and follow-up field truthing (i.e., area reconnaissance). The 2008 area reconnaissance was performed in order to confirm and refine the active water well information collected from the LVVWD database. As documented by Ms. Sara Arav-Piper in an e-mail dated December 30, 2008, there were no active water wells, including domestic and municipal wells, west of Spencer Avenue, and the closest active water wells to the commingled plume were four domestic wells located approximately 5,000 feet east and downgradient of the distal end of the plume.

In 2016, the NDEP re-evaluated and updated the 2008 review. As documented by Mr. Rex Heppe in an e-mail dated May 26, 2016, no active water wells are located within 1,000 feet of the groundwater plume and the four domestic wells identified in 2008 are still the only water wells located to the east and downgradient of the plume. As detailed in the NDEP-approved work plan, Broadbent's scope of work for the 2016 SRS did not include an area reconnaissance to confirm the findings of the database search conducted by the NDEP. An area reconnaissance was not conducted because the NDEP determined that an updated field reconnaissance, a door-to-door survey, or other field efforts to locate water wells are not necessary; and that the 2008 field reconnaissance and 2016 database search are

sufficiently protective of potential water wells within the SRS area. The locations of the four domestic wells are depicted on Drawing 1. The driller's logs were obtained from the Nevada Division of Water Resources (DWR) for three of the four wells and are included as Attachment A. The fourth well is not on file with the DWR, but is on file with the Southern Nevada Water Authority Groundwater Monitoring Program (GWMP). Driller's logs are not available from the GWMP. Correspondence from the NDEP is included as Attachment B to this report.

Sensitive Environments

The *NDEP Oxygenated Fuel Corrective Action Guidance*, October 1998, defines a "sensitive environment" as any of the following, within 1,000 feet of the contaminant plume:

- Surface water bodies, including washes that drain to surface water bodies
- Wetlands
- Aquifer recharge zones
- Well fields where groundwater is extracted for municipal or other beneficial use
- Conveyance features of surface water run-off (culverts, box culverts, storm drains, lined and/or unlined channels, etc.) which eventually drain or empty to a sensitive environment

An assessment was performed to evaluate whether sensitive environments are located within 1,000 feet of the dissolved petroleum hydrocarbon plume. Drawing 1 and recent aerial imagery supplied by Google Earth were evaluated for sensitive environments such as surface water bodies, washes that drain to surface water bodies, wetlands, aquifer recharge zones, and well fields where groundwater is extracted for municipal or other beneficial use. The evaluation did not suggest that these sensitive environments are present within 1,000 feet of the groundwater plume. The individual surface storm drain inlets, generally located along roadways, were not evaluated during this investigation. It does not appear likely that groundwater will surface at the property; therefore surface storm drain inlets should not be a receptor for petroleum hydrocarbon impacted water.

Other Criteria

The NDEP may use other criteria to determine whether corrective action is required and to set action levels for certain compounds. These criteria include:

- Completed pathway for human exposure
- Depth to groundwater beneath the site and in the vicinity of the site
- Locations and distance to water wells (any well where water is extracted for human consumption, bathing, swimming, or recreation; irrigation; application to crops; livestock; and/or industrial use) within 1,000 feet of the contaminant plume
- Locations and distance to dewatering wells within 1,000 feet of the contaminant plume with discharge to a sensitive environment
- The presence of preferred routes of migration for liquid or vapor phase contaminants (utility corridors, vertical or angled conduits, faults, fissures, fractures, paleo-channels, etc.)
- Surface water intakes for potable water supplies within ½ mile of the contaminant plume

The human health risk assessment (HHRA) for the groundwater plume was updated in February 2009 and did not find completed pathways for human exposure. The HHRA concluded that exposure to impacted soil or groundwater is unlikely due to the depth to impacted soil and groundwater and restrictions on installation of water wells within the plume. While exposure to soil vapors was identified

as unlikely, the HHRA utilized hypothetical exposures to conservatively evaluate risk. Using petroleum hydrocarbon concentrations from shallow groundwater in 2008 which were significantly higher than 2016 concentrations (e.g., OMW-36 was 1,100 µg/L MTBE in 2008 and was 3.2 µg/L in 2013, prior to being removed from the monitoring program), the HHRA concluded that the “cumulative cancer risks at the Avis / National / Payless commingled plume are acceptable and that the site is ready for closure”¹ (based on human health risks).

Depth to groundwater beneath and in the vicinity of the site is typical for the location within the Las Vegas Valley and ranges from 12 to 18 feet below ground surface. These depths are sufficient to prevent groundwater from surfacing, as the seasonal fluctuation in groundwater elevation is minimal (2 feet or less). No major washes are located in the vicinity of the site. The nearest washes are the Tropicana Wash, approximately 1.2 miles north of the site and the Duck Creek Wash, approximately 2.0 miles southeast of the site, and are not likely to be affected.

Water wells were evaluated as part of the well search process (as previously discussed). According to a well search conducted through the Nevada Division of Water Resources, no dewatering wells have been identified within 1,000 feet of the groundwater plume.

No utility conduits have been identified that could affect offsite MTBE or TBA migration via groundwater. While a formal review with the utility companies was not conducted, it is unlikely that utility installations would be installed within groundwater in the vicinity of the site. Historical evaluations of dissolved petroleum hydrocarbon flow (plume maps, etc.) has not indicated that utility conduits are impacting flow. The site geology includes coarse-grained units interbedded with silty or clayey units. Relatively high groundwater velocities are suspected within these sandy and gravelly units and explain the MTBE and TBA migration to downgradient locations in a short period of time. Investigations of the distal portions of the MTBE and TBA plumes, including discrete-depth groundwater sampling in multiple transects oriented perpendicular to the plume axes have concluded that MTBE and TBA concentrations within these conduits are decreasing over time, and decrease with distance from the source areas.

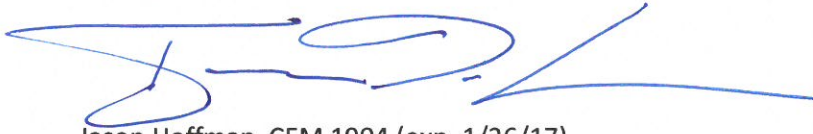
An assessment was performed to evaluate whether surface water intakes for potable water supplies and/or other beneficial uses were located within a ½-mile search boundary of the dissolved petroleum hydrocarbon plume. A review of Drawing 1 did not suggest that surface water intakes for potable water supplies exist within the ½-mile search boundary of the dissolved petroleum hydrocarbon plume. Further investigation, such a site visit, were not conducted, as there are no surface water features (lakes, rivers, etc.) in this part of the Valley.

Conclusions

No completed pathways were identified for human health exposure, or sensitive environments during the well search as being located within 1,000 feet of the dissolved petroleum hydrocarbon plume associated with the three former car rental facilities. No surface water intakes were identified within ½ mile of the dissolved petroleum hydrocarbon plume. If you have any questions or require additional information regarding this Sensitive Receptor Survey, please do not hesitate to contact me.

¹ Collie, Shanna, PhD, Synergy Toxicology. 2009. *Avis / National / Payless Commingled Groundwater Plume, Las Vegas, Nevada*. Prepared for Broadbent & Associates, Inc., Henderson, Nevada.

Sincerely,
BROADBENT & ASSOCIATES, INC.

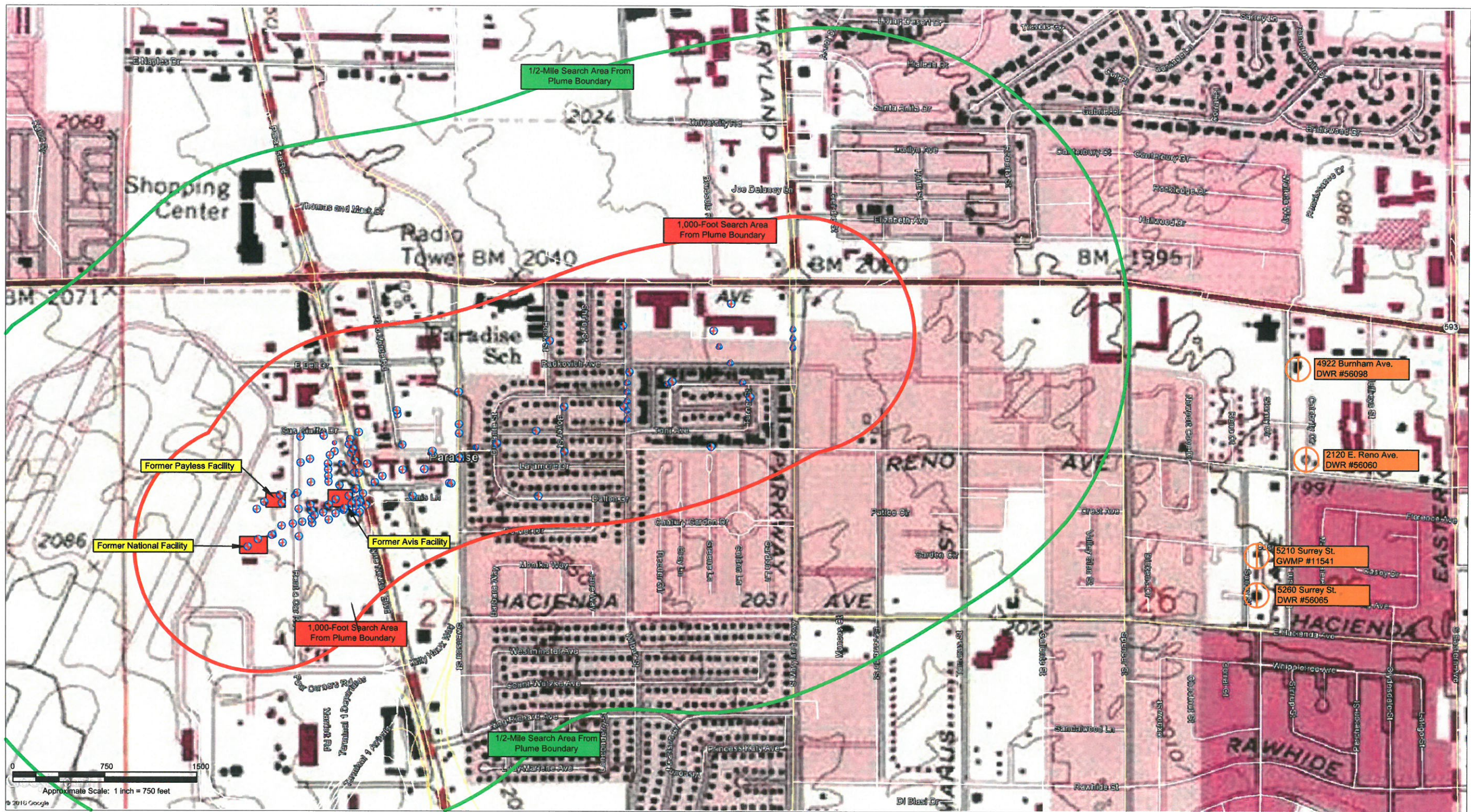


Jason Hoffman, CEM 1904 (exp. 1/26/17)
Senior Geologist

JURAT: I, Jason Hoffman, hereby certify that I am responsible for the services described 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, regulations and ordinances.

cc: Ms. Rose Pelino, 6 Sylvan Way, Parsippany, NJ 07054
Mr. Nick Willden, 1354 Rossini Circle, Henderson, NV 89052
Mr. Rex Heppe, NDEP, Bureau of Corrective Actions, 2030 E. Flamingo Road, Suite 230, Las Vegas, NV 89119-0818
Ms. Chuck Giesler, McCarran International Airport, Environmental Quality, PO Box 11005, Las Vegas, NV 89111-1005
Mr. Bob Schultz, 555 Montgomery Street, Suite 1300, San Francisco, CA 94111-2517
Mr. Keith Houk, Converse Consultants, 3095 East Patrick Lane, Suite 12, Las Vegas, NV 89120
Mr. Andrew Rausch, OGI Environmental LLC, 8820 West Russell Road #140, Las Vegas, NV 89148
ec: Mr. Rex Heppe, NDEP, via ftp.state.nv.us or rheppe@ndep.nv.gov

Drawing 1



LEGEND
 Monitoring Wells Associated with Dissolved Petroleum Hydrocarbon Plume Evaluation



McCarran International Airport
 Las Vegas, Nevada


 BROADBENT &
 ASSOCIATES, INC.


 CONVERSE
 CONSULTANTS


 OGI
 ENVIRONMENTAL, LLC

Drawing 1
 Sensitive Receptor Survey
 Search Boundary

Attachment A

Jason Hoffman

From: Sara Arav Piper [spiper@ndep.nv.gov]
Sent: Tuesday, December 30, 2008 1:31 PM
To: Jason Hoffman
Subject: Active wells: Avis

Jason,

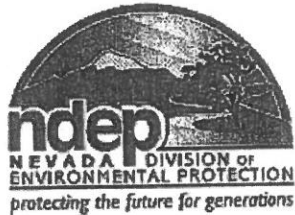
Active wells beyond the MtBE plume are located east of Spencer:

Four nearest:

5260 Surrey St. DWR#56065
5210 Surrey St. No DWR # but GWMP # is 11541
2120 E Reno Ave. DWR # 56060
4922 Burnham Ave. DWR56099 ⓪

Everything west of Spencer and Maryland is destroyed or plugged and abandoned.

Sara



Sara Arav Piper, C.E.M., R.G.
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 E Flamingo Rd., Las Vegas, NV 89119
p: 702-486-2850, Ext. 228,
f: 702-486-2863
spiper@ndep.nv.gov

Die to the past every moment...

2/25/2009

NDEP 00251

Jason Hoffman

From: Jason Hoffman [jhoffman@broadbentinc.com]
Sent: Friday, January 09, 2009 4:50 PM
To: 'Sara Arav Piper'
Cc: 'Jason Reed'
Subject: RE: Avis Well Search

Yes, the others will be useful as well. Thanks for your help.

-J

From: Sara Arav Piper [mailto:spiper@ndep.nv.gov]
Sent: Friday, January 09, 2009 4:46 PM
To: Jason Hoffman
Cc: Jason Reed
Subject: RE: Avis Well Search

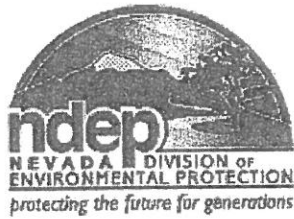
Jason Reed went out with Todd and he knows where this well was located. However, there are a number of other abandoned wells also in the vicinity; do you want the information for those as well?

Sara

Sara Piper, CEM, RG
Bureau of Corrective Actions
NDEP, Las Vegas

Jason Hoffman

From: Sara Arav Piper [spiper@ndep.nv.gov]
Sent: Monday, January 12, 2009 12:14 PM
To: Jason Hoffman
Subject: Wells West of Spencer
Attachments: LVWWDFacilityView wells west of spencer.doc



Sara Arav Piper, CEM., RG
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 E Flamingo Rd., Las Vegas, NV 89119
p: 702-486-2850, Ext. 228,
f: 702-486-2863
spiper@ndep.nv.gov

Die to the past every moment

2/25/2009

NDEP 00253

Well Number	Status	Address
DWR Log: 6657 GWMP_Num 15788	Quasi Municipal Destroyed	APN # 16227101006 No Address Listed
DWR Log: 7518 GWMP_NUM 15789	Quasi Municipal Destroyed	Airport Inn 5125 Swenson St.
DWR Log: 51621 GWMP_NUM 16453	Quasi Municipal Destroyed	5011 Swenson Street
DWR Log: 51539 GWMP_Num: 15786	Quasi Municipal Destroyed	AT&T 775 East Tropicana
DWR Log: 1113 GWMP_NUM: 15787	Quasi Municipal Destroyed	Clark County Aviation 851 East Tropicana
DWR Log: none GWMP_Num: 15794	Domestic Destroyed	1304 East Reno Ave.
DWR Log: none GWMP_Num: 15795	Domestic Destroyed	1334 East Reno Ave.
DWR Log: none GWMP_Num: 16451	Domestic Plugged	5003 Tamarus Street
DWR Log: None GWMP_Num: 16450	Domestic Destroyed	5050 Tamarus Street
DWR Log: None GWMP_Num: 16449	Domestic Destroyed	5050 Tamarus Street
DWR Log: 56081 GWMP_Num: 15793	Domestic Destroyed	5160 Tamarus Street
DWR Log: 7739 GWMP Num 11538	Quasi Municipal Unused	1592 East Hacienda Ave.

Jason Hoffman

From: Rex Heppe <rheppe@ndep.nv.gov>
Sent: Thursday, May 26, 2016 11:41 AM
To: Jason Hoffman
Subject: McCarran RAC Facilities
Attachments: LVVWD Wells.pdf

Jason,

I was able to confirm the data forwarded to you by Sara (see attached). Although there are some wells to the south and southeast, the four identified wells are the only wells to the east and somewhat downgradient of the plume. Let me know if you have any questions.

Thanks

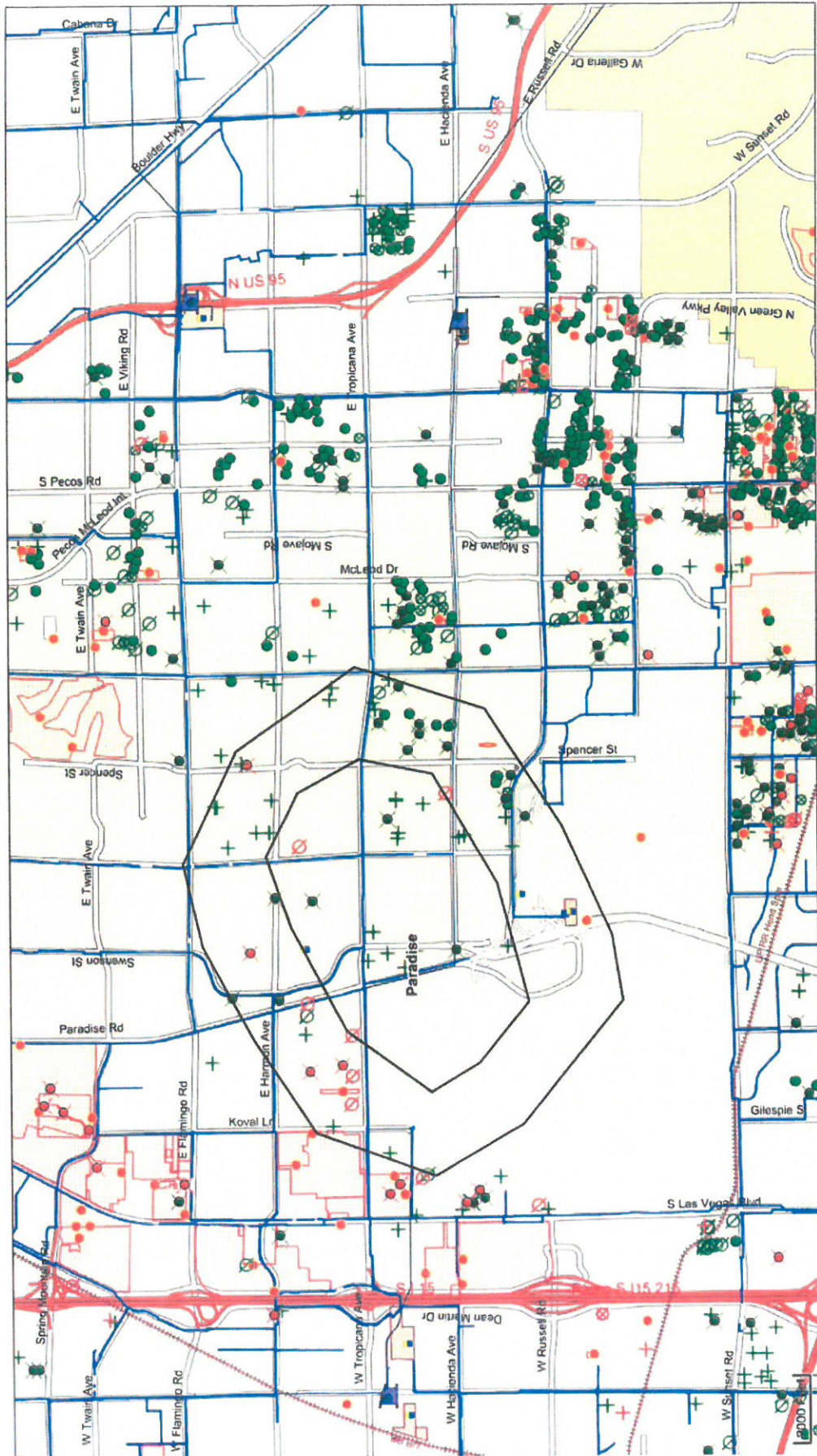
Rex



Rex Heppe, CEM, PG
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 East Flamingo Road, Suite 230
Las Vegas, NV 89119-5163
p: 702.486.2850 ext. 240 f: 702.486.2863
rheppe@ndep.nv.gov
www.ndep.nv.gov

 Please consider the environment before printing this email.

LVAVWD Facility View
McCarran Rental Car Facilities
McCarran International Airport
Las Vegas, NV
Facility ID 8-000006/8-000217/8-000416



Lon - 115.125, Lat: 36.097
FV - 5/26/16 11:11 AM

Attachment B

**WELL LOG AND REPORT TO THE STATE ENGINEER
OF NEVADA**

Log No. 56065
 Rec. 19
 Well No. 1
 Permit No. 117
 Do not fill in

PLEASE COMPLETE THIS FORM IN ITS ENTIRETY

Owner EDWARD K. COCKAN Driller LOUIS F. EVANS
 Address 5260 Surrey Las Vegas, Nevada Address 2012 Carroll N. Las Vegas Lic. No. 117
 Location of well: S. W14 11 11 25 25 Sec. 25, T. 21N/S, R. 61 E, in Clark County
 or Survey 20-20-20-20-20-20
 Water will be used for Domestic Total depth of well 150 ft.
 Size of drilled hole 50' 12" 100' 10" Weight of casing per linear foot 12.15 lbs.
 Thickness of casing 10 ga. Temp. of water _____
 Diameter and length of casing 8 5/8" O.D. 150'
(Casing 12" in diameter and under give inside diameter; casing 12" in diameter give outside diameter.)
 If flowing well give flow in c.f.s. or g.p.m. and pressure _____
 If nonflowing well give depth of standing water from surface 16 ft.
 If flowing well describe control works _____
(Type and size of valve, etc.)
 Date of commencement of well August 11, 1965 Date of completion of well August 16, 1965
 Type of well rig Keystone Cable tool

LOG OF FORMATIONS

From feet	To feet	Thickness feet	Type of material
0	3	3	sandy soil
3	15	12	caliche
15	18	3	broken caliche & gravel
18	25	7	red clay
25	45	20	red clay (water)
45	65	20	broken caliche (water)
65	95	30	sandy clay
95	130	35	sandy clay & gravel (water)
130	145	15	sandy clay
145	150	5	clay & gravel (water)

Water-bearing Formation, Casing Perforations, etc.

Chief aquifer (water-bearing formation)
 from 95 to 130 ft.

Other aquifers 25 to 45
145 to 150

First water at 25 feet.

Casing perforated
 from 70 to 150 ft.

Size of perforations
1/2" wide 6" long

(OVER)

LOG OF FORMATIONS—Continued

From feet	To feet	Thickness	Type of material

CASING RECORD

Diam. casing	From feet	To feet	Length	REMARKS—Seals, Grouting, etc.
8 5/8"	0	150	150	gravel packed 100 ft. from 50 ft. to 150 ft. 1 1/2 yds. gravel cemented 50 ft. from 0 to 50 ft. 1 1/2 yds. cement

GENERAL INFORMATION—Pumping Test, Quality of Water, etc.

WELL DRILLER'S STATEMENT

This well was drilled under my jurisdiction and the above information is true to my best information and belief.

Signed Louis F. Evans
Well Driller

By LOUIS F. EVANS

License No. 117

Dated Sept. 8, 1965

(Not to be filled in by Driller)

RECEIVED
SEP 10 1965

WATER RESOURCES
SEARCH OFFICE
LAS VEGAS, NEVADA

**WELL LOG AND REPORT TO THE STATE ENGINEER
OF NEVADA**

PLEASE COMPLETE THIS FORM IN ITS ENTIRETY

Log No. 56098
 Rec. 19
 Well No. _____
 Permit No. _____
 Do not fill in.

Owner John L. & Jacqueline Longest Driller Effinger Drilling & Pump Service

Address 4922 South Burnham Address Box 579 City _____ Lic. No. 212

Location of well: N 1/4 Sec 26, T. 21 N/S, R. 1 E, in Clark County
 or Tropicana & Burnham 4922 South Burnham

Water will be used for Domestic Total depth of well 250 feet

Size of drilled hole 8 inch Weight of casing per linear foot _____

Thickness of casing 10 Gauge Temp. of water _____

Diameter and length of casing 6" ID 100 feet liner
(Casing 12" in diameter and under give inside diameter; casing 12" in diameter give outside diameter.)

If flowing well give flow in c.f.s. or g.p.m. and pressure _____

If nonflowing well give depth of standing water from surface _____

If flowing well describe control works _____
(Type and size of valve, etc.)

Date of commencement of well February 25, 1965 Date of completion of well February 27, 1965

Type of well rig "Walker-Neer 31"

LOG OF FORMATIONS

From feet	To feet	Thickness feet	Type of material
			Original well drilled by Effinger April 12, 1956
160	202	42	Red sticky Clay
202	210	8	Gravel (water)
210	230	20	Red Sand & Clay
230	235	5	Sand & Gravel (water)
235	242	7	Red Clay
242	250	8	Gravel (water)

Water-bearing Formation, Casing Perforations, etc.

Chief aquifer (water-bearing formation)
 from 242 to 250 ft.

Other aquifers 230-235
202-210

First water at _____ feet.

Casing perforated
 from 165 to 245 ft.

Size of perforations
1/8" x 12" Torch

(OVER)

LOG OF FORMATIONS—Continued

From feet	To feet	Thickness	Type of material

CASING RECORD

Diam. casing	From feet	To feet	Length	REMARKS—Seals, Grouting, etc.
6" ID	150	250	100	Perforated liner in eight inch well.

GENERAL INFORMATION—Pumping Test, Quality of Water, etc.

WELL DRILLER'S STATEMENT

This well was drilled under my jurisdiction and the above information is true to my best information and belief.

Signed Hoffinger Drilling & Pump
Well Driller

By [Signature]
License No. 272

Dated March 1, 19 65

(Not to be filled in by Driller)

RECEIVED

MAR 4 1965

DIV. OF WATER RESOURCES
BRANCH OFFICE
LAS VEGAS, NEVADA

WELL LOG AND REPORT TO THE STATE ENGINEER OF NEVADA

Log No. 5606
 Rec. 19
 Well No. 1
 Permit No. _____
Do not fill in

Owner Mr. Geo. L. Boyle Driller Douglas Slagle
 Address 656 California Street Boulder Address PO Box 2081 Las Vegas Lic. No. 137
 Location of well: NE $\frac{1}{4}$ NE $\frac{1}{4}$ Sec. 26, T. 21 N/S, R. 61 E, in Clark County
 or Just off Bond Rd. South-west of the Bar W Ranch
 Water will be used for Domestic Total depth of well 204 Feet
 Size of drilled hole 8 Inch Weight of casing per linear foot 9.91 lbs
 Thickness of casing 12 Gage Temp. of water Cool
 Diameter and length of casing 8 3/16 Inches -- 49 Ft. 5 In. Used in Well
 (Casing 12" in diameter and under give inside diameter; casing 12" in diameter give outside diameter.)
 If flowing well give flow in c.f.s. or g.p.m. and pressure _____
 If nonflowing well give depth of standing water from surface 11 Ft. 3 Inches
 If flowing well describe control works _____
 (Type and size of valve, etc.) _____
 Date of commencement of well Oct 18th. 1953 Date of completion of well Oct. 23rd. 1953
 Type of well rig Keystone # 50 (53)

LOG OF FORMATIONS

From feet	To feet	Thickness feet	Type of material	Water-bearing Formation, Casing Perforations, Etc.
0	$\frac{1}{2}$	$\frac{1}{2}$	Blow Sand	
$\frac{1}{2}$	25	24 $\frac{1}{2}$	Gypsum Rock	
25	26	1 $\frac{1}{2}$	Cream Colored Clay	
26	29	3	Rock	
29	31 $\frac{1}{2}$	1 $\frac{1}{2}$	Gravel, Sand, Water, Pebbles (Surface Water)	Chief aquifer (water-bearing formation) from <u>129</u> to <u>136</u> ft.
31 $\frac{1}{2}$	49	17 $\frac{1}{2}$	Red Clay an Fine Red Sand	Other aquifers <u>29</u> to <u>31$\frac{1}{2}$</u>
49	49 $\frac{1}{2}$	$\frac{1}{2}$	Solid Rock	<u>55</u> to <u>71</u>
(Casing 12" in diameter and under give inside diameter; casing 12" in diameter give outside diameter.)				<u>(194 to 201-Questionable)</u>
49 $\frac{1}{2}$	55	5 $\frac{1}{2}$	Solid Rock	
55	71	16	Series of Gravel, Water, Sand, light Brn Clay (2nd. Water)	
71	96	25	Red Clay an Pebbles	First water at <u>29</u> to <u>31$\frac{1}{2}$</u> feet.
96	123	27	Light Brn Clay an Sand	
123	129	6	Solid Rock	
129	136	7	Gravel, Sand, silt, Water (3rd Water)	
136	150	14	Red Clay	Casing perforated from _____ to _____ ft.
150	158	8	Rock (Sand Stone)	
158	176	18	Cream colored Clay an Sand	
176	191	15	Red Clay an Pebbles	
191	194	3	Solid Rock	Size of perforations _____
194	201	7	Series of Rock, Sand, Water (Believe the 4th Water, but can't be sure)	
201	204	3	Red Clay	

LOG OF FORMATIONS—Continued

From feet	To feet	Thickness	Type of material

CASING RECORD

Diam. casing	From feet	To feet	Length	"Remarks"—Seals, Grouting, Etc.
8 5/8 O.D.	0	59'5"	59'5"	Casing Cemented the Full Length, using a Six(6) sack mixture of Cement an Sand(No Rocks) Stubbed out the last 6 Ft. of Casing with Standard 8" Casing in event the well Flowed

GENERAL INFORMATION—Pumping Test, Quality of Water, Etc.

Pulled 400 Gal. from well in 10 minutes an well recovered in 14 Minutes

WELL DRILLERS STATEMENT

This well was drilled under my jurisdiction and the above information is true to my best information and belief.

Signed Douglas Slagle
Well Driller

By Douglas Slagle
License No. 137

Dated Oct. 24, 1953

(Not to be filled in by Driller)

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