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ENVIRONMENTAL PROTECTION

BULLEN LAW, LLC
8635 W. Sahara Ave. #454
Las Vegas, NV 89117

Linda M. Bullen
702-279-4040
linda@bullenlaw.com

Via Electronic Mail

October 24, 2018

Ms. Val King
Executive Secretary
State Environmental Commission
Department of Conservation & Natural Resources
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701

Re: Appeal of Avis Budget Car Rental, LLC of October 15, 2018 Denial by the Nevada Division of Environmental Protection of Request to Conduct Additional Remedial Activities

Dear Ms. King:

Enclosed please find the appeal to the State Environmental Commission by Avis Budget Car Rental, LLC (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. By this letter, ABCR hereby waives its right to a hearing of this matter within twenty days of this appeal.

If you have any questions regarding this filing, please do not hesitate to contact me at (702) 279-4040.

Best Regards,



Linda M. Bullen
Attorney for Avis Budget Car Rental, LLC

cc: Frederick Perdomo (via email)
Jeff Collins (via email)
Todd Croft (via email)
Ben Moan (via email)
Rose Pelino (via email)
Robert Schultz (via email)
Kirk Stowers (via email)
Jason Hoffman (via email)



State of Nevada

Dept. of Conservation & Natural Resources

State Environmental Commission SEC.nv.gov
901 South Stewart Street, Suite 4001, Carson City, Nevada 89701

FORM 3: FORM FOR REQUESTING AN APPEAL HEARING
(Provide attachments as needed)

1. Name, address, telephone number, and signature of appellant:

Name: Avis Budget Car Rental, LLC by Linda M. Bullen (Legal Counsel)

Physical Address: 8635 W. Sahara Ave. #454, Las Vegas, NV 89117

E-mail Address: linda@bullenlaw.com

Telephone Number: 702-279-4040

Signature: Linda M. Bullen

Representative capacity (if applicable): Legal Counsel

2. Attach copy of Nevada Division of Environmental Protection final decision, such as permit or notice of alleged violation, being appealed.

3. Specify grounds of appeal: (check all that apply)

- Final decision in violation of constitutional or statutory provision;
- Final decision made upon unlawful procedure;
- Final decision was affected by other error of law;
- Final decision was clearly erroneous in view of the reliable, probative and substantial evidence on the whole record;
- Final decision was arbitrary or capricious or characterized by abuse of discretion;

4. For each ground of appeal checked above, please list the constitutional, Nevada Revised Statute (NRS), and/or Nevada Administrative Code (NAC) provision allegedly violated. Also list the statutes and/or or regulations that give the State Environmental Commission jurisdiction to hear the appeal.

NRS 445A.605; NRS 233B.050, NAC 445A.890.2; NAC 445A.22725.2; NAC 445A.22735(1)(d) (2); NAC 445A.22735(4); NAC 445B.890.2(e) and NAC 445B.890.2(f)

5. For each ground of appeal checked above, provide a brief and concise statement of the facts which provide the basis for the appeal.

See Attachment 1 hereto.

Date of Request: October 24, 2018.

Send Form to: Executive Secretary, State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, NV 89701

ATTACHMENT 1 (Question #5)

For each ground of appeal checked above, provide a brief and concise statement of the facts which provide the basis for the appeal.

Introduction

Pursuant to NRS 445A.605, NRS 233B.050 and NAC 445A.890.2, Avis Budget Car Rental, LLC (ABCR) hereby brings this appeal of the decision contained in the October 15, 2018 letter to ABCR (Exhibit A hereto) by the Nevada Division of Environmental Protection (NDEP) rejecting the *Addendum to the Offsite Corrective Action Plan for the Commingled MTBE Plume* (the CAP Addendum), dated 27 September 2018, and prepared by Broadbent & Associates, Inc (Broadbent).

Legal Authority

ABCR brings this appeal pursuant to NAC 445B.890.2 (e) and (f), and asserts that the decision of NDEP to deny ABCR's request to conduct remedial activities in the commingled MTBE plume was a final agency action that was:

- (1) clearly erroneous in view of the reliable, probative and substantial evidence on the whole record (NAC 445B.890.2 (e)); and
- (2) arbitrary or capricious or characterized by an abuse of discretion (NAC 445B.890.2 (f)).

Factual Basis for Appeal

ABCR has been identified as a 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 Broadbent is ABCR's Certified Environmental Manager (CEM) for the response activities associated with the remedial activities associated with this site. The CAP Addendum proposes to supplement the *Off-site Corrective Action Plan*, prepared by Broadbent and URS Corporation, dated October 5, 2000, which was subsequently approved by the NDEP in a letter dated September 21, 2001, and proposes groundwater remediation activities to reduce methyl tertiary-butyl ether (MTBE) concentrations in offsite groundwater.

In addition, ABCR asserts as follows as the basis for its appeal:

- NDEP has identified releases at the Avis facility as a source of the offsite MTBE contamination.
- As of the Second Quarter 2018, groundwater beneath an approximately 3.5-acre area is contaminated by MTBE (*McCarran Data Package 2Q2018*, CE2 Corporation, August 23, 2018). The affected area is located east of McCarran International Airport, between

Paradise Road and Maryland Parkway in Las Vegas, Nevada. The property overlying the contaminated groundwater is generally developed for residential use, including single family homes and apartment complexes.

- MTBE contamination in groundwater in the subject area was discovered in 1998. A network of 35 groundwater wells are routinely monitored in the vicinity of the 3.5-acre MTBE groundwater plume. The highest detected concentrations of MTBE in the Offsite Plume during Fourth Quarter 2017 in this portion of the MTBE plume were approximately 1700 µg/L (CAP Addendum, Sec. 2.0), and to date, active remediation in this portion of the plume has not been attempted.
- The MTBE plume in groundwater appears stable. If active remediation is not performed and the MTBE concentrations are left unabated, MTBE concentrations higher than the MTBE action level of 200 ug/L are expected to persist for 10 to 20 years into the future (*EPA BIOSCREEN Model (Draft)*, Broadbent, February 2018). A study conducted to evaluate biodegradation concludes that the future rate of biodegradation is uncertain, that significant aerobic biodegradation is not likely occurring, and the rates of biodegradation could be increased by increasing dissolved oxygen and nutrients within the offsite MTBE plume (*Evaluation of Supplemental Groundwater Bioparameter Data*, Broadbent, October 1, 2018).
- NDEP has assigned a site-specific action level of 200 µg/L MTBE in groundwater and routinely refers to Avis' assigned site-specific action level in NDEP correspondence. Most recently, the NDEP compared MTBE concentrations in groundwater related to the Avis facility site-specific action level in its March 31, 2017 letter to ABCR.
- In addition to assigning 200 ug/L MTBE as the site-specific action level, the NDEP uses 200 ug/L in groundwater as a state-wide general action level for MTBE. NDEP established the state-wide MTBE action level in the *MTBE Oxygenated Fuel Corrective Action Guidance* dated October 1998 (the "Guidance").
- NDEP identifies interim action levels of 20 ug/L MTBE where receptors are in close proximity, and 200 ug/L for sites with incomplete exposure pathways. In asserting these action levels for groundwater remediation, the NDEP 1998 MTBE Guidance states: "these values are reinforced through use of NAC 445A.22735(1)(d)(2) and 445A.22735(4)."
- The Guidance identifies 200 ug/L MTBE as an appropriate groundwater remediation action level, "for sites with incomplete exposure pathways" and 20 ug/L as the appropriate groundwater remedial action level for sites in close proximity to receptors and/or sensitive environments.
- The Guidance further states that "corrective action measures should be implemented on MTBE-impacted groundwater as soon as possible after release confirmation."

- ABCR's CAP Addendum proposes enhanced biodegradation to reduce MTBE concentrations in groundwater. Proposed cleanup activities include the installation of 15 remediation wells and oxygenation of groundwater and addition of nutrients. The CAP Addendum proposes to evaluate groundwater conditions monthly, and collect groundwater samples quarterly, to evaluate the effectiveness of the cleanup activities, and allow for adjustments in the application volume of dissolved oxygen and nutrient levels. The forecast cost of the remediation and monitoring activities is approximately \$150,000. (See Exhibit B hereto.) The CAP Addendum anticipates one year of active remediation, followed by verification monitoring.
- The cost of groundwater monitoring is currently more than \$50,000 per year. The cost to monitor groundwater for the projected 10 to 20 years until sufficient natural attenuation has occurred for the NDEP to close the case will exceed the estimated cost for remediation more than 5-fold. *Id.* ABCR's CAP Addendum proposes a more cost-effective alternative for remediation of the offsite than monitored natural attenuation.
- In its October 15, 2018, rejection letter, the NDEP states that it "believes that no remediation of the down-gradient area is necessary at this time." This statement contradicts the Guidance, which has been used state-wide for twenty years, that states that remediation should be conducted as soon as possible following confirmation of a release.
- Also in its October 15, 2018 rejection letter, the NDEP states: "the Site is a good candidate for evaluating a groundwater exemption closure."
- ABCR has not requested a groundwater exemption closure and has no intent to request an exemption in the future. ABCR has repeatedly expressed its desire to seek a "clean", not exemption-based closure, to NDEP, and pursuant to NAC 445A.22725.2, the decision whether to request an exemption-base closure is that of the owner or operator. See NAC 445A.22725.2 "*An owner or operator may, before initiating corrective action or after the termination of remediation pursuant to NAC 445A.22745, submit a written request to the Director for an exemption from the provisions of subsection 1*".
- By rejecting the CAP Addendum, NDEP is denying ABCR access to corrective action funds currently available from the Petroleum Fund for groundwater remediation at this site which would move ABCR toward clean closure. After the most recent Petroleum Fund Board-approved reimbursement (September 6, 2018), ABCR has \$2,182,757.32 remaining in available corrective action funds from the Petroleum Fund, more than sufficient funds to conduct the requested remedial activities.

Conclusion

In its CAP Addendum, ABCR proposed active remediation of groundwater in the offsite plume to reduce MTBE concentrations. Enhanced biodegradation is a cost-effective alternative to reduce MTBE concentrations in groundwater at the site. Denial of ABCR's request for approval

of the CAP Addendum and the corresponding access to project funding from the Petroleum Fund is an abuse of agency discretion and was clearly erroneous in view of the reliable, probative and substantial evidence on the whole record. On this basis, ABCR respectfully requests that NDEP's decision to deny the relief requested in the CAP Addendum be reversed.

Exhibit A



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
Petroleum Fund ID: 2008000005
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 bmoran@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
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

Ms. Rose Pelino, Avis Budget Group, Inc.
Avis Rent a Car Facility; Facility ID:8-000217
Petroleum Fund ID: 2008000005
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
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
Frederick Perdomo, State of Nevada, Office of the Attorney General, 100 North Carson Street, Carson City, Nevada 89701 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
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
Herb Sequera, Interim Director of Environmental Health, Southern Nevada Health District, 280 South Decatur Boulevard, Las Vegas, NV 89107 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
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
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
Linda Bullen, Bullen Law LLC, 8635 West Sahara Avenue, Suite 454, Las Vegas, NV 89117-5858 linda@bullenlaw.com
Jason Hoffman, CEM, Broadbent & Associates, Inc., 8 West Pacific Avenue, Henderson, NV 89015-7383 jhoffman@broadbentinc.com
Kirk Stowers, Broadbent & Associates, Inc., 8 West Pacific Avenue, Henderson, NV 89015-7383 kstowers@broadbentinc.com
Robert Schultz, Geo Blue Consulting, 78 Throckmorton Avenue, Suite 3, Mill Valley, CA 94941-1918 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
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
John Witucki, Clark County Department of Aviation, McCarran International Airport, 5757 Wayne Newton Boulevard., P.O. Box 11005, Las Vegas, NV 89119-1005 johnwi@mccarran.com
Keith Houk, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 khouk@converseconsultants.com
Kurt Goebel, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 kgoebel@converseconsultants.com
Robert Gegenheimer, Converse Consultants, 6610 West Arby Avenue, Suite 104, Las Vegas, NV 89118 rgegenheimer@converseconsultants.com
Nick Willden, Willden Automotive Group, 1354 Rossini Circle, Henderson, NV 89052 willdens@cox.net
James Puzey, Holley-Driggs-Walch-Fine-Wray-Puzey-Thompson, 800 South Meadows Parkway, Suite 800, Reno, NV 89521 jpuzey@nevadafirm.com

cc: Clark County Emergency Management, 500 South Grand Central Parkway, 6th 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

File Copy (8-000006, 8-000217, 8-000416)

Exhibit B

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.