

Addison Airport - Fuel Spills Plan  
2001

5

## PHASE I ENVIRONMENTAL ASSESSMENT UPDATE RECOMMENDATIONS AND RESPONSES

According to page 6 of the Phase I Environmental Assessment Update prepared by Camp Dresser & McKee dated August 29, 2001, *"Based on TNRCC records which document a Compliance Evaluation Inspection (CEI) of each of the seven fuel farms on April 21, 1998, all USTs [Underground Storage Tanks] at the fuel farm are now in compliance."*

The report also references four leaking petroleum storage tank (LPST) sites at the airport's fuel farm. It is important to note that a LPST site is defined as "A site at which a confirmed release of a petroleum substance from an UST or AST has occurred. Petroleum substance contamination which results from multiple sources may be deemed as one LPST site by the agency."<sup>i</sup> Any significant, uncontrolled release of fuel from a tank is considered a LPST. The cases referenced by the Phase 1 are not actually leaking tanks, but rather the result of overfills or spills. No evidence of problems with the individual tanks has been presented or found.

Following is a list of the recommendations contained in Section 7.2.1. In **bold** after each recommendation is the necessary action that has been or should be taken:

- *Registration Inconsistencies*

CDM recommends amended tank registration forms be submitted by Addison Airport (Multi-User Fuel Farm), Cherry Air, Million Air, Mercury Air, and Addison Express to accurately reflect the status, contents, and/or capacity of their respective tanks. The Town should monitor this activity to ensure that it is completed correctly. ***Five tanks being used by Addison Express are registered to both Addison Express and R Stern FBO Fuel Farm, three tanks being leased from the town by Mercury Air Center are registered to both the lessee and the lessor, and one tank is registered to Monarch although they do not have a tank. This recommendation can be easily followed by updating paperwork at the Airport Operator's / Town's convenience.***

- *Regulatory Issues*

- o Based on the absence of TNRCC notification documentation for the releases at the Addison Express fuel farm, further investigation should be performed to verify the releases were reported as required. ***According to information and documentation pending from by General Manager Ed Morales these releases have been reported as required.***<sup>iii</sup>
- o The removable gates on the spill pads located adjacent to the Multi-User Fuel Farm and Million Air fuel farm should be replaced as

soon as possible to prevent future spills on the pad from coming in contact with adjacent soil. **The gates are outside the individual fuel farm fences and therefore the Airport Operator's / Town's responsibility. They should be simple and inexpensive to replace.**

- Texas Pro Air Fuel Farm – if not already done, plug and abandon the associated monitoring well and submit a Final Site Closure Report. **In a letter from EA Engineering dated April 17, 2001 to David Pearce<sup>iv</sup>, the Airport Operator was notified of the need to plug and abandon these wells. This farm is the responsibility of the Airport Operator / Town. According to the TNRCC database, this case is still open.<sup>v</sup>**
- Million Air Fuel Farm – obtain a letter from the TNRCC approving Million Air not to plug and abandon the monitoring wells installed as part of their release investigation. **Million Air has requested these remain open and has not yet received approval. This is a matter of paperwork and should be easily resolved. According to the TNRCC database this case has been closed.<sup>vi</sup>**
- Jet Way Fuel Farm (formerly R. Stern Fuel Farm) – determine the reason TNRCC issued a letter approving closure of the LRST case and then subsequently issued another letter stating further corrective action may be necessary. If further corrective action is necessary, the additional activities should be completed and reported. **The last correspondence received by R Stern documents the closure of this case.<sup>vii</sup> According to the TNRCC database, this case has been closed.<sup>viii</sup>**
- AATI Fuel Farm (Multi-User Fuel Farm) – if not already performed, the activities requested in the TNRCC's CARF dated April 6, 1999 should be completed and reported, and a Release Report Form should be submitted to document the removal of the two 1,000-gallon tanks. **This is a paperwork issue and the responsibility of the Airport Operator / Town of Addison.**
- Cherry Air Fuel Farm (Addison Aircraft Storage Fuel Farm) – if not already performed, a risk-based assessment should be completed and reported to the TNRCC in an Assessment Report Form. **According to the TNRCC database, this LPST case has been closed.<sup>ix</sup> The site assessment has been completed and forwarded to TNRCC.<sup>x</sup>**

- **Release Investigation**

Information obtained from Addison Express indicates that no sampling has or will be performed in response to releases at their fuel farm. CDM recommends these releases, as well as any others occurring in the future, should be characterized through a combination of surface, subsurface and/or groundwater sampling and testing to establish baseline soil and groundwater conditions. **According to information and documentation**

LOCATE  
WELL

CHECK JERRY

DONE?

SPILL  
CHECK JERRY

**supplied by General Manager Ed Morales sampling has been accomplished in accordance with TNRCC guidelines.<sup>xi</sup>**

Also at issue regarding the Fuel Farm is the question of insurability. All of the current fuel farm operators have liability insurance at this time.<sup>xii</sup> The fuel farm operators' insurance is the primary coverage in the event of a covered event. Any difficulty obtaining insurance coverage is unique to the Airport Operator / Town of Addison.

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<sup>i</sup> (Texas Administrative Code, Title 30 Environmental Quality, Part I Texas NATURAL RESOURCE CONSERVATION COMMISSION, Chapter 334 UNDERGROUND AND ABOVEGROUND STORAGE TANKS, Subchapter A GENERAL PROVISIONS, RULE §334.2 Definitions)

<sup>ii</sup> See Exhibit A: Notices of Storage Tank Registration

<sup>iii</sup> See Exhibit B: Documentation from Garner Environmental and Cactus Environmental

<sup>iv</sup> See Exhibit C: Letter from EA Engineering

<sup>v</sup> See Exhibit D: TNRCC Database Query Results for LPST ID # 91471

<sup>vi</sup> See Exhibit E: TNRCC Database Query Results for LPST ID # 98890

<sup>vii</sup> See Exhibit F: Letter from TNRCC to Ray Stern

<sup>viii</sup> See Exhibit G: TNRCC Database Query Results for LPST ID # 110033

<sup>ix</sup> See Exhibit H: TNRCC Database Query Results for LPST ID # 112934

<sup>x</sup> See Exhibit I: Site Assessment Executive Summary for LPST ID # 112934

<sup>xi</sup> See Exhibit B: Documentation from Garner Environmental and Cactus Environmental

<sup>xii</sup> See Exhibit J: Insurance Documents from Fuel Farm Operators

November 8, 2001

Town of Addison  
5300 Belt Line Road  
Addison, TX 75001

Dear Addison Council Members,

As the current fuel farm operators at Addison Airport, we would appreciate the opportunity to bring forth information to your attention concerning the existing condition of the current fuel farms. Enclosed are the recommendations from the phase I environmental assessment prepared by Camp, Dressor & McKee concerning the environmental compliance of the fuel farms. Responses to those recommendations with back-up information in the Exhibit A are included as well.

I am confident after reviewing this information we will come to a mutual agreement there is not a contamination issue with the current fuel farms. Nor are there any operational or safety issues at the current fuel farms. Therefore it should not be necessary to spend millions of dollars to relocate the farm at the fuel farm operator's or the Town of Addison's expense. We appreciate the opportunity to work with you and the airport management on resolving this issue.

Sincerely,

Jack Hopkins  
General Manger  
Million Air Dallas

Ray Stern  
Partner  
R. Stern FBO, LP

Kenneth Donaldson  
President  
Cherry Air

Vincent Hilgeman  
General Manager  
Mercury Air Center

Edward Morales  
General Manager  
Addison Express

## PHASE I ENVIRONMENTAL ASSESSMENT UPDATE RECOMMENDATIONS AND RESPONSES

According to page 6 of the Phase I Environmental Assessment Update prepared by Camp Dresser & McKee dated August 29, 2001, "*Based on TNRCC records which document a Compliance Evaluation Inspection (CEI) of each of the seven fuel farms on April 21, 1998, all USTs [Underground Storage Tanks] at the fuel farm are now in compliance.*"

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Exhibit A  
Notices of Storage Tank Registration



*Texas Natural Resource  
Conservation Commission*  
**Notice of Storage Tank Registration**  
(Non-Transferable)

Date of Issuance  
15-APR-1999

This hereby certifies that the storage tanks owned and located as indicated below are duly registered with the Texas Natural Resource Conservation Commission. For petroleum product tanks, this certificate allows owners or operators of the storage tanks indicated below to participate in the Petroleum Storage Tank Remediation Fund pursuant to Section 26.346 of the Texas Water Code, if such owner or operator fulfills all applicable TNRCC requirements related to eligibility. (See back for owners and operators responsibilities.)

Keith Partners II  
4500 Claire Chennault  
Addison TX 75001

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C  
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Y

OWNER ID NUMBER 51724  
FACILITY NUMBER 0070593

E U A AIR SUPPORT, INC  
15407 Addison Rd  
ADDISON TX 75001

NUMBER OF USTs [006]  
NUMBER OF ASTs [000]



*Texas Natural Resource  
Conservation Commission*  
**Notice of Storage Tank Registration**  
 (Non-Transferable)

Date of Issuance  
13-JUN-2000

This hereby certifies that the storage tanks owned and located as indicated below are duly registered with the Texas Natural Resource Conservation Commission. For petroleum product tanks, this certificate allows owners or operators of the storage tanks indicated below to participate in the Petroleum Storage Tank Remediation Fund pursuant to Section 26.346 of the Texas Water Code, if such owner or operator fulfills all applicable TNFCC requirements related to eligibility. (See back for owners and operators responsibilities.)

ADDISON AIRCRAFT STORAGE  
 4584 CLAIRE CHENNAULT  
 DALLAS TX 75248

F  
A  
C  
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L  
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T  
Y

OWNER ID NUMBER 26620  
 FACILITY NUMBER 0050235

ADDISON AIRCRAFT STORAGE  
 4584 CLAIRE CHENNAULT  
 ADDISON TX 75001

NUMBER OF USTs   
 NUMBER OF ASTs



Texas Natural Resource Conservation Commission

Date of Issuance: JAN-2001

Notice of Storage Tank Registration

(Non-Transferable)

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RR INVESTMENTS, INC
4300 WESTGROVE
Addison TX 75001

OWNER ID NUMBER: 01835
FACILITY NUMBER: 0003036
MILLION AIR DALLAS
4300 Westgrove
ADDISON TX 75001

NUMBER OF USTs: 005
NUMBER OF ASTs: 000

06-300 (Rev. 9-82/7)

TEXAS

AVIATION FUEL DEALER

This permit is based on your compliance with the Texas Motor Fuels Tax. This permit may be revoked for any violation of the law or Comptroller's orders. You may not engage in further business if this permit is revoked.

Legal cite: TEX. TAX CODE ANN. ch. 153.

PERMIT IS NON-TRANSFERABLE

PLEASE READ REVERSE SIDE

Taxpayer name and mailing address

RR INVESTMENTS INC
4300 WESTGROVE DR
ADDISON TX 75001

Table with 2 columns: Field Name, Value. Taxpayer number: 1-75-1768946-3. Effective date: 07-01-83. Expiration date: XX-XX-XX.

Signature of John Sharp, Comptroller of Public Accounts

Texas Natural Resource Conservation Commission Petroleum Storage Tank Program

Expires Last Day of: May 2002
TNRCC Form LPS PST05 (10-30-2000)

Delivery Certificate

(Non-Transferable)

This hereby certifies that the underground storage tanks (USTs) at the facility identified herein have been self-certified as compliant with all technical and administrative standards for fuel delivery purposes. This certificate verifies self certification only, and does not certify that the listed USTs are in compliance with TNRCC's Technical and Administrative requirements.

Owner/Operator #: 103832

Facility #: 0003036

MILLION AIR
4300 WESTGROVE
ADDISON, TX 75001

Million Air Dallas
4300 Westgrove
ADDISON, TX 75001

Self-Certified UST's 1,2,3,4,5



*Texas Natural Resource  
Conservation Commission*  
Notice of Storage Tank Registration

Date of Issuance  
16-DEC-1996

(Non-Transferable)

This hereby certifies that the storage tanks owned and located as indicated below are duly registered with the Texas Natural Resource Conservation Commission. For petroleum product tanks, this certificate allows owners or operators of the storage tanks indicated below to participate in the Petroleum Storage Tank Remediation Fund pursuant to Section 26.346 of the Texas Water Code, if such owner or operator fulfills all applicable TNRCC requirements related to eligibility. (See back for owners and operators responsibilities.)

R. Stern F.B.O. Limited Partnership  
4553 Keller Springs Rd  
Dallas TX 75248

F  
A  
C  
I  
L  
I  
T  
Y

OWNER ID NUMBER 49404  
FACILITY NUMBER 0044612

R STERN F.B.O. FUEL FARM  
15411 Addison Rd  
ADDISON TX 75001

NUMBER OF USTs 004  
NUMBER OF ASTs 000

Prepared by:  
Cactus Environmental Service  
4960 Singleton Blvd.  
Dallas, Texas 75212  
214-252-5009 (Office)  
214-252-5060 (Fax)

Incident Date: May 5, 2000  
Report Date: May 16, 2000

Addison Express  
15400 Addison Rd.  
Addison, Texas



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Shannon O'Glee  
Sr. Product Manager

A

B

C

Exhibit B  
Documentation from Garner Environmental and Cactus  
Environmental

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- 2.0 Incident Summary
- 3.0 Site Location
- 4.0 Product Identification
- 5.0 Emergency Response Actions
- 6.0 Remediation Actions
- 7.0 Summary

## APPENDIXES

- Appendix A: Site Map
- Appendix B: Site Photos
- Appendix C: Disposal Manifest



## **1.0 Introduction**

Cactus Environmental Service (Cactus) is pleased to present the following Emergency Response Report. The following report is being submitted to Addison Express to document actions taken by Cactus Environmental following the fuel spill that occurred on May 5, 2000, at Addison Airport.

## **2.0 Incident Summary**

On May 5, 2000, an underground storage tank was overfilled releasing an undetermined amount of Jet-A fuel. The fuel was released on the asphalt, concrete and grass area directly in front of the fuel farm. The product also entered a culvert inlet allowing the product to flow to the west and enter a drainage ditch. The release was contained in the drainage ditch west of the culvert opening. A containment ditch was dug and boomed to contain the remaining product. Addison Fire Department was on scene upon arrival of Cactus emergency response crews.

## **3.0 Site Location**

The spill occurred at the large fuel farm across from Hanger 19. The product affected the concrete, asphalt and soil west of the fuel farm. The product entered a drain inlet, which spilled the product into a culvert ditch southwest of Building P-4. A large area of asphalt directly in front of the fueling area was removed due to contamination. A containment area was established west of the drain culvert.

## **4.0 Product Identification**

The product was immediately identified as Jet-A. (No Material Safety Data Sheet available.)

## **5.0 Emergency Response Actions**

On May 5, 2000 Cactus Environmental Service responded to a fuel spill at Addison Express, 15400 Addison Road. An undetermined amount of Aviation Jet-A fuel had been released due to overflow from an underground storage tank.

Immediately upon arrival Cactus personnel established a containment line with booms and soil southwest of the spill site. The fuel had entered a drain inlet and migrated to a culvert ditch southwest of the fuel farm. A containment ditch was constructed and fuel was removed from the ditch via vacuum truck.

The asphalt adjacent to the fuel farm was removed due to contamination and emulsification. The concrete was washed with a hydro-jetter with all wash water being captured via vacuum truck. All free products were removed from the surface of the soil around the perimeter of the concrete and along the culvert ditch.

Boom lines were established along the culvert ditch as well as at the west end of the ditch to prevent any further contamination. The soil from the construction of the containment ditch was placed in a roll-off box for disposal. The site was covered with plastic sheathing and secured prior to departing the site.

## 6.0 Remediation Actions


No further remediation actions were performed by Cactus. The generator will perform any further required remediation of the site.

## 7.0 Summary

The spill cleanup was completed on the evening of May 5, 2000. One roll-off box was left on scene until the contents could be profiled for disposal. The site was secured with absorbent booms and heavy plastic sheathing.

Five hundred and seventy gallons of water impacted with jet fuel was disposed of at U.S. Filter.

Thirty-four cubic yards of impacted soil was disposed of at the CSC Avalon landfill. (All disposal manifests are included in Appendix C.)

  
Shannon O'Glee  
Sr. Product Manager

# Armstrong

Forensic Laboratory



330 Loch'n Green Trail Arlington, Texas 76012  
 817-273-2691 Fax: 817-275-1853

Andrew T. Armstrong, PhD  
 John M. Corn, MS, RS  
 Maxion K. Armstrong, MSPH, CIH  
 Scott J. Riley, DChem

December 28, 2000

Mr. Kevin C. Brant  
 Garner Environmental Services  
 3929 California Parkway East  
 Fort Worth, TX 76119

Received: December 19, 2000  
 Submitted: 1 Solid  
 P.O.No.: 00-D0500

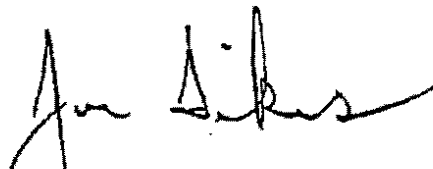
Site: Addison Airport  
 Addison, TX

LABORATORY REPORT: A0EN5060

Total Petroleum Hydrocarbons - TNRCC Texas Method 1005				
Lab Number	Client Description	C <sub>6</sub> to C <sub>10</sub> Hydrocarbons mg/kg	>C <sub>10</sub> to C <sub>25</sub> Hydrocarbons mg/kg	Total C <sub>6</sub> to C <sub>25</sub> mg/kg
A05060A-001A	1A - Disposal sample	89	2,200	2,289
Detection Limit		50	50	

BTEX - EPA Method 8021B					
Lab Number	Client Description	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Xylenes mg/kg
A05060A-001B	1B - Disposal sample	bdl	bdl	bdl	bdl
Detection Limit		0.2	0.2	0.2	0.2

bdl - below detection limit

  
 Joe Sikes, Director, Quality Control  
 AIHA Accreditation No: 363  
 AIHA ELLAP Accredited  
 //A0-5060.doc/t

## ARMSTRONG FORENSIC LABORATORY, INC.

## QA/QC ATTACHMENT REPORT: ADEN5060

Total Petroleum Hydrocarbons			
Analysis Method: TNRCC Texas 1005		Samples: A05080A-001A	
Analytical QC ID: GA321-101		Prep QC ID: GA321-101	
QC Data	C <sub>6</sub> to C <sub>10</sub> Hydrocarbons	>C <sub>10</sub> to C <sub>28</sub> Hydrocarbons	Units
Duplicate RPD	10.2	22	%
Laboratory Control Sample (LCS)	93	89	%
LCS Duplicate	103	111	%
Matrix Spike (MS)	103	100	%
MS Duplicate	103	115	%
Detection Limit	50	50	mg/kg
Matrix Blank	<50	<50	mg/kg

BTEX			
Analysis Method	EPA 8021B	Matrix Spike Recovery %	85
Extraction Method	EPA 5035	Duplicate RPD %	28
Prep QC ID	GA330-059	Method Blank µg	<0.01
Analytical QC ID	GA330-059	LCS %	94

# Armstrong

Forensic Laboratory



330 Loch'n Green Trail Arlington, Texas 76012  
817-275-2691 Fax: 817-275-1883

Andrew T. Armstrong, PhD  
John M. Carr, MS, FS  
Marion K. Armstrong, MSPH, CIH  
Scott J. Riley, DChem

December 28, 2000

Mr. Kevin C. Brant  
Garner Environmental Services  
3929 California Parkway East  
Fort Worth, TX 76119

Received: December 19, 2000  
Submitted: 1 Solid  
P.O.No.:00-D0500


Site: Addison Airport  
Addison, TX

LABORATORY REPORT: A0EN5060

Total Petroleum Hydrocarbons - TNRC Texas Method 1005				
Lab Number	Client Description	C <sub>6</sub> to C <sub>10</sub> Hydrocarbons mg/kg	>C <sub>10</sub> to C <sub>25</sub> Hydrocarbons mg/kg	Total C <sub>6</sub> to C <sub>25</sub> mg/kg
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Detection Limit		50	50	

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Lab Number	Client Description	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Xylenes mg/kg
A05060A-001B	1B - Disposal sample	bdl	bdl	bdl	bdl
Detection Limit		0.2	0.2	0.2	0.2

bdl - below detection limit

  
Joe Sikes, Director, Quality Control  
AIHA Accreditation No: 363  
AIHA ELLAP Accredited  
//A0-5060.doc/t

# Armstrong Forensic Laboratory, Inc. Received @ A 111 Chain of Custody

330 Loch'n Green Trail Arlington, Texas 76012-3481 817.275.2691 (voice) 817.275.1883 (fax) www.aflab.com

Date: \_\_\_\_\_

Environmental

Oct. 17, 2001

3:35 PM

GARRER F TRUENMANTAL

NO. 724

P. 15 21

Contact: <u>TODD JOHNSON</u>			Project: <u>ADDISON EXPRESS</u>			AFL Case No.: <u>AOE/14909</u>													
Client: <u>Grener Environmental</u>			Site: <u>4505 CLAIRE CHENAULT</u>			Date Received: <u>12-14-00</u>													
Address: <u>3929 CALIFORNIA BLVD</u>			Addison TX			TAT: <input checked="" type="radio"/> Regular <input type="radio"/> Rush <input type="radio"/> Priority													
Ft. Worth TX 76119			Sampler:			Lab Services Requested													
Phone No.: <u>817-535-7229</u>			Fax No.: <u>817-535-8187</u>																
P.O. No.: <u>0000500</u>			Temp @ Receipt:																
Lab No.	Sample Information		Collection Information			Container Info.			BTX	TPH 1005	TCUP Benzene								
	Field No. and Sample Location	Matrix	Date	Time	G/C	#	Size	Pres.											
1	0000500	SOIL	12/14/00	1530	/	1	9oz.		/	/	/								
					/														
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Notes:			Released By: <u>[Signature]</u>			Date/Time: <u>14 DEC 00 1115</u>			Received By: <u>[Signature]</u>										
			Released By: _____			Date/Time: <u>12/14/00 1115</u>			Received at Lab By: <u>[Signature]</u>										

## ARMSTRONG FORENSIC LABORATORY, INC.

## QA/QC ATTACHMENT REPORT: A0EN4999

BTEX			
Analysis Method	EPA 8021B	Matrix Spike Recovery %	85
Extraction Method	EPA 5035	Duplicate RPD %	2.8
Prep QC ID	GA330-059	Method Blank $\mu\text{g}$	<0.01
Analytical QC ID	GA330-059	LCS %	94

Total Petroleum Hydrocarbons			
Analysis Method TNRCC Texas 1005		Sample: A04999A-001A	
Analytical QC ID GA321-098		Prep QC ID GA321-098	
QC Data	C <sub>6</sub> to C <sub>10</sub> Hydrocarbons	>C <sub>10</sub> to C <sub>28</sub> Hydrocarbons	Units
Laboratory Control Sample (LCS)	112	112	%
LCS Duplicate	105	101	%
Matrix Spike (MS)	101	93	%
MS Duplicate	95	90	%
Detection Limit	50	50	mg/kg
Matrix Blank	<50	<50	mg/kg

TCLP Benzene			
Analysis Method	EPA 8021B	Matrix Spike Recovery %	90
Extraction Method	EPA 1311	Duplicate RPD %	1.1
Prep QC ID	GA320-167	Method Blank $\mu\text{g}$	<0.01
Analytical QC ID	GA330-061	LCS %	91

# Armstrong

## Forensic Laboratory



330 Loch's Green Trail Arlington, Texas 76012  
817-275-2691 Fax: 817-275-1633

Andrew T. Armstrong, Ph.D  
John M. Corn, MS, FS  
Marion K. Armstrong, MSFH, CIH  
Scott J. Riley, D.Chem

December 21, 2000

Mr. Todd Johnson  
Garner Environmental Services  
3929 California Parkway East  
Fort Worth, TX 76119

Received: December 14, 2000  
Submitted: 1 Solid  
P. O. No.: 00-D0500

Site: Addison Express  
4505 Claire Chennault  
Addison, TX

### LABORATORY REPORT: A0EN4999

BTEX - EPA Method 8021B						
Lab No.	Client Description	Benzene	Toluene	Ethyl Benzene	Xylenes	Units
A04999A-001A	00D0500	bdl	bdl	bdl	0.9	mg/kg
<b>Detection Limit</b>		0.2	0.2	0.2	0.2	mg/kg
bdl - below detection limit						

Total Petroleum Hydrocarbons - TNRCC Texas Method 1005					
Lab No.	Client Description	C <sub>8</sub> to C <sub>10</sub> Hydrocarbons	>C <sub>10</sub> to C <sub>28</sub> Hydrocarbons	Total C <sub>8</sub> to C <sub>28</sub>	Units
A04999A-001A	00D0500	bdl	917	917	mg/kg
<b>Detection Limit</b>		50	50		mg/kg
bdl - below detection limit					

Benzene - EPA Method 8021B				
TCLP Extraction - EPA Method 1311				
Lab Number	Client Description	Results	Detection Limits	Units
A04999A-001A	00D0500	2	2	µg/L

*Joe Sikes*  
Joe Sikes, Director, Quality Control  
AIHA Accreditation No: 363  
AIHA ELLAP Accredited  
//ac-4999.doc /drj



GENERATOR/MAILING ADDRESS FOR ORIGINAL

Addison Express		
ASOS Clare Chennault		
Addison	TX	75001
City	State	Zip
Edward Morales	972-713-7300	
Contact	Phone	

2353 002186

12783



REPUBLIC

SERVICES, INC.

1-800-256-9278

NON-HAZARDOUS WASTE MANIFEST

Landfill Permit # 1209B

Location Avalon

GENERATOR CERTIFICATE: I, as a representative of Addison Express  
 certify that this shipment consists of 20 cubic yards/tons of  
 non-hazardous Soil impacted with JET FUEL (name of waste material) and  
 is classified as follows:

- Non-hazardous petroleum contaminated soils, Waste Code Number SP1L 3012
- Non-hazardous Municipal Special Waste
- Non-hazardous industrial waste. If generated in Texas, it is a Class II waste assigned Waste Code Number \_\_\_\_\_
- Non-hazardous Railroad Commission Regulated waste from \_\_\_\_\_ facility or pit.
- Wastewater treatment plant, septic tank, grease trap, or grit trap waste from \_\_\_\_\_ facility or location, or \_\_\_\_\_
- Other, explain: \_\_\_\_\_

GENERATOR		
As Agent for Printed/Typed Name <u>TODD JOHNSON</u>	Signature 	Date Shipped Month Day Year <u>12 29 00</u>
TRANSPORTER		
Printed/Typed Name <u>A. DeLoach</u>	Signature 	Date Shipped Month Day Year <u>12 29 00</u>
LANDFILL OPERATOR CERTIFICATE OF RECEIPT OF WASTE		
Printed/Typed Name <u>Patsy McGraw</u>	Signature 	Date Shipped Month Day Year <u>12 29 00</u>

DO NOT SEPARATE FORM UNTIL ALL SIGNATURES ARE COMPLETED AND WASTE HAS BEEN RECEIVED BY LANDFILL AND SIGNED BY LANDFILL OPERATOR.

004

GENERATOR/MAILING ADDRESS FOR ORIGINAL

Addison Express		
ASOS Phase Chemicals		
Addison	TX	75001
City	State	Zip
Edward Marate	972 713	
Contact	Phone	

2353002186

12784



REPUBLIC

SERVICES, INC.

1-800-256-9278

NON-HAZARDOUS WASTE MANIFEST

Landfill Permit # 1309B

Location Avon

Addison Express

GENERATOR CERTIFICATE: I, as a representative of \_\_\_\_\_ certify that this shipment consists of 80 cubic yards/tons of non-hazardous Soil impacted with SET FUEL (name of waste material) and is classified as follows:

- Non-hazardous petroleum contaminated soils, Waste Code Number SP14 3012
- Non-hazardous Municipal Special Waste
- Non-hazardous industrial waste. If generated in Texas, it is a Class II waste assigned Waste Code Number \_\_\_\_\_
- Non-hazardous Railroad Commission Regulated waste from \_\_\_\_\_ facility or pit.
- Wastewater treatment plant, septic tank, grease trap, or grit trap waste from \_\_\_\_\_ facility or location, or
- Other, explain: \_\_\_\_\_

As Agent For GENERATOR		
Printed/Typed Name <u>TODD JOHNSON</u>	Signature <u>[Signature]</u>	Date Shipped Month Day Year <u>12 29 00</u>
TRANSPORTER		
Printed/Typed Name <u>A. D. [Signature]</u>	Signature <u>[Signature]</u>	Date Shipped Month Day Year <u>12 29 00</u>
LANDFILL OPERATOR CERTIFICATE OF RECEIPT OF WASTE		
Printed/Typed Name <u>Pats/M'Graw</u>	Signature <u>[Signature]</u>	Date Shipped Month Day Year <u>12 29 00</u>

DO NOT SEPARATE FORM UNTIL ALL SIGNATURES ARE COMPLETED AND WASTE HAS BEEN RECEIVED BY LANDFILL AND SIGNED BY LANDFILL OPERATOR.

004

Fluid Type: UST  PST

US FILTER RECOVERY SERVICES (SOUTHWEST), INC.

OFF-SPECIFICATION PRODUCT MANIFEST

GENERATOR NAME Addison Express TRUCK # 309215

ADDRESS 4505 Claire Street CITY Addison STATE TX ZIP 75001

PHONE # CONTACT PERSON

US Filter Recovery Services (Southwest), Inc. 4415 East Greenwood Baytown, Texas 77520

STATE REGISTRATIONS # 81059 & A85348

U.S. EPA I.D. # TXD988089421

PHONE (800) 355-2383

U.S. D.O.T. REGISTRATION # 381565

NAME AND ADDRESS US Filter Recovery Services (Southwest), Inc. 2107 Quincy Street Dallas, TX 75212 (214) 637-6264

State Registration #39337 & A85347

U.S. EPA I.D. #TXD 987988359

Flammable Liquid, n.o.s., (Petroleum Product), 3, UN1993, PG II

ADDITIONAL INFORMATION: Emergency Contact: Arthur L. Radcliffe (800) 355-2383 or Chemtrec (800) 424-9300 North American Emergency Response Guide No. 128, Placard as Flammable Liquid (UN1993). Materials is Off-Specification Fuel Product, See MSDS for additional information.

GENERATORS CERTIFICATION: I hereby declare the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highways according to applicable international and national governmental regulations.

I certify that the material removed from the above premises is not hazardous waste as identified in 40 CFR Part 261, and does not contain PCB's as identified in 40 CFR Part 761. I verify the service times and explanations are correct.

Is this a petroleum-contaminated media or debris defined under 40 CFR 261.4(b)(10) subject to corrective action under 40 CFR 280?  Yes  No

PRINT/TYPE NAME SIGNATURE DATE

PRINT/TYPE NAME SIGNATURE DATE Unit No. Arrival Time: Departure Time:

DISCREPANCY AND EXPLANATION SPACE

- TREATMENT FACILITY
Baytown Treatment Facility
Corcoran Treatment Facility

PRINT/TYPE NAME SIGNATURE DATE

Fluid Type: UST  PST

US FILTER RECOVERY SERVICES (SOUTHWEST), INC.

OFF-SPECIFICATION PRODUCT MANIFEST



GENERATOR NAME	<u>Addison Express</u>	TRUCK #	<u>307265</u>
ADDRESS	<u>4505 Claire Chennault</u>	CITY	<u>Addison, TX</u>
		STATE	<u>TX</u>
		ZIP	<u>75001</u>
PHONE #	CONTACT PERSON		
<u>X</u>	<u>X</u>		

US Filter Recovery Services (Southwest), Inc. 4415 East Greenwood Baytown, Texas 77520	STATE REGISTRATIONS	# 81059 & A85348
	U.S. EPA I.D.	# TXD988089421
PHONE (800) 355-2383	U.S. D.O.T. REGISTRATION	# 381565

NAME AND ADDRESS	State Registration	#39337 & A85347
US Filter Recovery Services (Southwest), Inc. 2107 Quincy Street Dallas, TX 75212 (214) 637-6264	U.S. EPA I.D.	#TXD 987988359

<u>X</u>	Flammable Liquid, n.o.s., (Petroleum Product), 3, UN1993, PG II		<u>1.318</u>
----------	---	--	--------------

ADDITIONAL INFORMATION: Emergency Contact: Arthur L. Radcliffe (800) 355-2383 or Chemtec (800) 424-9300 North American Emergency Response Guide No. 128, Placard as Flammable Liquid (UN1993), Materials is Off-Specification Fuel Product, See MSDS for additional information.

GENERATORS CERTIFICATION: I hereby declare the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highways according to applicable international and national governmental regulations. I certify that the material removed from the above premises is not hazardous waste as identified in 40 CFR Part 261, and does not contain PCB's as identified in 40 CFR Part 761. I verify the service times and explanations are correct. Is this a petroleum-contaminated media or debris defined under 40 CFR 261.4(b)(10) subject to corrective action under 40 CFR 280?  Yes  No

PRINT/TYPE NAME	SIGNATURE	DATE
<u>Agent for</u>	<u>[Signature]</u>	<u>11-17-00</u>
<u>X</u>	<u>X</u>	<u>X</u>

PRINT/TYPE NAME	SIGNATURE	DATE	Unit No	Arrival Time	Departure Time
<u>Colba Terrace</u>	<u>[Signature]</u>	<u>11-17-00</u>	<u>307265</u>	<u>5:00 Am.</u>	<u>8:00 Pm</u>

DISCREPANCY AND EXPLANATION SPACE

P10 Jet Fuel from spill

PRINT/TYPE NAME	SIGNATURE	DATE
<u>[Signature]</u>	<u>[Signature]</u>	<u>11/20/00</u>

TREATMENT FACILITY

Baytown Treatment Facility  
4415 East Greenwood  
Baytown, TX 77520  
EPA ID #: TXD988089421  
State Reg. #: 81059 & A85348

Corsicana Treatment Facility  
2124 East Highway 31  
Corsicana, TX 75110  
EPA ID #: TXD988059291  
State Reg. #: 29095

Exhibit C  
Letter from EA Engineering



EA Engineering, Science, & Technology, Inc.  
1420 Valwood Parkway, Suite 170  
Carrollton, Texas 75006  
Phone: (972) 484-1420 Fax (972) 247-7220

April 17, 2001

Mr. David Pierce  
Addison Airport  
4651 Airport Parkway  
Addison, Texas 75001

Re: Closure of Leaking Petroleum Storage Tank (LPST) Case, Fuel Farm Located at Southwest Corner of Addison Road at Roscoe Turner Street, Addison, Dallas (Dallas County), Texas (LPST ID No. 91471, Facility ID No. 0000022).

Dear Mr. Pierce:

EA Engineering, Science, and Technology (EA) has provided environmental consulting services to the former Addison Airport of Texas, Inc. (AATI, Sam Stuart) associated with the referenced LPST case. In December, 2000 EA submitted a Site Closure Request Form to the TNRCC, along with a Cost Preapproval Proposal and Work Plan for the plugging and abandonment (P&A) of four monitor wells associated with the LPST case, and preparation of the Final Site Closure Report. On March 13, 2001 the TNRCC submitted a Corrective Action Response Form approving the proposed costs for the P&A of the monitor wells and the preparation of the Final Site Closure Report to Mr. Stuart of the former AATI. On March 20, 2001 Mr. Stuart received a letter from the TNRCC concurring that the LPST case at the site has met closure requirements and the monitor wells should be removed.

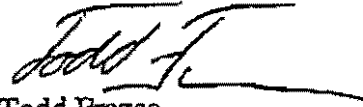
EA contacted Mr. Stuart and was informed that AATI is no longer responsible for management of Addison Airport and was directed to contact you about the P&A of the monitor wells. Mr. Stuart told EA that Washington Staubach Addison Airport Joint Venture was the Responsible Party for the remaining activities associated with the LPST case. Per the Texas Water Code, all of the monitor wells must be plugged within 180 days of case closure. The Final Site Closure Report should be submitted to the TNRCC within 30 days of the P&activities.

David Pierce  
Addison Airport

April 17, 2001  
Page 2

Attached are the TNRCC CARF, Letter of Concurrence, and the Cost Preapproval Proposal for Site Closure Activities. EA will perform the P&A of the monitor wells and complete the Final Site Closure Report for the TNRCC approved amount of \$3,342. Also attached are EA's Standard Terms and Conditions. The TNRCC Cost Preapproval Proposal approved by the TNRCC will serve as Exhibit A. In order to authorize EA to perform the P&A activities, please sign the terms and conditions and fax the signed copy to EA. Retain the original for your files. If you have any questions, please feel free to call Roger Place or me at (972) 484-1420.

Sincerely,



Todd Frazee  
Project Manager  
CAPM 01237

cc: Mr. Sam Stuart  
(4505 Claire Chennault, Dallas, Texas 75248)

attachments



## CONSULTING SERVICES AGREEMENT

EA as used herein means EA Engineering, Science, and Technology, Inc.

Client as used herein means the other party to this Agreement.

WHEREAS, EA provides an extensive range of integrated and comprehensive consulting, engineering, scientific, and analytical services; and

WHEREAS, Client desires to utilize EA's services.

NOW, THEREFORE, for good and valuable consideration, EA agrees to provide the professional services described herein, and Client agrees to accept and pay for such services, all in accordance with the following terms and conditions:

### 1. Definitions

The following terms shall have the meanings set forth below whenever they are used in this Agreement:

- a) "Scope of Work" (SOW) shall mean the description of the services to be provided by EA as mutually agreed upon by EA and Client, and will be performed on either a fixed price or time and materials basis. The SOW and the Price will be set out in the attached Exhibit "A" (or EA's Proposal letter), incorporated by reference into this Agreement.
- b) "Documentation" shall mean deliverable documentation as described in the SOW.
- c) "Equipment" shall mean all indoor and outdoor equipment used by EA at Client sites for the purpose of providing services as described in the SOW.
- d) "Proprietary Information" shall mean all data, information, manuals, materials, trade secrets, patents, products, processes, plans, whether in written, graphic or oral form, and similar proprietary know-how of EA.

### 2. Compensation/Billing

EA's invoices will be issued at least monthly and are payable upon receipt. Balances thirty (30) days past due are subject to interest at 1.5% per month. After five (5) days written notice, EA may suspend services under any Client Agreement until all past due accounts have been paid.

The SOW is often not fully definable prior to the execution of this Agreement as investigation may uncover additional facts and information requiring an alteration in the SOW and/or the Price for the services. For services on a time and materials basis, the proposed fees are EA's best estimate of the charges required to complete the SOW. EA will inform Client of any material changes to either the SOW or the Price that may be required and which may alter the terms of this Agreement.

Costs and schedule commitments are subject to renegotiation for unreasonable delays caused by Client's failure to provide free access to sampling areas, specified facilities, or information, or for delays caused by unpredictable occurrences, or force majeure, such as fires, floods, strikes, riots, unavailability of labor or materials or services, acts of God or of the public enemy, or acts or regulations of any governmental agency. Temporary work stoppage caused by any of the above may result in additional cost beyond that outlined in this Agreement.

In the event EA is required to respond to a subpoena, government inquiry or other legal process related to the services in connection with a proceeding to which it is not a party, Client shall reimburse EA for its costs and compensate EA at its then standard rates for the time spent gathering information and documents. Client agrees to compensate EA at the rate of one and one-half times EA's then current hourly rates for time spent in any deposition, hearing, proceeding or trial.

For services provided on a time-and-materials basis, the minimum time segment for field work is four (4) hours and one hour for work done at any of EA's offices. The rental or use of EA's Equipment will be charged to the project in accordance with EA's "Corporate Equipment Rate Billing Schedule" which is either incorporated into the rates shown in Exhibit B, or is available upon Client's request. Rates are subject to annual adjustment each September. EA's labor rates for services provided on a time-and-materials basis, are fixed for one year with annual adjustment upon notice to Client.

Expenses related to the services and reimbursable by Client ("Other Direct Costs") include without limitation, travel and living expenses, phone, FAX, overnight delivery services, postage, shipping, and production costs; identifiable drafting and word processing supplies; equipment usage and rental fees; and expendable materials and supplies. Other Direct Costs are reimbursable by Client and are billed at EA's cost plus 20 percent.

Required subconsultant and/or subcontractor costs are reimbursable by Client and are billed at EA's cost plus 20%. Any local or state taxes or fees (except state income taxes), such costs are in addition to any quoted Price.

### 3. Termination

This Agreement may be terminated by either party in the event of substantial failure by the other party to fulfill its obligations under this Agreement through no fault of the terminating party. Such termination is effected upon providing: (1) not less than thirty (30) calendar days written notice, and (2) an opportunity for consultation with the terminating party prior to termination. Client will be responsible for all services and direct expenses associated with the project through the effective date of cancellation, plus reasonable fee(s) and/or expenses for reallocation and demobilization of personnel and equipment.

### 4. Confidential Information/Inventions

All Proprietary Information furnished by EA in connection with this Agreement, but not developed as a result of work under this Agreement or under prior agreements between Client and EA, shall be held confidential by Client, and returned to EA within thirty (30) days of the completion of the services or conclusion of the litigation wherein EA's services were provided.

All inventions, techniques, and improvements held by EA to be proprietary or trade secrets of EA prior to any use on behalf of Client, as well as all inventions, techniques, and improvements developed by EA independent of the services rendered to Client under this Agreement, remain the property of EA. Documents provided by Client will remain the Client's property, but EA may retain one confidential file copy.

### 5. Governing Law

This Agreement shall be deemed made in, and in all respects interpreted, construed, and governed by, the laws of the State of Maryland, U.S.A.. All disputes arising hereunder are to be resolved in the state and federal courts having jurisdiction of such disputes sitting in the State of Maryland or hearing appeals therefrom. Both parties consent to the jurisdiction of such courts over them for the purposes of this Agreement, and agree to accept service of process by registered mail.

### 6. Standard of Care

EA will prepare all work and provide services in accordance with generally accepted professional practices ordinarily exercised by reputable companies performing the same or similar services in the same geographic area. NO WARRANTIES OR GUARANTIES, EXPRESS OR IMPLIED, ARE MADE WITH RESPECT TO ANY GOODS OR SERVICES PROVIDED UNDER THIS AGREEMENT, AND ANY IMPLIED WARRANTIES



**OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE EXPRESSLY DISCLAIMED.**

Client shall furnish documents or information reasonably within Client's control and deemed necessary by EA for proper performance of its services. EA may rely upon Client-provided documents in performing the services required under this Agreement and EA assumes no responsibility or liability for their accuracy.

Client agrees to advise EA, no later than upon the execution of this Agreement, of any hazardous substance or any condition, known or that reasonably should be known by Client, existing in, on, or near the site where EA's services are to be performed, that presents a potential danger to human health, the environment, or EA's equipment. Client agrees to a continuing obligation to provide EA related information as it becomes available to the Client. By virtue of entering into this Agreement or providing services hereunder, EA does not assume control of, or responsibility as an operator or otherwise for, the site or the person(s) in charge of the site, or undertake responsibility for reporting to any federal, state or local public agencies any conditions at the site that may present a potential danger to public health, safety or the environment. Client agrees to notify the appropriate federal, state or local public agencies as required by law; or otherwise to disclose, in a timely manner, any information that may be necessary to prevent damage to human health, safety, or the environment.

Upon Client's request, EA's work product may be provided on magnetic media. By such request, Client agrees that the written copy retained by EA in its files shall be the official base document. The Client will retain one conformed written copy. EA makes no warranty or representation to Client that the magnetic copy is accurate or complete. Any modifications of such magnetic copy by Client shall be Client's risk and without liability to EA. Such magnetic copy is subject to all conditions of this Agreement.

**7. Indemnification**

Each party shall indemnify, defend and hold harmless the other party from and against all liability, loss, cost, expense, or damage caused by the indemnifying party's negligent acts or negligent omissions in the performance of this contract. However in the event of any loss, damage or liability, whether to person or to property, arising out of the sole negligence of either EA or Client, such party will assume full responsibility for any liability arising thereof and hold harmless the other party. EA and Client further agree that if either EA or Client engages in willful misconduct, such party shall assume full responsibility for any liability arising thereof irrespective of the nature and degree of the other party's negligence, and will indemnify and hold harmless the other party. In no event shall EA be liable for any special, incidental, economic, or consequential damages whatsoever, regardless of the legal theory under which such damages may be incurred. In no event will EA's liability under this provision or Agreement exceed the lesser of the fees actually paid to EA under this Agreement or \$50,000.

For claims related to or involving pollution, toxic substances or hazardous wastes or for any other claims arising from underground hazards, Client agrees to release, defend, indemnify and hold harmless EA and its officers, directors, employees, agents, consultants, and subcontractors from all claims, damages, losses, and expenses, including, but not limited to, reasonable fees and expenses of attorneys and consultants, and court costs, arising out of the performance of this Agreement. Such indemnification and release includes claims which arise out of the actual, alleged, or threatened dispersal, escape, or release of chemicals, wastes, liquids, gases or any other material, irritant, contaminant or pollutant regardless of the legal theory under which such damages may be incurred.

EA's field personnel will avoid hazards or utilities which are visible to them at the site. EA is not responsible for any damage or loss to property owned by Client or third parties due undisclosed or unknown surface or subsurface conditions, except to the extent such damage or loss is a direct result of EA's negligence.

**8. Severability**

If any term or provision of this Agreement is held or deemed to be invalid or unenforceable, in whole or in part, by a court of competent

jurisdiction, this Agreement shall be ineffective to the extent of such invalidity or unenforceability without rendering invalid or unenforceable the remaining terms and provisions of this Agreement.

**9. Third Party Rights**

EA's services under this Agreement are being performed solely for the benefit of Client, and no other entity shall have any claim against EA because of this Agreement or the performance or nonperformance of services provided by EA hereunder.

**10. Entire Agreement**

This Agreement contains the entire agreement of the parties. It may not be modified or terminated orally. Any modification to these terms and conditions without the written approval of EA shall be null and void. In no event will the terms of any purchase order, work order or any other document provided by Client modify or amend this Agreement, even if it is signed by EA, unless EA signs a written statement expressly indicating that such terms supersede the terms of this Agreement. Any such terms are expressly rejected by EA.

**11. Assignment**

EA reserves the right to assign this Agreement to its affiliates, subsidiaries, or successors as necessary in order to effectively carry out and complete the services specified by this Agreement.

**ATTACHMENTS**

Exhibit A -

**EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.**

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**CLIENT**

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Plan B, CAP, and Site Closure Cost Proposal

LPST # 81471

Facility ID 00022

Responsible Party: Address: Agency: Date: Project Name and Address: Date: Project Name, City, State, Zip

Plan B Assessment of Corrective Action Plan: 08-01: Plan B Assessment: 08-01: Corrective Action Plan Preparation: 08-01: Site Closure

Table with columns: Description, Units, \$/Unit, Sub, Total. Rows include: Plan B Assessment (Soil Remediation, Groundwater Monitoring, etc.), Corrective Action Plan (CAP Preparation, etc.), and Total.

Site Closure

A. Personnel

Table with columns: Description, Units, \$/Unit, Sub, Total. Rows include: Office Costs, Field Costs, Personnel Preparation, etc.

C. Other Costs

Table with columns: Description, Units, \$/Unit, Sub, Total. Rows include: Deposit of Material, Soil, etc.

B. Rig Costs

Table with columns: Description, Units, \$/Unit, Sub, Total. Rows include: Mobilization, PDA Work, etc.

D. Travel

Table with columns: Description, Units, \$/Unit, Sub, Total. Rows include: Customer Truck, Mileage, Travel Time, etc.

E. Total Site Closure Proposed Cost

A + B + C + D = \$3,342

Signature lines for: EPCAP (Plan B), EPCAP (CAP), EPCAP (Site Closure), and EPCAP (Engineering, Planning and Technology).

Disclaimer text: I acknowledge that the EPCAP Plan... I understand that this information is not intended to be used for any other purpose...

Signature lines for: Address: Agency: Date: Project Name and Address: Date: Project Name, City, State, Zip

Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

March 14, 2001

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Dallas, Texas 75248

Re: File Review for Closure of Subsurface Release of Hydrocarbons at AATI Fuel Farm, 4788 Roscoe Turner, Dallas (Dallas County), Texas (LPST ID No. 91471 - Facility ID No. 0000022 - Priority 4.1) R-4

Dear Mr. Stuart:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon the submitted information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, we concur with your recommendation that the site has met closure requirements. Therefore, no further corrective action is necessary. The criteria includes, but are not limited to the following:

- groundwater concentrations indicate the contaminant plume is stable and declining;
- groundwater concentrations in all wells (except MW-2) are less than Category II, Plan A target levels;
- concentrations detected in MW-2 appear to be steady or declining;
- soil and groundwater contaminant levels are considered protective for construction workers based on calculated site specific target levels for this site; and
- soil contaminant levels are less than health based soil concentrations.

Please note that financial assurance must be maintained for all operational storage tanks at this site. Please be aware that case closure is based on identified exposure pathways and that any remaining contaminant levels and potential exposure pathways should be evaluated when conducting any future soil excavation or construction activities at this site. Please ensure that any wastes generated from these activities are handled in compliance with all applicable regulations.

Please be advised that all monitor wells which are not now in use and/or will not be used in the next 180 days must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title Title 16, Texas Administrative Code (TAC), Section 76.1004.

Mr. Stuart  
Page 2  
March 14, 2001

A State of Texas Plugging Report (Form No. TNRCC-0055) is required to be submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation, P.O. Box 12157, Capitol Station, Austin, Texas 78711, within thirty (30) days of plugging completion. If you have any questions regarding the future use of an existing monitor well, please contact the Texas Department of Licensing and Regulation at 512/463-7880 or 800/803-9202.

If there are to be any other necessary site restoration activities performed to complete site closure, complete a *Final Site Closure Report* and submit the report to the Texas Natural Resource Conservation Commission (TNRCC) Central Office in Austin to document actual site closure. For sites eligible for reimbursement through the Petroleum Storage Tank Remediation Fund, written preapproval should be obtained prior to initiation of site closure activities. Reimbursement claims for activities that are not preapproved will not be paid until all claims for preapproved work are processed and paid.

Please note that the *Final Site Closure Report*, if necessary, will be the last submittal associated with this case. This letter signifies the completion of corrective action associated with the release. No subsequent TNRCC correspondence will be issued in response to the *Final Site Closure Report*.

Please note that all correspondence must include the LPST and Facility ID Numbers and must be submitted to the TNRCC Central Office in Austin.

Should you have any questions, please contact Curt Champlin of Applied Earth Sciences, Inc (PST Privatization Contractor) at 512/990-7467 ext. 205. Please reference this LPST ID Number when making inquiries. Your cooperation in this matter has been appreciated.

Sincerely,



Dennis Rogers  
TNRCC Onsite Representative  
Petroleum Storage Tank-Responsible Party Remediation Section

DRR/scc  
91471.fnn

# TNRCC FAX TRANSMITTAL

DATE: 3-13-01 NO. OF PAGES (including this sheet): 3

TO: Name MR BRANDON GRIESEL  
 Organization ADDISON AIRPORT  
 Fax Number (972) 248-2416

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
 Name Curt Champlin  
Coordinator-AES, Inc.  
 Telephone 512/990-7467  
 Fax Number 512/239-2216  
 Mail MC-137, PO Box 13087, Austin, TX 78711-3087

NOTES: Response to Corrective Action Proposal(s) for  
 LPST #: 091471 , Facility ID: 000022.  
 If you have any problems receiving this fax, please  
 call 512/990-7467 .

Please note that new Corrective Action Preapproval Forms have been required since September 1, 1995. The forms are available at no cost by downloading from the TNRCC Bulletin Board Services (BBS) (512/239-0700), or over the Internet at <http://www.tnrcc.state.tx.us>. You may also order the forms on diskette from the TNRCC, MC-195, P.O. Box 13088, Austin, TX 78711-3088 (please specify the Corrective Action Preapproval Forms on diskette). A pamphlet with reproducible forms is available at no cost by calling TNRCC Publications at 512/239-0028.

Please note that all LPST corrective action proposals and reports need to be prepared by an environmental contracting/consulting firm registered as a Corrective Action Specialist (CAS) and need to have the the signatures and registration numbers of both the CAS and registered Corrective Action Project Manager (CAPM) included pursuant to Title 30, Texas Administrative Code (TAC), Subchapter J. Any proposal that has been prepared by a consulting firm not registered as a CAS by the Texas Natural Resource Conservation Commission (TNRCC) or which does not include the signature and registration number of the Project Manager may be rejected. Please reserve the use of the telefax machines for submitting proposals and data for LPST cases that rank as new priority 1's and for emergency abatement activities.

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 091471  
12/26/2000 Proposal For: SITE CLOSURE

### GENERAL INFORMATION

LPST-ID : 091471 Priority: 4.1  
 Responsible Party : ADDISON AIRPORT Tel: 972/248-7733  
 Facility # & Name : 000022 ADDISON AIRPORT  
 Facility Address : 4788 ROSCOE TURNER  
 Facility City : DALLAS County: DALLAS  
 CAPM & Name : CAPM01366 TODD NICKERSON  
 RCAS & Name : RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.

### TNRCC TECHNICAL RESPONSE

Proposed activity is approved as proposed.


Approval is for the plugging and abandonment of the four monitor wells. Please provide the required documentation upon completion of the project.


### ACTIVITY COST SUMMARY

Proposed Cost: 3,342.00 Maximum Pre-Approved: 3,342.00

Signature:  Date: 3/09/01 Telephone: 512/990-7467

Curt Chapman  
Coordinator-AES, Inc.

Approval:   
Jeff Freeman  
Project Manager, AES, Inc.

  
Emmanuel Ekpo or Maria Lebron or Dennis Rogers  
TNRCC On-site Representative  
Responsible Party Remediation Section

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

## LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 091471  
12/26/2000 Proposal For: SITE CLOSURE

Pursuant to 30 TAC Section 334.82 (b), you are required to notify all parties affected by the contamination. If you determine that contamination from the release has migrated off-site, or if you are required by the TNRCC to conduct further assessment or other corrective actions off-site, then you are required to notify the affected landowner(s) within 30 days of documenting the impact. Please note that landowners may include state and local owners of right-of-way properties. For the purpose of this requirement, notice shall be through any means described in 30 TAC Section 334.82 (a). Please provide documentation that the affected landowner(s) has/have been notified within 30 days of notification. Please note that failure to notify affected parties as required herein is grounds for formal enforcement proceedings.

Please note that preapproval of this activity DOES NOT guarantee reimbursement. Eligibility is determined at the time of reimbursement application review. If the release is eligible, the preapproved amount is the maximum allowable for the proposed activities. The actual amount of reimbursement will be determined after the completed reimbursement application and all related receipts and invoices are submitted, and the completed activity is subject to technical and reimbursable cost review. In all instances, the completed work must be technically justifiable and should serve to advance the site in the corrective action process. The amount of preapproved work performed should be based on completion of the activity's objectives. Additionally, please also note that preapproved amounts include all eligible markup.

Claims for reimbursement should only be submitted after the completion of an annual cycle for remediation system operation and maintenance, and quarterly groundwater monitoring unless a more frequent filing period is previously approved by the PST Reimbursement Section. The Reimbursement Section can be reached at 512/239-2001.

Exhibit D  
TNRCC Database Query Results for LPST ID # 91471





# Texas Natural Resource Conservation Commission

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	<a href="#">PST Technical and Registration Assistance</a>	<a href="#">Back to PST Registration Database Query Home Page</a>

## LPST Database Query Results

The data was last updated on October 3, 2001.

LPST ID #: 91471	Facility ID #: 000022
Facility Name: ADDISON AIRPORT	
Discovered: 8/15/87	Reported: 9/21/87
Facility Address: 4788 ROSCOE TURNER , DALLAS 75248-	
County: DALLAS	
TNRCC Region Number and City: 04, ARLINGTON	
Federal Facility?: N	
Responsible Party: ADDISON AIRPORT	
Address: 4505 CLAIRE CHENNAULT , DALLAS, TX 75248-	
Contact: MR BRANDON GRIESEL,	Phone: 972 248-7733
Priority Code and Description: 4.1, GW IMPACTED, NO APPARENT THREATS OR IMPACTS TO RECEPTORS	
Status Code and Description: 6P, FINAL CONCURRENCE PENDING DOCUMENTATION OF WELL PLUGGING	
Water Contaminated?: Y	Depth to Water: 3.2
Coordinators: Primary: 1P/1/1P/1 RPR: SCC DISTRICT: RLG	

Glossaries of terms used in the [Correspondence](#) and [TNRCC Action](#) columns.

Correspondence						
Correspondence Type	Correspondence Date	Last Action	Current Coord	TNRCC Action	Action Date	TNRCC Staff
GENL INFO	9/22/1987			NLR	12/21/1987	PKF
PHASE1RPT	11/6/1987			CAD a	12/21/1987	PKF
GENL INFO	1/28/1988			NLR	7/24/1996	SAH
PHASE2RPT	3/7/1988			NLR	7/24/1996	SAH

SAR OPT 1	1/11/1996	CLARIFY1-6	12/28/1992	JFH
RQT EXSTN	2/29/1996	ACTN RQST	3/2/1993	RRP
OTHER	3/27/1996	STARTUP	9/1/1995	WDC
PROP ACT 5	7/1/1996	STARTUP-OD	11/9/1995	WDC
RBA	6/13/1997	NLR	7/24/1996	SAH
TECH RESP	8/7/1997	NLR	7/24/1996	SAH
PROP ACT 5	2/9/1998	NLR	7/24/1996	SAH
ASS A- ADD	5/6/1998	SAR-RPT-OD	6/24/1996	WDC
ASS A- ADD	5/6/1998	RR - CAR	7/24/1996	SAH
PROP ACT 8	5/6/1998	REF - PRIV	7/8/1996	RPR
PROP ACT 5	5/6/1998	RR	7/8/1997	SAH
PROP ACT13	8/7/1998	RR	1/7/1998	SAH
SCR	8/7/1998	RR - CAR	3/5/1998	SAH
ASS A- ADD	8/7/1998	SUPERSEDE	5/27/1998	SAH
PROP ACT 8	10/16/1998	RR	5/27/1998	SAH
MONIT ANNL	3/16/1999	RR - CAR	5/27/1998	SAH
PROP ACT13	3/16/1999	REJ TECH	8/26/1998	SAH
SCR	3/16/1999	REJ TECH	8/26/1998	SAH
REL DET	7/16/1999	RR	8/26/1998	SAH
SCR	1/11/2001	RR - CAR	11/5/1998	SAH
PROP ACT13	1/11/2001	RR	4/6/1999	MMW
		REJ TECH	4/6/1999	MMW
		REJ TECH	4/6/1999	MMW
		REF - RPR	4/12/1999	ASM
		NLR	8/5/1999	ZJL
		FINAL	3/14/2001	SCC
		RR - CAR	3/9/2001	SCC
		REF - PRIV	2/23/2001	REE

Corrective Action Response Forms	
LPST ID: 91471	CARF Sequence Number : 1
Applicant: MARISA A. BASSO	
Activity: 04-3 RISK-BASED ASSESSMENT (RBA)	
Corrective Action Project Manager: CAPM00251	
Corrective Action Specialist: RCAS00328 TRIAD ONSITE SYSTEMS, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 6/4/1996	TNRCC Response Date: 7/24/1996
Proposed Amount: \$ 21,637.00	Approved Amount: \$ 21,387.00
Approved/Not Approved: approved as proposed, but for a reduced amount.	
<p><b>TNRCC Technical Response:</b>                      Please submit a site plan which depicts the proposed soil boring/monitoring well locations for TNRCC approval prior to mobilization. For your reference, all future workplans and cost proposals should contain a site plan.</p> <p>Please note that releases of jet fuel are not eligible for reimbursement. If the results of the assessment indicate that the impact is due to a jet fuel release or a commingled release, future corrective actions will not be reimbursible.</p> <p>Please begin installing the borings directly in the source area, and only install as many borings as are necessary to meet the requirements of the risk-based assessment. An appropriate number of the proposed monitoring wells should be installed directly in the source area(s) to adequately characterize the maximum extent and concentration of contamination.</p>	

The workplan does not mention that one groundwater sample will be analyzed for PAHs; however, the cost to do so was included in the cost proposal. Please analyze the groundwater sample which exhibits the highest TPH concentration for PAHs, the cost of which is included in the preapproved total cost.

The workplan did not mention that samples would be analyzed for VOCs; however, the cost proposal included one soil and one groundwater VOC analyses. VOC analysis is not required for assessment of gasoline and jet fuel releases. The cost for the two VOC analyses have been subtracted from the total preapproved cost.

Information in our case file indicates that phase-separated hydrocarbon (PSH) was observed on the groundwater in the excavation during tank removal activities. Should PSH be observed during the assessment, immediate abatement measures must be implemented. The cost to recover PSH only (gasoline) does not require preapproval for reimbursement consideration; however, costs will be subject to reimbursement cost review.

LPST ID: 91471	CARF Sequence Number : 2
Applicant: WILLIAM FRAZEE	
Activity: 04-4 OTHER - ASSESSMENT	
Corrective Action Project Manager: CAPM01237	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 2/6/1998	TNRCC Response Date: 3/5/1998
Proposed Amount: \$ 13,286.00	Approved Amount: \$ 11,345.00
Approved/Not Approved: approved with the following modifications:	
<p>TNRCC Technical Response:</p> <p>Approval is granted for the proposed scope of work with modifications. Please note that the preapproval of costs is conditional upon conclusive demonstration that corrective action activities associated with the released product(s) at the site are eligible for reimbursement. Please note the following comments and incorporate the necessary modifications:</p> <ul style="list-style-type: none"> <li>- TPH analysis using EPA Method 418.1 is no longer required or preapproved by this Office. Analysis via Method 1005 should be performed only. In addition, since this is a gas chromatograph method, the results should be sufficient to "fingerprint" the contamination in terms of demonstrating the type(s) of petroleum hydrocarbons present in the subsurface. Therefore, only 16 TPH soil analyses and 4 TPH groundwater analyses by Method 1005 are included in the preapproved amount.</li> <li>- PAH analysis need only be conducted on the highest TPH concentrations per medium in order to provide characterization of the maximum concentrations of these compounds. One PAH soil analysis associated with the soil samples collected from the confirmation borings for B-1 and one PAH soil analysis for samples collected from the monitor wells (two total PAH soil analyses), and only one PAH groundwater analysis is included in the total preapproved amount. In addition, PAH characterization on the soil samples collected from the monitor wells need only be performed if TPH concentrations are detected at levels higher than characterized for the B-1 confirmation borings.</li> <li>- Consideration should be given to collecting a soil sample, which is representative of the impacted zone but obtained from a non-impacted area, for geotechnical parameters.</li> <li>- Please note that the total preapproved amount is based on the new Reimbursable Cost Guidelines which went into effect October 22, 1997. After November 22, 1997, all proposals must be submitted on the revised preapproval forms as provided in the October 1997 version of RG-111 or the proposal(s) may be rejected. Please note that the new Reimbursable Cost Guidelines and October 1997 version of RG-111, including the new cost proposal forms, are available on the TNRCC website at <a href="http://www.tnrcc.state.tx.us/waste/pst/index.html">www.tnrcc.state.tx.us/waste/pst/index.html</a>.</li> </ul>	

- Based on the above-referenced Reimbursable Cost Guidelines, the maximum allowable amount for cost proposal preparation is \$115.

LPST ID: 91471	CARF Sequence Number : 3
Applicant: WILLIAM FRAZEE	
Activity: 04-4 OTHER - ASSESSMENT	
Corrective Action Project Manager: CAPM01237	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 4/30/1998	TNRCC Response Date: 5/27/1998
Proposed Amount: \$ 5,936.00	Approved Amount: \$ 5,936.00
Approved/Not Approved: approved as proposed.	
<p>TNRCC Technical Response:</p> <p>Preapproval is granted for the installation of up to eight shallow soil borings to delineate hydrocarbon impacts to soil. Please note the following comments:</p> <ul style="list-style-type: none"> <li>- Soil concentrations at depths less than 15 feet exceed construction worker default target levels at former boring B-1 installed in 1996, but this boring was located immediately adjacent to the active tankfield. Please note that soil contamination which exceeds the default target levels for protection of the construction worker population but is present immediately adjacent to an active tankfield may be qualitatively eliminated from exposure consideration, because it is unlikely that construction work by a non-UST contractor will be performed in this area. Therefore, rather than delineating soil impacts documented near to tankfield to Category II target levels, delineation should focus on defining soil contamination to below the construction worker default target levels both beyond the active tankfield and toward all potential construction worker points of exposure. Only as many of the eight proposed boring which are necessary to accomplish this task need be installed.</li> <li>- Only the applicable updated worksheets and attachments of the Assessment Report Form (ARF) should be submitted to report the results of the additional assessment activities, rather than a Field Activity Report.</li> <li>- Please ensure that Attachment 15 of the updated ARF includes all of the analytical data obtained for the site during all corrective action activities performed to date.</li> </ul> <p>We have reviewed the updated ARF dated April 30, 1998. Please address the following comments:</p> <ol style="list-style-type: none"> <li>1. Attachment 11 was missing. A vapor survey was reportedly conducted at all accessible underground utilities in the vicinity of the source area, but documentation of this activity was provided neither on Worksheet 9.0 nor Attachment 11. Please submit Attachment 11 which clearly illustrates the location of all underground utilities and the monitoring points measured during the vapor survey.</li> <li>2. Please note that only the worksheets and attachments which require revisions to document additional assessment work need to be submitted to update the ARF.</li> </ol>	

LPST ID: 91471	CARF Sequence Number : 4
Applicant: WILLIAM FRAZEE	
Activity: 07-1 QUARTERLY GW MONITORING (4 EVENTS/YR)	
Corrective Action Project Manager: CAPM01237	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 4/30/1998	TNRCC Response Date: 5/27/1998
Proposed Amount: \$ 5,506.00	Approved Amount: \$ 5,408.00
Approved/Not Approved: approved as proposed, but for a reduced amount.	
<p>TNRCC Technical Response:</p> <p>Preapproval is granted for three more quarters of groundwater monitoring. Please note the following comments:</p> <ul style="list-style-type: none"> <li>- The TNRCC has approved Method 1005 for TPH analyses. The maximum reimbursable cost for this analysis is \$62.50. After March 1, 1998, TPH analysis by Method 418.1 will not be preapproved. The use of Method 1005 is mandatory for the scope of work preapproved by this document, and the maximum allowable cost for Method 1005 is included in the total preapproved amount.</li> <li>- Although there does not appear to be a substantial groundwater contaminant plume, we request that, in order to verify plume stability, natural attenuation indicator data be collected during the next sampling event. If the indicator information does not exhibit a clear trend following the initial collection of the data, the indicators may be measured again during the subsequent sampling event. It is important that the natural attenuation indicator information be measured in wells which document background water concentrations, and in wells within and beyond the plume. Optimally, the indicator information will be collected from a series of wells positioned along the axis of the contaminant plume. Plume stability will be indicated when the extent of the contaminant plume appears to be stable or declining, and there is a clear trend with the indicator information which coincides with the location of the plume. Please refer to the April 29, 1997 TNRCC IOM entitled "Interim Guidance: Monitoring Natural Attenuation for Verification of Plume Stability." Much of this information must be collected in the field (i.e., Dissolved Oxygen, Ferrous Iron, Oxidation Reduction Potential, pH), while fixed laboratory analysis of Nitrates and Sulfates is acceptable. Please refer to the February 23, 1998 TNRCC IOM entitled "Preapproval Costs for Groundwater Monitoring of RNA Parameters" for the additional allowable costs to complete this task. If the cost to collect and analyze this information will exceed 7% of the total preapproved cost, a change order should be submitted for review prior to performing the additional tasks. If the cost to collect and analyze this information will exceed the total preapproved amount, but at a cost less than 7% of the total, a change order need not be submitted for approval of the additional costs until the scope of work is completed. Future monitoring proposals should clearly state which wells will be analyzed for the indicator data, and which data, if any, will be obtained through laboratory analyses rather than field methods.</li> <li>- For future proposals, please ensure that the subtotal of any subcontracted work is included in the applicable sections, so that allowable markup can be included in the total preapproved amount. The total preapproved amount does not include potentially eligible markup.</li> <li>- Additional PAH characterization need only be performed if TPH concentrations are detected in groundwater at levels which are greater than those previously characterized for this parameter.</li> </ul>	

LPST ID: 91471	CARF Sequence Number : 5
Applicant: WILLIAM FRAZEE	
Activity: 11-1 SITE CLOSURE	
Corrective Action Project Manager: CAPM01237	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 8/6/1998	TNRCC Response Date: 8/26/1998
Proposed Amount: \$ 3,057.00	Approved Amount: \$ 0.00
Approved/Not Approved:	
TNRCC Technical Response:	

LPST ID: 91471	CARF Sequence Number : 6
Applicant: WILLIAM FRAZEE	
Activity: 07-1 QUARTERLY GW MONITORING (4 EVENTS/YR)	
Corrective Action Project Manager: CAPM01237	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SAH	
Preapproval Proposal Date: 10/13/1998	TNRCC Response Date: 11/5/1998
Proposed Amount: \$ 1,244.00	Approved Amount: \$ 1,244.00
Approved/Not Approved: approved as proposed.	
TNRCC Technical Response: Preapproval is granted to include collection of natural attenuation indicator data and complete vapor monitoring surveys of all potential receptors and pathways during the remaining two quarters of groundwater monitoring.	

LPST ID: 91471	CARF Sequence Number : 7
Applicant: WILLIAM FRAZEE	
Activity: 11-1 SITE CLOSURE	
Corrective Action Project Manager: CAPM01237 EA	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by: GREG WULFERS	Serving as: Responsible Party
TNRCC Reviewer: MMW	
Preapproval Proposal Date: 8/3/1998	TNRCC Response Date: 4/6/1999
Proposed Amount: \$ 3,057.00	Approved Amount: \$ 0.00
Approved/Not Approved: not approved for these technical reasons:	
TNRCC Technical Response: We have completed a review of the Annual Groundwater Monitoring Report, the Site Closure Request, and all other available file information for the subject site. Site closure is not approved at this time. Please address the following items:	
<ol style="list-style-type: none"> <li>1. Groundwater in the source area has not been adequately assessed. Please submit a workplan and cost proposal for installation of a monitor well immediately adjacent to the former tankhold.</li> <li>2. Provide a site plan which illustrates all soil borings to date, the former 2,000-gallon gasoline UST tankhold,</li> </ol>	

and the other current and former USTs located in the fuel farm area.

3. The benzene level in the 4'-6' interval of boring HAB-2 exceeds the default construction worker target level. However, we have calculated an alternate target level by utilizing the Dallas-Fort Worth mean annual windspeed rather than the default windspeed (all other inputs were defaults). The resulting benzene target level for soil is 25.3 ppm. Using this target level, the contamination in HAB-2 does not present a risk to the construction/utility worker. If you choose to accept this target level, please do so in writing. Other alternatives are remediation of the elevated levels to the default value or calculation of site-specific target levels through a Plan B Risk Assessment.

4. Although they are not needed at this time, we offer the following target levels calculated as described in #3, for use if needed to evaluate elevated contaminant levels in the requested source area well. Groundwater: 28.8 ppm benzene, 65.9 ppm toluene, 22.4 ppm ethylbenzene, 204 ppm xylenes; soil: 582 ppm toluene, 2670 ppm ethylbenzene, 919 ppm xylenes. The listed TEX levels each have a Hazard Quotient of 1.

5. Please clarify the disposition of the backfill following tank removal activities.

6. Worksheet 6.0 of the Assessment Report Form references a 5/91 spill incident which required emergency response. Please provide additional information regarding this incident.

7. If you have any questions regarding this case after April 9, 1999, please contact the PST Responsible Party Remediation Section at 512/239-2200.

LPST ID: 91471	CARF Sequence Number : 8
Applicant: TODD NICKERSON	
Activity: 11-1 SITE CLOSURE	
Corrective Action Project Manager: CAPM01366	
Corrective Action Specialist: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.	
Request by:	Serving as:
TNRCC Reviewer: SCC	
Preapproval Proposal Date: 12/26/2000	TNRCC Response Date: 3/9/2001
Proposed Amount: \$ 3,342.00	Approved Amount: \$ 3,342.00
Approved/Not Approved: approved as proposed.	
TNRCC Technical Response: Approval is for the plugging and abandonment of the four monitor wells. Please provide the required documentation upon completion of the project.	

Run a new query.

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Last Modified: October 3, 2001

Exhibit E  
TNRCC Database Query Results for LPST ID # 98890





# Texas Natural Resource Conservation Commission

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## LPST Database Query Results

The data was last updated on October 3, 2001.

LPST ID #: 98890	Facility ID #: 0003036
Facility Name: MILLION AIR DALLAS	
Discovered: 5/6/91	Reported: 5/8/91
Facility Address: 4300 WESTGROVE , ADDISON 75248-	
County: DALLAS	
TNRCC Region Number and City: 04, ARLINGTON	
Federal Facility?: N	
Responsible Party: R & R INVESTMENTS INC	
Address: 4300 WESTGROVE , DALLAS, TX 75248-	
Contact: ,	Phone: 214 248-1600
Priority Code and Description: 4.2, NO GW IMPACT, NO APPARENT THREATS OR IMPACTS TO RECEPTORS	
Status Code and Description: 6A, FINAL CONCURRENCE ISSUED, CASE CLOSED	
Water Contaminated?: N	Depth to Water: 0
Coordinators: Primary: 1/2 RPR: RPR DISTRICT: MAB/WDB	

Glossaries of terms used in the Correspondence and TNRCC Action columns.

Correspondence						
Correspondence Type	Correspondence Date	Last Action	Current Coord	TNRCC Action	Action Date	TNRCC Staff
				STOP 3&4	11/10/1992	JFH
				STARTUP	9/1/1995	WDC
SAR OPT 1	2/7/1996	2/7/1996	RPR	FINAL	3/25/1998	ZL
				SAR-RPT-OD	6/24/1996	WDC
TECH RESP	7/5/1996	7/5/1996	RPR	RR	5/8/1997	ARP
WORK ACT 5	4/11/1997	4/17/1997	ARP	RR	5/8/1997	ARP
FAR	8/25/1997	8/25/1997	ZL	RR	9/17/1997	ZL
WORK ACT 5	11/6/1997			RR	12/4/1997	ZL
FAR	2/23/1998			FINAL	3/25/1998	ZL
OTHER	12/16/1998	12/16/1998	RPR			

Run a new query.

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Last Modified: October 3, 2001

Exhibit F  
Letter from TNRCC to Ray Stern

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

August 31, 1998

Mr. Ray Stern  
R. Stern F.B.O Limited Partnership  
4553 Keller Springs Road - Suite 2  
Dallas, Texas 75248

Re: Leaking Petroleum Storage Tank (LPST) Case Closure of Subsurface Release of Petroleum Hydrocarbons at the R. Stern F.B.O Fuel Farm 15411 Addison Road, Addison, (Dallas County), Texas. (LPST ID No. 110033, FAC ID - 0044612) - Priority 4.2

Dear Mr. Stern:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon the submitted information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, we determined that the site has met closure requirements. No further corrective action will be necessary.

Although contaminant concentrations were reported above TNRCC Screening Levels, the following criteria were used as justification for site closure:

- The analytical results indicated that the concentrations of the contaminants of concern (COCs) are below the commercial/industrial health based target soil concentrations.
- The site is currently being used as a fueling facility and the future use is expected to remain commercial.

For any subsequent release from an underground or aboveground storage tank at this site, the deductible will be increased in accordance with Section 26.3512 of the Texas Water Code. Please note that financial assurance must be maintained for all operational storage tanks at this site.

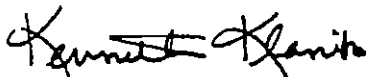
If there are to be any monitor well plugging or other necessary site restoration activities to complete site closure, complete a *Final Site Closure Report* and submit the report to both the local TNRCC Regional Field Office and to the Central Office in Austin to document actual site closure. For sites which are eligible for reimbursement through the Petroleum Storage Tank Remediation Fund, written preapproval should be obtained prior to initiation of site closure activities. Reimbursement claims for activities that are not preapproved will not be paid until all claims for preapproved work are processed and paid.

Mr. Ray Stern  
Page 2

Please note that the *Final Site Closure Report*, if necessary, will be the last submittal associated with this case. This letter signifies the completion of corrective action associated with the release. No subsequent TNRCC correspondence will be issued in response to the *Final Site Closure Report*.

All correspondence must include the LPST ID Number and submitted to both the local TNRCC Regional Field Office and the Central Office in Austin. Should you have any questions, please contact me or Mr. Sam Voore of my staff at 512/239-2200. Please reference the LPST ID Number when making inquiries. Your cooperation in this matter has been appreciated.

Sincerely,



Kenneth Klanika  
Acting Team Leader, Team I  
PST Responsible Party Remediation Section  
Remediation Division

SKV/mel  
110033.fnn

cc: Mr. Sam Barrett, TNRCC Region 4 Field Office, 817/469-6750  
1101 East Arkansas Lane, Arlington, Texas 76010-6499

Exhibit G  
TNRCC Database Query Results for LPST ID # 110033



# Texas Natural Resource Conservation Commission

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See Also:	<a href="#">LPST Database Query</a>	<a href="#">Reimbursement Database Query</a>
	<a href="#">PST Technical and Registration Assistance</a>	<a href="#">Back to PST Registration Database Query Home Page</a>

## LPST Database Query Results

The data was last updated on October 3, 2001.

LPST ID #: 110033	Facility ID #: 0044612
Facility Name: JET WAY	
Discovered: 8/9/95	Reported: 8/22/95
Facility Address: 4553 KELLER SPRINGS RD , ADDISON 75001-	
County: DALLAS	
TNRCC Region Number and City: 04, ARLINGTON	
Federal Facility?: N	
Responsible Party: JET WAY INC	
Address: PO BOX 701359 , DALLAS, TX 75370-	
Contact: MS JACQUELINA O'NEILL,	Phone: 214 387-4448
Priority Code and Description: 4.1, GW IMPACTED, NO APPARENT THREATS OR IMPACTS TO RECEPTORS	
Status Code and Description: 6A, FINAL CONCURRENCE ISSUED, CASE CLOSED	
Water Contaminated?: N	Depth to Water:
Coordinators: Primary: 1/1P/1 RPR: KRK DISTRICT: MAB	

Glossaries of terms used in the [Correspondence](#) and [TNRCC Action](#) columns.

Correspondence						
Correspondence Type	Correspondence Date	Last Action	Current Coord	TNRCC Action	Action Date	TNRCC Staff
OTHER	5/1/1998			LAD	12/19/1995	REE
				REF - PRIV	11/4/1998	ASM
				FINAL	8/31/1998	KRK

[Run a new query.](#)

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Last Modified: October 3, 2001

Exhibit H  
TNRCC Database Query Results for LPST ID # 112934





# Texas Natural Resource Conservation Commission

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<b>See Also:</b>	<a href="#">LPST Database Query</a>	<a href="#">Reimbursement Database Query</a>
	<a href="#">PST Technical and Registration Assistance</a>	<a href="#">Back to PST Registration Database Query Home Page</a>

## LPST Database Query Results

The data was last updated on October 3, 2001.

LPST ID #: 112934	Facility ID #: 0050235
Facility Name: CHERRY AIR FUEL FARM	
Discovered: 1/28/98	Reported: 1/28/98
Facility Address: 15405 ADDISON RD , ADDISON 75001-	
County: DALLAS	
TNRCC Region Number and City: 04, ARLINGTON	
Federal Facility?: N.	
Responsible Party: ADDISON AVIATION CHERRY AIR	
Address: 4584 CLAIRE CHENNAULT RD , DALLAS, TX 75248-	
Contact: MR JIM DONALDSON,	Phone: 972 248-1707
Priority Code and Description: 4.1, GW IMPACTED, NO APPARENT THREATS OR IMPACTS TO RECEPTORS	
Status Code and Description: 2, SITE ASSESSMENT	
Water Contaminated?: Y	Depth to Water:
Coordinators: Primary: 1/IP/1 RPR: RPR DISTRICT: RLG	

Glossaries of terms used in the [Correspondence](#) and [TNRCC Action](#) columns.

Correspondence						
<u>Correspondence Type</u>	<u>Correspondence Date</u>	<u>Last Action</u>	<u>Current Coord</u>	<u>TNRCC Action</u>	<u>Action Date</u>	<u>TNRCC Staff</u>
OTHER	2/17/1998			NLR	11/4/1998	SAH
REL DET	3/4/1998			NLR	11/4/1998	SAH
RBA	5/26/1998			RR	6/4/1998	DRR
WORK ACT 5	5/26/1998			RR	6/4/1998	DRR
				REF - PRIV	11/4/1998	ASM
				REF - RPR	3/23/1999	ASM
MES	7/19/1999			NLR	9/22/1999	BJR
MPR	7/19/1999	7/19/1999	ZJL			
SCR	7/19/1999			RR - CAR	9/22/1999	BJR

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Last Modified: October 3, 2001

Exhibit I  
Site Assessment Executive Summary for LPST ID # 112934

*Cherry - AIR, INC.*

LPST ID: 112934  
 Site Name: Addison Aviation Services, Inc  
 Site Location: 15405 Addison Rd. Addison, Texas

**EXECUTIVE SUMMARY**

Check all applicable boxes.

UST/AST System Status:  Active  Permanently Removed from Service  
 Temporarily Out of Service  Temporarily Indefinitely Out of Service (Variance Due Date: \_\_\_\_\_)

Current site land use:  
 vacant  indus./coml.  residential  agricultural  recreational  UST/AST Facility

Sources of Release:  tank(s)  piping  spills  dispenser  Other: \_\_\_\_\_

Substance Released:  
 gasoline  diesel  waste oil  hydraulic fluid  AV gas  jet fuel  Other: \_\_\_\_\_

Site Assessment History:  
 Preliminary/LSA  Groundwater Monitoring  Remedial Action  Emergency Response

Affected environmental media:  surficial soil (<2 ft. BGS)  soil (2 to 15 ft. BGS)  soil (> 15 ft. BGS)  
 groundwater  surface water  air

Identified affected receptors:  water wells  basements/structures  habitat  building  underground utilities  surface water  exposed contaminated soil  Other Distance from site (ft.): \_\_\_\_\_

Samples collected  yes  no Abatement initiated:  yes  no Type: \_\_\_\_\_

Identified potential receptors:  water wells  basements/structures  habitat  building  underground utilities  surface water  exposed contaminated soil  Other Distance from site (ft.): \_\_\_\_\_

Depth to first encountered groundwater (ft.) BGS:  >50  15-50  0-15

Presence of NAPLs (ft.):  
 sheen  0.1-0.5 ft.  0.5-2 ft.  2-5 ft.  >5 ft.  none Recovery Initiated:  yes  no

Current NAPL extent:  on-site  off-site No NAPL encountered during investigation

Dissolved-phase extent:  on-site  off-site  unknown

Groundwater beneficial use category:  
 Cat. I  Cat. II  Cat. III  Cat. IV  Soils only affected, regional beneficial use can not be established.

Contaminants of Concern Exceed Target Concentrations of Affected media:

- Soil (Worksheets 7.0, 11.1-5):  yes  no
- Groundwater (Worksheet 8 & 11.1-4):  yes  no
- Vapors (Worksheet 9.0):  yes  no
- Surface Water (Worksheet 10.0):  yes  no

Site Priority: 1. 2. 3. 4. 4.1

Recommended Actions:

- a) Affected Receptors Identified - Propose additional corrective action and/or monitoring program.
- b) Site does not exceed Plan A criteria - Submit site closure request form.
- c) Site does not exceed Plan A criteria - Propose verification groundwater monitoring program.
- d) Site exceeds Plan A criteria - Propose corrective action to achieve Plan A criteria.
- e) Site exceeds Plan A criteria - Propose Plan B risk assessment and/or evaluation.

LPST ID: 112934

**SITE DESCRIPTION**

**Location Description**

Facility Name: Addison Aviation Services, Inc.

Address: 15405 Addison Rd.

Cross-Street: North of Lindberg

City: Addison

County: Dallas

Current Site Water Supply: Site has no water supply

**Notes:**

The town of Addison acquires its water from the city of Dallas. The city of Dallas obtains most of its water from surface reservoirs. Some groundwater is obtained from two aquifers that underlie the area. The Woodbine Aquifer at 300 to 500 feet below surface with low to moderate yields of poor quality groundwater and the Travis Peak/Paluxy Aquifer at a depth of 1000 to 1200 feet with better supplies of better quality groundwater.

**Topography**

Terrain:  Flat  Steep  Variable

Ground Surface Slope

Direction west Grade (ft./ft.) 0.013

**Other Comments:**

*Discuss any significant onsite or adjacent significant topographic feature.*

The subject site has a moderate slope to the west

**Local Climate:**

Average Annual Rainfall (in.): 28" - 32"

Within 100 Year Floodplain:  yes /  no

**Other Comments:**

*Discuss recent (i.e., within the past year) extreme climatic changes. Discuss engineered modifications to floodplain status or designation.*

LPST ID: 112934

**RECEPTOR SURVEY**

**Underground Utility Survey**

**Other Comments:**

**Nearest Underground Utility**

Name: Water Main  
Type: Steel Pipe  
Depth of Utility: 4-5 feet  
Distance & Direction  
From Affected Zone: within affected zone

*Discuss other receptors and indicate on Attachment 2. If affected discuss abatement measures.*

During excavation for the installation of a new water main to be located approximately five feet north of the southern property boundary, NAPL was observed in the trench (see area denoted as open excavation on site map). The free product was removed by the RP from the trench until no more was observed. The buried storm sewer located west of the tanks was removed to facilitate excavation of impacted soil in that area. It has since been replaced. There is no indication that any other utility has been or will likely be impacted.

**Nearest Downgradient Utility**

Name: Telephone cable  
Type: 600 Pair Cable  
Depth of Utility: two feet  
Distance & Direction From  
From Affected Zone: Approximately 20 feet

**Building Survey**

**Other Comments:**

**Nearest Building**

Name: White Rock Lodge  
Type: Single story concrete foundation  
Distance & Direction  
From Affected Zone: Approx. 40 feet south

*Discuss nearest and other receptors and indicate on Attachment 2. Buildings should include residences, schools, day care facility, nursing home, etc.*

Groundwater contamination has yet to reach any of the four on site monitor wells. No buildings are located within 500 feet due east of the site, a commercial complex is located approximately 200 feet to the southeast. No contaminants have been detected in these directions.

**Nearest Downgradient Building**

Name: Addison Village  
Type: Retail Business Center  
Distance & Direction  
From Affected Zone: 200 feet southeast

**Surface Water Hydrology**

**Other Comments:**

**Nearest Surface Water**

Name: Rawhide Creek  
Type: Creek  
Distance & Direction  
From Affected Zone: Approx. 0.25 mi. sw

*If affected complete Worksheet 10.0. Describe potential for affected storm water or groundwater discharge to surface water feature.*

**Impacted Surface Water**

Name: None  
Type:  
Distance & Direction  
From Affected Zone:

**Nearest Downgradient Surface Water**

Name: White Rock Creek  
Type: Creek  
Distance & Direction  
From Affected Zone: Approx. one mile east

LPST ID: 112934

VAPOR ASSESSMENT

VAPOR DATA AND EVALUATION

Known vapor impact:  yes  no

Location:  ambient air  utilities  residences  
 hospital  school/day care  commercial buildings  other: \_\_\_\_\_

Lower Explosive Limit (LEL) concentrations:  not measured  measured  calculated<sup>1</sup>

NAPL present or soil concentration near saturation (for calculating soil vapor concentrations, refer to *Risk-Based Correction Action for Leaking Storage Tank Sites, RG-36*):  yes  no Depth (ft. BGS): \_\_\_\_\_

Vapor monitoring data:

Sample No.	Location	Depth	% LEL	Total Organic Vapors (ppmv)	Benzene (ppmv)	Other
V-01	Water Meter Box	1'	0	0		
V-02	Water Valve Box	1'	0	0		
V-03	Storm Sewer Inlet	1'	0	0		
V-04	Fenced Storage	surface	0	0		
V-05	Storm Sewer Discharge	1'	0	0		
V-06	Water Line Excavation	6'	0	0		
V-07	T Hangar	surface	0	0		

*If vapor concentrations exceed 25% of the LEL or other potential for explosive vapor exist in surface or subsurface structure, describe affected area, methods of determination, and any abatement measure. Identify and discuss any occupational or indoor air exposures to released contaminants. Provide all calculations for the determination of the target concentrations:*

See Attachment #11 for vapor sample locations.

<sup>1</sup>LEL% should reflect whole mixture evaluation. If more than one compound is present, actual measurement of vapors will typically be warranted.

# SITE ASSESSMENT

Worksheet 11.2

LPST ID: 112934

## PLAN A EVALUATION

### CATEGORY II: Soil and Groundwater Target Cleanup Level Determination

- Complete this worksheet for Category II sites. Indicate the maximum detected concentration for the chemicals of concern.
- If groundwater is > 15 feet BGS, calculate groundwater protective soil concentrations using the equilibrium partition equation on Worksheet 11.5 (when site specific geotechnical parameters have been analyzed).
- Check the box for each compound that exceeds the target concentrations. If any boxes are checked, further corrective action (i.e., monitoring, Plan B, CAP) will be required.
- If other chemicals of concern are present but not listed, refer to *Risk-Based Corrective Action for Leaking Storage Tank Sites (RG-36)*

Chemical of Concern	GROUNDWATER (mg/l)		SOIL (mg/kg)				
	TARGET CONC.	MAX. LAB. ANALYZED CONC.	Depth to Affected Soil ≤ 15 ft.		Depth to Affected Soil > 15 ft.		
			TARGET CONC.	MAX. LAB. ANALYZED CONC.	TARGET CONC.	MAX. LAB. ANALYZED CONC.	GW > 15 ft. CALC. SOIL CONC. C <sub>T</sub>
BENZENE	<input type="checkbox"/> 0.0294	<0.005	<input type="checkbox"/> 0.74	<0.40	<input type="checkbox"/> 0.74		
ETHYLBENZENE	<input type="checkbox"/> 3.65	<0.005	<input type="checkbox"/> 835	7.0	<input type="checkbox"/> 835		
TOLUENE	<input type="checkbox"/> 7.3	<0.005	<input type="checkbox"/> 503	6.6	<input type="checkbox"/> 503		
XYLENE	<input type="checkbox"/> 73	28	<input type="checkbox"/> 968	62	<input type="checkbox"/> 968		
ACENAPHTHENE	<input type="checkbox"/> 2.19		<input type="checkbox"/> 314	<0.330	<input type="checkbox"/> 314		
ANTHRACENE	<input type="checkbox"/> 11		<input type="checkbox"/> 13	<0.330	<input type="checkbox"/> 13		
BENZO(A)ANTHRACENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.330	<input type="checkbox"/> 32		
BENZO(B)FLUORANTHENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.330	<input type="checkbox"/> 129		
BENZO(K)FLUORANTHENE	<input type="checkbox"/> 0.0117		<input type="checkbox"/> 8.77 <sup>H</sup>	<0.330	<input type="checkbox"/> 47		
BENZO(A)PYRENE	<input type="checkbox"/> 0.000117		<input type="checkbox"/> 0.0877 <sup>H</sup>	<0.050	<input type="checkbox"/> 220		
CHRYSENE	<input type="checkbox"/> 0.117		<input type="checkbox"/> 7.2	<0.330	<input type="checkbox"/> 7.2		
DIBENZO(A,H)ANTHRACENE	<input type="checkbox"/> 0.000117		<input type="checkbox"/> 0.0877 <sup>H</sup>	<0.050	<input type="checkbox"/> 33		
FLUORANTHENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 156	<0.330	<input type="checkbox"/> 156		
FLUORENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 247	<0.330	<input type="checkbox"/> 247		
INDENO(1,2,3-CD)PYRENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.330	<input type="checkbox"/> 17		
NAPHTHALENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 389	2.2	<input type="checkbox"/> 389		
PYRENE	<input type="checkbox"/> 1.1		<input type="checkbox"/> 99	<0.330	<input type="checkbox"/> 99		
OTHER 2-methylnaphthalene	<input type="checkbox"/>		<input type="checkbox"/>	3.3	<input type="checkbox"/>		
OTHER	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		

H - Value represents health-based concentration



Exhibit J  
Insurance Documents from Fuel Farm Operators



ZURICH

# Certificate Of Insurance Storage Tank Systems

Policy No.	Eff. Date of Pol.	Exp. Date of Pol.	Eff. Date of End.	Producer	Add'l Prem.	Return Prem.
USC 3583889-1	04/15/01	04/15/02	04/15/01	11508		

**Named Insured and Mailing Address:**      **Producer:**      **Sub-Producer:**

ADDISON EXPRESS, LLC      FALCON INS AGENCY OF DALLAS, I  
 4500 CLAIRE CHENNAULT      P.O. BOX 706  
 ADDISON TX 75001      ADDISON TX 75001

### CERTIFICATE:

1. Zurich American Insurance Company, the Insurer, as identified above, hereby certifies that it has issued liability insurance covering the following underground storage tank(s):

Per Attached Scheduled Locations and  
Scheduled Storage Tank(s) Systems

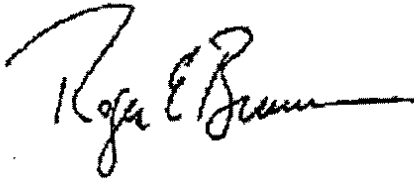
for taking corrective action and compensating third parties for bodily injury and property damage caused by accidental releases; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy; arising from operating the underground storage tank(s) identified above.

The limits of liability are \$1,000,000 each occurrence and \$1,000,000 annual aggregate, exclusive of legal defense costs which are subject to a separate limit under the policy. This coverage is provided under policy # USC 3583889-1. The effective date of said policy is 04/15/01

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this certificate applies.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third party, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in Title 30, TAC, §37.825 of this title (relating to Financial Test of Self-Insurance), §37.830 of this title (relating to Guarantee), §37.835 of this title (relating to Financial Test of Self-Insurance), §37.840 of this title (relating to Surety Bond), §37.845 of this title (relating to Letter of Credit) and §37.850 of this title (relating to Trust Fund).
  - c. Whenever requested by the Executive Director of the TNRCC, the Insurer agrees to furnish to the executive director a signed duplicate original of the Policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer, except for non-payment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Insured. Cancellation for non-payment of premium or misrepresentation by the Insured will be effective only upon written notice and only after expiration of a minimum of ten days after a copy of such written notice is received by the insured.

- e. The insurance covers claims otherwise covered by the Policy that are reported to the Insurer within six (6) months of the effective date of cancellation or non-renewal of the Policy except where the new or renewed policy has the same retroactive date or a retroactive date earlier than that of the prior policy and which arise out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Title 30, Texas Administrative Code, §37.835(b)(2), and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer in Texas.



Roger E. Brunner  
Assistant Vice President  
Authorized Representative of  
Zurich American Insurance Company  
One Liberty Plaza, 53<sup>rd</sup> Floor  
New York, New York 10006



Endorsement No.: 1

## AMEND NAMED INSURED

PRODUCER:  
FRANK SIDDON'S INSURANCE  
P O BOX 164077  
11612 RM 2244 (BEE CAVES RD)  
AUSTIN TX 78716

ISSUING OFFICE:  
Zurich North America  
301 MAC Avenue, Suite 210  
East Lansing, MI 48823  
TEL (517) 333-2588  
FAX (517) 333-1884

Policy Number	Eff. Date of Pol.	Exp. Date of Pol.	Eff. Date of End.	Producer	Add'l Prem.	Return Prem.
USC 3592272-2	03/26/01	03/26/02	03/26/01		\$0.00	NA

NAME INSURED: CHERRY AIR INC

ADDRESS: 4584 CLAIRE CHENNAULT  
DALLAS TX 75248

This endorsement modifies insurance provided by the following:  
STORAGE TANK SYSTEM THIRD PARTY LIABILITY AND CLEANUP POLICY

It is hereby understood and agreed the following changes have been made with respect to the interests in the properties shown in policy # USC 3592272-2 and are revised in the Declaration, Scheduled Endorsements, and Certification of that Policy:

THE NAMED INSURED'S ADDRESS FOR THE ABOVE REFERENCED POLICY  
HAS BEEN AMENDED AS FOLLOWS:

CHERRY AIR INC  
4584 CLAIRE CHENNAULT  
ADDISON TX 75001

All other terms and conditions shall apply and remain unchanged.

Signed by:


Authorized Representative

Date

**ADDED** DATE (MM/DD/YYYY) 09/14/01

THIS BINDER IS A TEMPORARY INSURANCE CONTRACT, SUBJECT TO THE CONDITIONS SHOWN ON THE REVERSE SIDE OF THIS FORM.

<b>PRODUCER</b> TOWNS (213) 639-9200 A&C Meds And Risk Services, Inc. of Southern California 707 Wilshire Boulevard Suite 6000 Los Angeles CA 90017-0460 USA	<b>COMPANY</b> Greenwich Insurance Company BINDER # 570080003215
<b>AGENCY</b> 18191216 Mercury Air Group, Inc. 3436 McConnell Avenue Los Angeles CA 90066-7062 USA	<b>DESCRIPTION OF OPERATIONS/INDUSTRY/SPECIFIC LOCATIONS (Location)</b> Operations at various Locations per schedule Pollution & Remediation Legal Liability  <b>THIS BINDER SUPERCEDES AND REPLACES PREVIOUSLY ISSUED BINDER.</b>

TYPE OF INSURANCE	COVERAGE / FORMS	DEDUCTIBLE	COINS	AMOUNT
<b>PROPERTY</b> <input type="checkbox"/> BASIC <input type="checkbox"/> BLDGAS <input type="checkbox"/> SPEC				
<b>GENERAL LIABILITY</b> <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR	RETRO DATE FOR CLAIMS MADE:			
<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> HIRED AUTOS				
<b>AUTO PHYSICAL DAMAGE</b> <input type="checkbox"/> COLLISION <input type="checkbox"/> OTHER THAN COLL <input type="checkbox"/> ALL VEHICLES <input type="checkbox"/> SCHEDULED VEHICLES				
<b>Garage Liability</b> <input type="checkbox"/> ANY AUTO				
<b>Workers Compensation and Employers Liability</b>				
<b>SPECIAL IDENTIFIERS / OTHER COVERAGE</b> Assigned Policy No. 820 000881-01 \$2,000,000 per occurrence/\$4,000,000 aggregate				
<b>ESTIMATED TOTAL PREMIUM</b>				971.419
<b>SHORT-TERM LOSS PAYOR</b>		<b>ADDITIONAL ROUNDS</b>		
<b>LOAN #</b>		<b>OTHER</b>		
AUTHORIZED SIGNATURE: 				

**ACORD CERTIFICATE OF LIABILITY INSURANCE** CSR - CR CHECKED DATE (MM/DD/YY) 03/13/01

**PRODUCER**  
 Falcon Ins Agy of Dallas, Inc.  
 P. O. Box 706  
 Addison TX 75001  
 Thomas W. Crull  
 Phone No. 972-250-0800 Fax No.

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

**INSURED**  
 Cherry-Air, Inc. and Addison  
 Aviation Services, Inc.  
 4584 Claire Chennault  
 Addison TX 75001

COMPANIES AFFORDING COVERAGE	
COMPANY A	Zurich U.S. Insurance Group
COMPANY B	
COMPANY C	
COMPANY D	

**COVERAGES:**  
 THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS								
	<b>GENERAL LIABILITY</b> <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input checked="" type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR <input type="checkbox"/> OWNER'S & CONTRACTOR'S PROT	USC 3592272-1	03/26/01	03/26/02	GENERAL AGGREGATE \$ 1,000,000 PRODUCTS - COMP/DP AGG \$ PERSONAL & ADV INJURY \$ EACH OCCURRENCE \$ 1,000,000 FIRE DAMAGE (Any one fire) \$ MED EXP (Any one person) \$								
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$								
	<b>DAMAGE LIABILITY</b> <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: EACH ACCIDENT \$ AGGREGATE \$								
	<b>EXCESS LIABILITY</b> <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$								
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE: <input type="checkbox"/> INCL <input type="checkbox"/> EXCL				<table border="1"> <tr> <td>WC STATUTORY LIMITS</td> <td>OTHER</td> </tr> <tr> <td>EL EACH ACCIDENT</td> <td>\$</td> </tr> <tr> <td>EL DISEASE - POLICY LIMIT</td> <td>\$</td> </tr> <tr> <td>EL DISEASE - EA EMPLOYEE</td> <td>\$</td> </tr> </table>	WC STATUTORY LIMITS	OTHER	EL EACH ACCIDENT	\$	EL DISEASE - POLICY LIMIT	\$	EL DISEASE - EA EMPLOYEE	\$
WC STATUTORY LIMITS	OTHER												
EL EACH ACCIDENT	\$												
EL DISEASE - POLICY LIMIT	\$												
EL DISEASE - EA EMPLOYEE	\$												
A	OTHER	USC 3592272-1	03/26/01	03/26/02									

**DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS**  
 1mm each corrective action, 1mm aggregate

**CERTIFICATE HOLDER**  
 ADDISON  
 TOWN OF ADDISON  
 4505 CLAIRE CHENNAULT  
 ADDISON TX 75001

**CANCELLATION:**  
 SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.  
 AUTHORIZED REPRESENTATIVE  
 Thomas W. Crull

FUEL FARM

CERTIFICATE OF INSURANCE

Policy Number: 16428  
Period of Coverage: From: 4/16/01 TO: 4/16/02

TANK OWNERS MUTUAL INSURANCE COMPANY,  
1600 West Seventh Street, Fort Worth, TX 76102-2505

Name of Insured: Million Air

Address of Insured:  
4300 Westgrove  
Addison, TX 75001

Certification:

1. TANK OWNERS MUTUAL INSURANCE COMPANY, the "Insurer" as identified above, hereby certifies that it has issued liability insurance covering the following underground storage tank(s):

Facility ID	Location Address	# UST
3036	4300 WESTGROVE DALLAS, TX 75248	5

for taking corrective action and/or compensating third parties for bodily injury and property damage caused by either accidental releases arising from operating the underground storage tank(s) identified above.

The limits of liability are \$1000000 for each occurrence and limits of liability are \$2000000 for the annual aggregate, exclusive of legal defense costs. This coverage is provided under Policy Number 16428. The effective date of said policy is: 4/16/01

2. The Insurer further certifies the following with respect to the insurance described in paragraph (1):
  - a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this certificate applied.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, to a damaged third party, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 334.95 through 884.100 of Title 30, Texas Administrative Code (relating to Financial Test of Self-Insurance; Guarantee; Insurance and Risk Retention Group Coverage; Surety Bond; Letter of Credit; and Trust Fund).
  - c. Whenever requested by the Executive Director of the Texas Natural Resource Conservation Commission, the Insurer agrees to furnish to the Executive Director of the Texas Natural Resource Conservation Commission signed duplicate copy of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in 334.97(b) (2) of Title 30, Texas Administrative Code and that the Insurer is licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer in Texas.

*Robert A. Ferguson*

Robert A Ferguson  
Member Services Representative  
Authorized Representative of Tank Owners Mutual Insurance Company  
1600 West Seventh Street, Fort Worth, TX 76102-2505

# TANK OWNERS MUTUAL INSURANCE COMPANY

ISSUE DATE: 2/14/01

NAMED INSURED: Million Air

Policy Number: 16428

Effective Date: 4/16/01

POLICY PERIOD: FROM: 4/16/01 TO: 4/16/02

## SCHEDULE OF DESIGNATED SITES

Facility ID	Location Address	# PST	Location Premium
3036	4300 WESTGROVE DALLAS, TX 75248 CLEAN UP COSTS Liability APPLIES CUC Retroactive Date: 12/23/98	5	3000

### Underground Tanks

Tank#1  
Year Installed: 1984  
Construction: Steel w/ Cathodic Protection  
Capacity: 12,000  
Leak Detection: Y  
Line Construction: Steel W/Cathodic Protection

Tank#2  
Year Installed: 1984  
Construction: Steel w/ Cathodic Protection  
Capacity: 12,000  
Leak Detection: Y  
Line Construction: Steel W/Cathodic Protection

Tank#3  
Year Installed: 1984  
Construction: Steel w/ Cathodic Protection  
Capacity: 12,000  
Leak Detection: Y  
Line Construction: Steel W/Cathodic Protection



Tank#4

Year Installed: 1984

Construction: Steel w/ Cathodic Protection

Capacity: 12,000

Leak Detection: Y

Line Construction: Steel W/Cathodic Protection

Tank#5

Year Installed: 1984

Construction: Steel w/ Cathodic Protection

Capacity: 5000

Leak Detection: Y

Line Construction: Steel W/Cathodic Protection

**TANK OWNERS MUTUAL  
INSURANCE COMPANY**

800-336-1338

Policy Number: 16428

**POLLUTION LIABILITY  
INSURANCE POLICY**

**RENEWAL CERTIFICATE**

Item 1: Million Air  
4300 Westgrove  
Addison, TX 75001

Item 2: **POLICY PERIOD:**  
**FROM: 4/16/01 TO: 4/16/02**  
12:01 AM Standard Time at address of NAMED INSURED shown above.

Item 3: **PREMIUM: \$3000**

In consideration of the renewal premium stated, the above-numbered policy is renewed for period specified, subject to the terms and conditions thereof, except as otherwise specified herein.

No changes from previous term

Changes as shown on the attached endorsement(s).

TM1002 TM1006

Item 4: **ORIGINAL POLICY INCEPTION DATE: 4/16/98**

*Robert C. Ferguson*

\_\_\_\_\_  
Authorized Representative

**TANK OWNERS MUTUAL  
INSURANCE COMPANY**

**NAMED INSURED:** Million Air

**Policy Number:** 16428

**Effective Date:** 02/14/01

**This endorsement modifies insurance provided by POLLUTION LIABILITY  
INSURANCE POLICY. Please read it carefully.**

The following exclusion is added under II. EXCLUSIONS of the POLICY:

- P. Under Coverage A, PROPERTY DAMAGE, any CLAIM for costs of removing, treating, neutralizing, containing or cleaning up a POLLUTANT, including costs incurred in testing for any POLLUTION INCIDENT that may have occurred at the DESIGNATED SITE(S) listed below, prior to 12/23/98:

DESIGNATED SITE

DATE (s)

3036



COMMERCIAL UNION INSURANCE COMPANY  
A Stock Company, Boston, Massachusetts 02108-3100

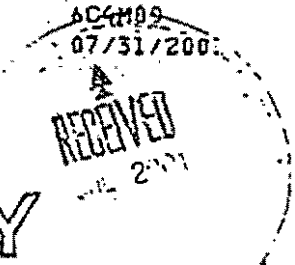
ABC PROGRAM

POLICY NUMBER	ISSUE DATE
CTK311842	07/06/2001

**COMMERCIAL ACCOUNT POLICY  
COMMON POLICY  
DECLARATIONS**

TRANSACTION: RENEWAL

REX NUMBER:



COPY

NAMED INSURED and MAILING ADDRESS:

R. STERN F.B.O. LIMITED  
PARTNERSHIP  
4553 JIMMY DOOLITTLE DRIVE  
ADDISON, TX 75001-5339

BUSINESS: ABC PROGRAM MEMBER

FORM OF BUSINESS: PARTNERSHIP

POLICY PERIOD: From 07/31/2001 to 07/31/2002 at 12:01 A.M. Standard Time at your mailing address.

In return for the payment of the premium, and subject to all terms of this policy, we agree with you to provide the insurance stated in this policy

COVERAGE PARTS and SUPPLEMENTS FORMING A PART OF THIS POLICY	
COVERAGE PARTS and SUPPLEMENTS	PREMIUM*
COMMERCIAL PROPERTY COVERAGE PART	\$2,032.00
COMMERCIAL INLAND MARINE COVERAGE PART	\$3,303.00
<b>TOTAL ANNUAL PREMIUM</b>	<b>\$5,335.00</b>

PREMIUM SHOWN IS PAYABLE: \$5,335.00 AT INCEPTION. JUL 17 2001

\* This premium may be subject to adjustment.

The above numbered policy is completed by the use of these common declarations and the applicable coverage part declarations, together with the common policy conditions, coverage form(s) and forms and endorsements, if any.

NAME and ADDRESS OF AGENT:

COUNTERSIGNED BY:

2471036  
ANDREW N. BAKER & CO  
PO BOX 682  
ST LOUIS, MO 63161-2979

(Authorized Representative)

(Date)



COMMERCIAL UNION INSURANCE COMPANY  
 A Stock Company, Boston, Massachusetts 02108-3100

ABC PROGRAM

POLICY NUMBER	ISSUE DATE
CTK311842	07/06/2001

**COMMERCIAL ACCOUNT POLICY  
 COMMON POLICY  
 DECLARATIONS**

NAMED INSURED  
 R. STERN F.B.O. LIMITED

LOCATIONS			
PREMISES NO.	BUILDING NO.	OCCUPANCY	ADDRESS
00001	001	HANGAR	4553 JIMMY DOOLITTLE DRIVE ADDISON, TX 75001-5339
00001	002	2 FARMS 1/4 TANKS	4553 JIMMY DOOLITTLE DRIVE ADDISON, TX 75001-5339



COMMERCIAL UNION INSURANCE COMPANY

A Stock Company, Boston, Massachusetts 02108-3100

ABC PROGRAM

POLICY NUMBER	ISSUE DATE
CTK311842	07/06/2001

**COMMERCIAL ACCOUNT POLICY  
COMMON POLICY  
DECLARATIONS**

NAMED INSURED  
R. STERN F.B.O. LIMITED

**DECLARATIONS, FORMS and ENDORSEMENTS**

The following is a listing of the declarations, forms, and endorsements which form your complete policy

**INTERLINE FORMS:**

ILMSENDT01	INTERLINE MANUSCRIPT ENDT #1
ILMSENDT02	INTERLINE MANUSCRIPT ENDT #2
G107790588	EXECUTION OF OFFICERS' SIGNATURES
IL09171185	RESIDENT AGENT COUNTERSIGNATURE
IL00171185	COMMON POLICY CONDITIONS
IL02750695	TEXAS CHANGES-CANC & NONRENEWAL
G150810199	EXCL. OF CERTAIN COMPUTER-RELATED LOSSES
G122961099	IMPORTANT NOTICE
IL01710992	TEXAS CHNGS-LOSS PAYMENT

**PROPERTY FORM COVERAGES:**

CPMSENDT01	COMML PROPERTY MANUSCRIPT ENDT #1
CP01421292	TEXAS CHANGES
CP00900788	COMMERCIAL PROPERTY CONDITIONS
CP00101091	BUILDING AND PERSONAL PROPERTY
CP10101091	CAUSES OF LOSS-BASIC FORM
G129720695	COV EXTNSN ENDT
CP00301091	BUSINESS INCOME & EE RENTAL VALUE

**LIABILITY FORM COVERAGES:**

G150761198	POLICYHOLDER NOTICE - YEAR 2000
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**INLAND MARINE FORM COVERAGES:**

IMMSENDT01	COMML INLAND MARINE ENDT #1
G129960895	ETP/EDP-EARTHQUAKE EXCLUSION
G129950895	ETP/EDP-FLOOD EXCLUSION
CM00010790	COMMERCIAL INLAND MARINE CONDITIONS
CM01121090	TEXAS CHANGES
G127900994	DIFFERENCE IN CONDITIONS DECLARATIONS
G127910994	DIFFERENCE IN CONDITIONS COVERAGE FORM
G129821295	EDP DECLARATIONS PAGE
G129860895	EDP POLICY COVERAGE FORM
G129881295	EDP ADDITIONAL COVERAGE ENDORSEMENT

ISO COPYRIGHT, INSURANCE SERVICES OFFICE, INC., 1983, 1984, 1985, 1986, 1987,  
1988, 1989, 1990, 1991, 1992, 1993, 1994.  
COPYRIGHT, COMMERCIAL UNION INSURANCE COMPANY, 1992



COMMERCIAL UNION INSURANCE COMPANY  
 A Stock Company Boston Massachusetts 02108-3100

ABC PROGRAM

POLICY NUMBER	ISSUE DATE
CTK311842	07/06/2001

**COMMERCIAL ACCOUNT POLICY  
 COMMON POLICY  
 DECLARATIONS**

NAMED (INSURED)  
 R. STERN F.B.O. LIMITED

**SPECIAL PROVISIONS**

The following Special Provisions apply to this policy:

IL MS EN DT 01 INTERLINE MANUSCRIPT ENDT #1

IF THE DESCRIPTION OF PROPERTY IN THE DECLARATIONS INCLUDES AIRCRAFT WHILE IN STORAGE, IT IS AGREED THAT SUCH AIRCRAFT IS NOT COVERED IF IT IS OPERABLE UNDER ITS OWN POWER, WHETHER OPERATING OR NOT AT THE TIME OF LOSS.

AIRCRAFT SCHEDULED UNDER THIS POLICY WILL BE VALUED AT ACV IN THE EVENT OF A PARTIAL LOSS AND WILL BE VALUED AT STATED AMOUNT IN THE EVENT OF A TOTAL LOSS.  
 AIRCRAFT THAT IS INCLUDED IN BUSINESS PERSONAL PROPERTY AND NOT SCHEDULED IS EXCLUDED UNDER THIS POLICY.

IL MS EN DT 02 INTERLINE MANUSCRIPT ENDT #2

IT IS AGREED THAT ALL COVERAGE IS EXCLUDED FOR "AIRCRAFT PARTS, ENGINES, AVIONICS, AND ACCESSORIES NOT ATTACHED TO OR FORMING PART OF ANY AIRCRAFT".

CP MS EN DT 01 COMML PROPERTY MANUSCRIPT ENDT #1

IT IS HEREBY AGREED THAT THE FOLLOWING IS ADDED AS AN ADDITIONAL INSURED FOR BUILDING COVERAGE:

ADDISON AIRPORT OF TEXAS, INC.  
 4505 CLAIRE CHENNAULT  
 DALLAS, TX. 75248

IM MS EN DT 01 COMML INLAND MARINE ENDT #1

CUSTOM DIC ENDORSEMENT REPLACES G12790 AND G12791.

## **Fax Cover Sheet**

**DATE:** September 16, 1998

**TO:** Kurt Horn

**PHONE:** 972-248-7733

**FAX:** 972-248-2416

**FROM:** Julie Murphy

**PHONE:** 972-980-2833

**FAX:** 972-991-7345

**RE:** R. Stern F.B.O. – TNRCC Case Closure re LPST No. 110033

**Number of pages including cover sheet:** 3

**Message**



Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

March 14, 2001

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Dallas, Texas 75248

Re: File Review for Closure of Subsurface Release of Hydrocarbons at AATI Fuel Farm, 4788  
Roscoe Turner, Dallas (Dallas County), Texas  
(LPST ID No. 91471 - Facility ID No. 0000022 - Priority 4.1) R-4

Dear Mr. Stuart:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon the submitted information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, we concur with your recommendation that the site has met closure requirements. Therefore, no further corrective action is necessary. The criteria includes, but are not limited to the following:

- groundwater concentrations indicate the contaminant plume is stable and declining;
- groundwater concentrations in all wells (except MW-2) are less than Category II, Plan A target levels;
- concentrations detected in MW-2 appear to be steady or declining;
- soil and groundwater contaminant levels are considered protective for construction workers based on calculated site specific target levels for this site; and
- soil contaminant levels are less than health based soil concentrations.

Please note that financial assurance must be maintained for all operational storage tanks at this site. Please be aware that case closure is based on identified exposure pathways and that any remaining contaminant levels and potential exposure pathways should be evaluated when conducting any future soil excavation or construction activities at this site. Please ensure that any wastes generated from these activities are handled in compliance with all applicable regulations.

Please be advised that all monitor wells which are not now in use and/or will not be used in the next 180 days must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title Title 16, Texas Administrative Code (TAC), Section 76.1004.

Mr. Stuart  
Page 2  
March 14, 2001

A State of Texas Plugging Report (Form No. TNRCC-0055) is required to be submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation, P.O. Box 12157, Capitol Station, Austin, Texas 78711, within thirty (30) days of plugging completion. If you have any questions regarding the future use of an existing monitor well, please contact the Texas Department of Licensing and Regulation at 512/463-7880 or 800/803-9202.

If there are to be any other necessary site restoration activities performed to complete site closure, complete a *Final Site Closure Report* and submit the report to the Texas Natural Resource Conservation Commission (TNRCC) Central Office in Austin to document actual site closure. For sites eligible for reimbursement through the Petroleum Storage Tank Remediation Fund, written preapproval should be obtained prior to initiation of site closure activities. Reimbursement claims for activities that are not preapproved will not be paid until all claims for preapproved work are processed and paid.

Please note that the *Final Site Closure Report*, if necessary, will be the last submittal associated with this case. This letter signifies the completion of corrective action associated with the release. No subsequent TNRCC correspondence will be issued in response to the *Final Site Closure Report*.

Please note that all correspondence must include the LPST and Facility ID Numbers and must be submitted to the TNRCC Central Office in Austin.

Should you have any questions, please contact Curt Champlin of Applied Earth Sciences, Inc (PST Privatization Contractor) at 512/990-7467 ext. 205. Please reference this LPST ID Number when making inquiries. Your cooperation in this matter has been appreciated.

Sincerely,



Dennis Rogers  
TNRCC Onsite Representative  
Petroleum Storage Tank-Responsible Party Remediation Section

DRR/scc  
91471.fnn

# TNRCC FAX TRANSMITTAL

DATE: 3-13-01 NO. OF PAGES (including this sheet): 3

TO: Name MR BRANDON GRIESEL  
 Organization ADDISON AIRPORT  
 Fax Number (972) 248-2416

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
 Name Curt Champlin  
Coordinator-AES, Inc.  
 Telephone 512/990-7467  
 Fax Number 512/239-2216  
 Mail MC-137, PO Box 13087, Austin, TX 78711-3087

NOTES: Response to Corrective Action Proposal(s) for  
 LPST #: 091471 , Facility ID: 000022.  
 If you have any problems receiving this fax, please  
 call 512/990-7467 .

Please note that new Corrective Action Preapproval Forms have been required since September 1, 1995. The forms are available at no cost by downloading from the TNRCC Bulletin Board Services (BBS) (512/239-0700), or over the Internet at <http://www.tnrcc.state.tx.us>. You may also order the forms on diskette from the TNRCC, MC-195, P.O. Box 13088, Austin, TX 78711-3088 (please specify the Corrective Action Preapproval Forms on diskette). A pamphlet with reproducible forms is available at no cost by calling TNRCC Publications at 512/239-0028.

Please note that all LPST corrective action proposals and reports need to be prepared by an environmental contracting/consulting firm registered as a Corrective Action Specialist (CAS) and need to have the the signatures and registration numbers of both the CAS and registered Corrective Action Project Manager (CAPM) included pursuant to Title 30, Texas Administrative Code (TAC), Subchapter J. Any proposal that has been prepared by a consulting firm not registered as a CAS by the Texas Natural Resource Conservation Commission (TNRCC) or which does not include the signature and registration number of the Project Manager may be rejected. Please reserve the use of the telefax machines for submitting proposals and data for LPST cases that rank as new priority 1's and for emergency abatement activities.

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 091471  
12/26/2000 Proposal For: SITE CLOSURE

### GENERAL INFORMATION

LPST-ID	: 091471	Priority: 4.1	
Responsible Party	: ADDISON AIRPORT		Tel: 972/248-7733
Facility # & Name	: 000022 ADDISON AIRPORT		
Facility Address	: 4788 ROSCOE TURNER		
Facility City	: DALLAS	County: DALLAS	
CAPM & Name	: CAPM01366 TODD NICKERSON		
RCAS & Name	: RCAS00127 EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.		


### TNRCC TECHNICAL RESPONSE

Proposed activity is approved as proposed.

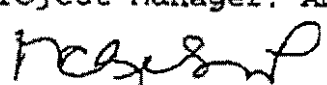
Approval is for the plugging and abandonment of the four monitor wells. Please provide the required documentation upon completion of the project.

### ACTIVITY COST SUMMARY

Proposed Cost:	3,342.00	Maximum Pre-Approved:	3,342.00
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Signature:  Date: 3/09/01 Telephone: 512/990-7467  
 Curt Champlin  
 Coordinator-AES, Inc.

Approval:   
 Jeff Freeman  
 Project Manager, AES, Inc.

  
 Emmanuel Ekpo or Maria Lebron or Dennis Rogers  
 TNRCC On-site Representative  
 Responsible Party Remediation Section

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

## LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 091471

12/26/2000 Proposal For: SITE CLOSURE

Pursuant to 30 TAC Section 334.82 (b), you are required to notify all parties affected by the contamination. If you determine that contamination from the release has migrated off-site, or if you are required by the TNRCC to conduct further assessment or other corrective actions off-site, then you are required to notify the affected landowner(s) within 30 days of documenting the impact. Please note that landowners may include state and local owners of right-of-way properties. For the purpose of this requirement, notice shall be through any means described in 30 TAC Section 334.82 (a). Please provide documentation that the affected landowner(s) has/have been notified within 30 days of notification. Please note that failure to notify affected parties as required herein is grounds for formal enforcement proceedings.

Please note that preapproval of this activity DOES NOT guarantee reimbursement. Eligibility is determined at the time of reimbursement application review. If the release is eligible, the preapproved amount is the maximum allowable for the proposed activities. The actual amount of reimbursement will be determined after the completed reimbursement application and all related receipts and invoices are submitted, and the completed activity is subject to technical and reimbursable cost review. In all instances, the completed work must be technically justifiable and should serve to advance the site in the corrective action process. The amount of preapproved work performed should be based on completion of the activity's objectives. Additionally, please also note that preapproved amounts include all eligible markup.

Claims for reimbursement should only be submitted after the completion of an annual cycle for remediation system operation and maintenance, and quarterly groundwater monitoring unless a more frequent filing period is previously approved by the PST Reimbursement Section. The Reimbursement Section can be reached at 512/239-2001.

Mike

11-19-98

Re Abandoned City Well

The attached is information I have about the old city well. It was drilled 2,778 feet deep in 1957. The screen is 6 $\frac{5}{8}$ " diameter slotted steel. The water is very soft and otherwise acceptable for short term use.

This well could possibly be used as an emergency supply for Y2K, depending on condition. It could possibly supply as much as 0.5 MGD.

If you want to pursue this I would recommend:

1. TV inspection of the well to determine condition. If condition looks OK
2. Clean the well and perform a pump test. This would tell us capacity vs drawdown and we could determine its "21 day" capacity to produce.
3. Probably reinspect the well to be sure our pump test didn't collapse the screen.
4. Fit up the well appropriately for service.

Jim

6-16-98

# Leak - Tee Cap Assessment Report Addison Aviation Services Inc

- p. 6 Potential receptor points should include proposed water line as well as existing w.l.
- p. 8. No Recommended Action proposed - form not filled in.
- p. 11. Levels found <sup>in soils</sup> are below target cleanup goals  
Except TPH - no cleanup goal listed but max TPH found (total petroleum hydrocarbons) 8,600 mg/kg which is high.
- p. 14. Levels found in groundwater reported but no target cleanup levels given. Xylene 28 mg/l & TPH 184 mg/l not significant. No TPH was detected in the monitor wells.
- p. 25. Site priority 4.1 - calls for evaluation to determine the need for additional corrective actions.
- attach 1 - Existing water supply well not shown on site map.
- attach 8 - Contamination exists near proposed water line & exist line.
- attach 15 - Shows soil sample summary - There are soils with significant Ethyl benzene, Xylene & TPH levels.
- JCP Opinion: Report does not address the water mains nearby. All soils with Ethyl Benzene, Xylene & high TPH should be removed.
- JCP.

by Drew Williams, Associate Editor

## As Deadline to Upgrade Looms, UST Owners Dig In

State and federal regulators have no illusions about what is going to happen on Dec. 22, 1998 — the day by which federal law requires owners to upgrade or remove all underground storage tanks (USTs) installed before 1988. They know thousands and thousands of USTs, most containing petroleum, will fall out of compliance when the clock ticks past midnight. "I don't think anybody but the most wild-eyed dreamer would think [otherwise]," said Irv Auerbach of the U.S. Environmental Protection Agency's (EPA) Office of Underground Storage Tanks.

The fines will not be handed down to big firms — the ones that could afford it. They long ago completed the work. The problem will be small operators with one or two tanks, or what most regulators would call "mom and pops." In many cases, these facilities have neither the money nor the inclination to upgrade their USTs. For what it's worth, regulators say they are sympathetic. Sympathetic, but not merciful.

"We're looking at our enforcement policy on that issue right now," said Chuck Head, director of the Division of Underground Storage Tanks at the Tennessee Department of the Environment. "I think what we'll probably do, as a part of our information campaign, is make it really clear that after Dec. 22, 1998, you need to be in compliance. Our goal is, of course, to encourage people to get in compliance, but, you know, folks have had 10 years [to upgrade]. We've done everything that we know how to do to edu-

cate people about this."

Most states have, in fact, gone out of their way to make sure every registered tank owner knows when the ax is going to fall. They've tried direct mail, sent out video tapes, aired public service announcements on television and held town meetings. In Michigan, the state Department of Environmental Quality (DEQ) is leaving no room for misunderstanding, sending personnel to every pre-1988 tank site to hand out information packets.

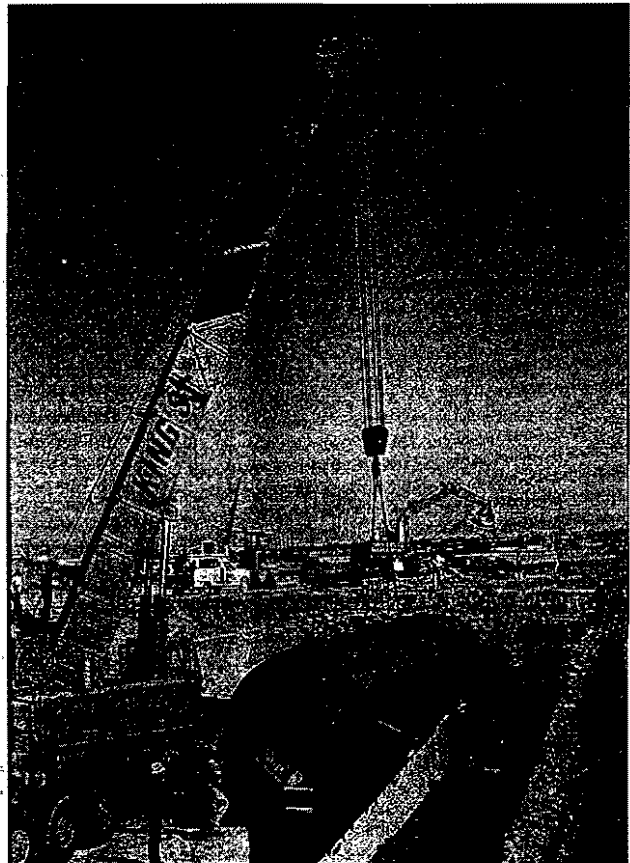
"We sent [the information] to them two years before, but this was to make sure it actually got in their hands and didn't go in the round file," said Art Nash, chief of the Underground Storage Tank Division at Michigan DEQ.

This is what owners presumably should know by now: USTs installed before 1988 must be retrofitted with leak detection, spill, overfill and corrosion protection.

Tanks installed after that date should already have such protection. (See the sidebar for a more detailed explanation of the requirements.)

For whatever reason — expense, defiance, procrastination — the message is not translating into action. Estimates from state regulators indicate that roughly half of affected tanks are not ready for the deadline.

In Tennessee, for example, Head estimates that, of the 21,000 tanks in use, 25 percent are owned by large oil companies who have 100 or more tanks, 30 percent are owned by medium-size companies with 13 to 99 tanks, and 45 percent are "mom and pops" with one to 10 tanks. Of those groups, almost all the large compa-



About half of UST owners are not ready for the Dec. 22 deadline, according to state regulators.

nies are ready for the deadline, as are 75 percent of the medium-size companies. However, almost none of the small firms are ready.

UST manufacturers and installers told *Pollution Engineering* there has been a surge in new tank orders in the last few months as tank owners rush toward the deadline. It may already be too late in some places. "If they haven't scheduled the work by now, they're out of luck," said Michigan DEQ's Nash. "I understand from the major contractors in the state that they are booked already until October 1st."

EPA's Auerbach advises the legions of procrastinators to be cautious, however. "A lot of them are putting in new tanks when they could upgrade their tanks at a fraction of the cost. They have to be wary of salesmen who say, 'The only way to comply here is to spend \$100,000,'" Auerbach said. "The advice I give everyone is: 'Talk to your state program people and find out what is really required.'"

Many UST owners are getting out of the dirt completely and moving to above-ground storage tanks (ASTs). "A lot of people are looking



## SPECIAL REPORT

at it as an escape. A lot of people think it's going to be a less costly alternative," said Wayne Stellmach, a spokesman for the Steel Tank Institute. "Not to say, if you have an AST, you're not responsible for the land, but you don't have to go through the same hoops as you do for the underground tank program."

### UST Requirements

■ **Leak detection.** USTs must employ one or more of the following monthly monitoring methods: interstitial monitoring, automatic tank gauging, soil vapor monitoring, groundwater monitoring, statistical inventory reconciliation, or other methods approved by regulators.

■ **Spill protection.** USTs must have catchment basins installed around the fill pipe.

■ **Overflow protection.** USTs must use automatic shutoff devices, overflow alarms or ball float valves.

■ **Corrosion protection.** The UST's tank and piping must be made of a non-corrodible material, such as fiberglass or steel, with corrosion-resistant coating and cathodic protection. Steel tanks with a layer of non-corrodible material also are acceptable.

Regulators say ASTs are far from a panacea, however. Fire codes and other regulations simply replace those imposed on USTs — and ASTs containing hydrocarbons are prohibited in most urban areas.

So most tank owners will come back to the problem of what to do with their existing USTs when December rolls around. Chuck Head said one of three things will happen when his department calls up a non-compliant tank owner for an inspection. Some of them will submit to the inspection and make the appropriate changes. Some will just disappear. Many will throw in the towel. "The person that owns the tank calls us up and says, 'Oh, by the way, I've just decided to take my tanks out of the ground. I'm not going to operate them anymore,'" Head said. "They've just been waiting for us to call to make that decision to go out of business."

And if tank owners don't go out of business voluntarily, regulators will help them. Nash said the preferable enforcement option against recalcitrant violators is to cut off supply and let economics work its magic. The Michigan DEQ will put red plastic tags on the fill pipes of illegal USTs to prohibit suppliers from off-loading product. Of course, criminal and civil penalties are

always an option, too.

The methods may seem harsh, but Nash insists tough enforcement is the only fair way to handle the requirements. "From talking to the regulated community in the state ... pretty much the conscientious members are ready for the deadline," said Nash. "Their attitude is: 'Enforce the deadline. We went out and we spent the money. We made the capital investment. It's not fair to not enforce it now, because they [non-compliant companies] would have an unfair economic advantage over us.'"

For more information about the UST deadline, contact the EPA hotline at 800-424-9346, or access the EPA UST web site at <http://www.epa.gov/swerust1/>.

#### Reader Interest Review

Please circle the appropriate number on the Reader Service Card to indicate the level of interest in the article.

High 197      Medium 198      Low 199

For information regarding the *Pollution Engineering* Library, please call (847) 390-2777.

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John:

4-17-98

Ken Hartline Telecon

Assuming liability:

TNRCC will issue letters  
will go to owner/operator

We may <sup>not want to</sup> get a copy —

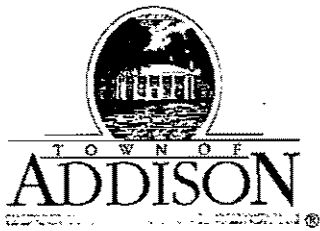
Owner of the TANKS

(get cc from AATI)

Sam: TX Pro Air — assumed  
responsibility & cleaned it all  
up — why did they do it?

Water Well Closure <sup>being</sup>  
Hold off — well there  
will cause much more  
Stringent clean-up

Well will prob be sampled and that  
will be expensive — let Cherry Air  
pay for it.



**PUBLIC WORKS DEPARTMENT**

Post Office Box 144 Addison, Texas 75001

(972) 450-2871

16801 Westgrove

April 7, 1998

Mr. Hardy Thompson  
Cowles & Thompson  
901 Main Street, Suite 4000  
Dallas, Texas 75202

Re: Addison Airport Fueling Issues

Dear Hardy:

Please find attached the following documents attached for your review:

- 1 Agreement for Operation of the Addison Airport Between the City of Addison, Texas and Addison Airport, Inc., dated December 30, 1976
- 2 First Amendment to the Agreement for Operation of the Addison Airport, dated August 8, 1978
- 3 Agreement of Amendment to the Agreement for the Operation of Addison Airport Between the City of Addison, Texas, and Addison Airport, Inc., dated May 24, 1979
- 4 Extension of Term of Agreement of Amendment to the Agreement for the Operation of Addison Airport Between the City of Addison, Texas, and Addison Airport, Inc., dated January 13, 1981
- 5 Meeting Minutes Operations Agreement Between the City of Addison and Addison Airport of Texas, Inc., dated October 30, 1984
- 6 Agreement, dated April 6, 1985.
- 7 Agreement of Specification and Amendment to the "Agreement for Operation of the Addison Airport Between the City of Addison, Texas, and Addison Airport, Inc.", dated May 4, 1990
- 8 Amendment to the Agreement of Specification and Amendment to the "Agreement for Operation of Addison Airport Between the City of Addison, Texas, and Addison Airport, Inc.", dated October 1, 1990
- 9 Ground Lease, dated June 23, 1983
- 10 Exhibit "A" Addison Airport Public Aircraft Fuels Dispensing Permit, dated April 9, 1991
- 11 Exhibit "B" Addison Airport Nonpublic Aircraft Fuels Dispensing Permit.
- 12 Exhibit "C" Ordinance Number 091-060, "Public Aircraft Fuels Dispensing Permit – Self Service", dated October 22, 1991
- 13 Exhibit "D" Addison Airport Nonpublic Aircraft Fuels Dispensing Permit – STC Certified. Not dated.

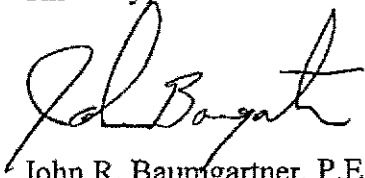
Mr. Hardy Thompson  
Page Two  
April 7, 1998

- 14 Public Aircraft Fuels Dispensing Permit Department Responsibilities.
- 15 Non-public Aircraft Fuels Dispensing Permit Department Responsibilities.
- 16 Self Service Aircraft Fuels Dispensing Permit Department Responsibilities.

While we have some rights to manage the fuelers through the fuel permits it does not appear that we agreed to assume any of AATI's responsibilities under the "Agreement for Operation of the Addison Airport" as amended.

Please prepare a written opinion on the responsibility of AATI with regard to the fueling activities at the airport prior to the next meeting scheduled for May 13, 1998.

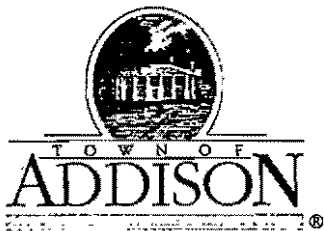
Sincerely,



John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel, without attachments  
Chris Terry, without attachments  
Ron Whitehead, without attachments

cc: Chris Terry  
Jim Pierce  
Mike Murphy



**PUBLIC WORKS DEPARTMENT**

(972) 450-2871

Post Office Box 144 Addison, Texas 75001

16801 Westgrove

March 19, 1998

Certified Mail No. P 108 409 953

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

Re: Addison Airport NPDES Permit

Dear Sam:

The Town of Addison recently had Camp Dresser and McKee complete a phase I environmental assessment of Addison Airport. A copy of the report was given to Brandon Greisel on February 25, 1998 for AATI's use.

One of the issues identified in the report was the fact that Addison Airport's National Pollution Discharge Elimination System (NPDES) permit has lapsed. In accordance with our operating agreement, AATI is responsible for complying with all applicable laws.

The Town of Addison respectfully requests that AATI acquire an NPDES permit in compliance with all applicable state and federal requirements and provide the Town with a copy of the permit.

This letter is your formal notice as required under "Section 21 - Applicable Governmental Requirements" and "Section 29 - Events of Default and Remedies" of the "Agreement for Operation of the Addison Airport between the city of Addison, Texas and Addison Airport, Inc."

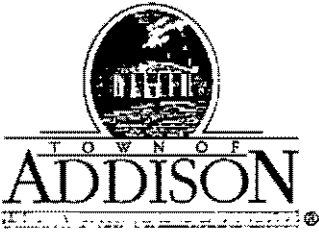
I am aware that you and your staff are working on this and trust that this issue will be resolved within the next 30 days. Please call me at 972/450-2871 if you have any questions or need additional information.

Sincerely,

John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel  
Ron Whitehead

cc: Chris Terry  
Jim Peice  
Mike Murphy



**PUBLIC WORKS DEPARTMENT**

(972) 450-2871

Post Office Box 144 Addison, Texas 75001

16801 Westgrove

March 19, 1998

Certified Mail No. P 108 409 956

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

Re: Addison Airport Phase I Environmental Assessment

Dear Sam:

The Town of Addison recently had Camp Dresser and McKee (CDM) complete a phase I environmental assessment of Addison Airport. A copy of this study was delivered to Brandon Greisel with AATI on February 25, 1998.

I know you are as concerned as we are regarding environmental compliance with applicable local, state and federal requirements. The Town respectfully requests that AATI develop an action plan to address all of the issues identified in the CDM report. This plan should have a stated goal for remediation/education, a schedule, and estimated cost associated with each issue identified by CDM.

With the exception of the NPDES permit which is addressed in separate correspondence, the Town request that this project be completed within 60 days from the receipt of this notice. Upon completion of your action plan to bring the airport into compliance with applicable environmental standards and to abate any nuisances, the Town will have your plan reviewed by an appropriate environmental professional.

This letter is your formal notice as required under "Section 4 - Upkeep of third Party Areas and Jet Port" of the "Agreement of Specification and Amendment to the Agreement for Operation of the Addison Airport between the City of Addison, Texas, and Addison Airport, Inc.," and "Section 9. Standards of Operation," "Section 16. Alteration, Construction by Company for Airport Purposes," "Section 21. Applicable Governmental Requirements," "Section 23. Federal Airport Aid," and "Section 29. Events of Default and Remedies of the "Agreement for Operation of the Addison Airport between the City of Addison, Texas and Addison Airport Inc."

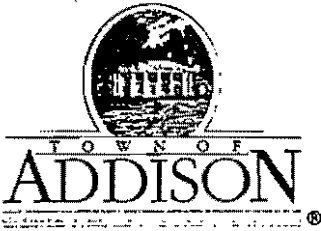
I trust we can work together to get these issues resolved quickly. Please call me at 450-2871 if you have any questions or need additional information.

Sincerely,

John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel  
Ron Whitehead

cc: Chris Terry  
Jim Pierce  
Mike Murphy



**PUBLIC WORKS DEPARTMENT**

(972) 450-2871

Post Office Box 144 Addison, Texas 75001

16801 Westgrove

March 17, 1998

Certified Mail No. P 108 409 955

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

Re: Fuel Contamination

Dear Sam:

On January 28, 1998 we sent you a letter regarding the existence of fuel products around the Cherry Air fuel farm. Attached is a copy of the correspondence we have received from Cherry Air's consultant.

On Friday, March 13, 1998 there was another report of free fuel product on the ground just west of the Cherry Air fuel facility. This appears to be a continuation of the same problem and we are concerned about the amount of time that has passed since our first request.

I know you are as concerned as we are regarding the potential impact to the surrounding environment from fuel contamination. We respectfully request that this fueling problem be cleaned up as soon as possible and that the appropriate steps are taken to minimize the reoccurrence of any fuel contamination.

We suggest the following action:

- 1 Removing the fuel contaminated soil near the water line.
- 2 Remove the source of contamination.
- 3 Immediate clean up of all fuel spilled on the surface.
- 4 Report the spill to the Texas Natural Resource Conservation Commission (TNRCC).
- 5 Contract with a qualified environmental consultant to prepare an assessment of the horizontal and vertical extent of contamination at the site in accordance with TNRCC rules and regulations. The assessment should include whether ground water has been affected. Prepare and implement a corrective action plan if required by TNRCC.
- 6 Furnish documentation that all technical deadlines required by Texas Administrative Code (TAC) Chapter 334, pertaining to leak detection and overflow protection, have been met.
- 7 Furnish the Addison Department of Public Works with a copy of all reports and correspondence regarding this matter.

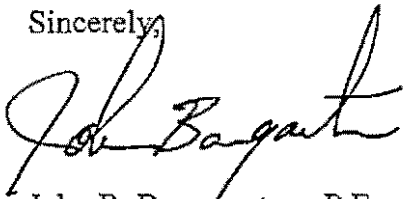
Mr. Sam Stuart  
March 17, 1998  
Page Two

- 8 Provide evidence that the fuel farm will conform to the December 1998 petroleum storage tank upgrades mandated by the TNRCC/EPA.

This letter is your formal notice as required under "Section 4 - Upkeep of third Party Areas and Jet Port" of the "Agreement of Specification and Amendment to the Agreement for Operation of the Addison Airport between the City of Addison, Texas, and Addison Airport, Inc.," and "Section 9. Standards of Operation," "Section 16. Alteration, Construction by Company for Airport Purposes," "Section 21. Applicable Governmental Requirements," "Section 23. Federal Airport Aid," and "Section 29. Events of Default and Remedies of the "Agreement for Operation of the Addison Airport between the City of Addison, Texas and Addison Airport Inc."

I trust we can work together to get this issue resolved quickly. Please call me at 450-2871 if you have any questions or need additional information.

Sincerely,



John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel  
Ron Whitehead

Attachment:

Environmental Documentation provided by Leak-Tec Corporation (22 pages)



John ✓  
Chris ✓  
Ron Hartline of CDM  
Sent me a copy of  
this report - FYI  
Jim  
2-17-98

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
PETROLEUM STORAGE TANK DIVISION  
ASSESSMENT REPORT FORM

Addison Airport Fuel Farm  
Addison Road and Roscoe Turner  
Dallas, Texas 75248  
LPST: 91471

Registered Corrective Action Specialist  
Triad Onsite Systems, Inc.  
2435 Southwell, Suite 1  
P.O. Box 59185  
Dallas, Texas 75229-1185  
(972) 241-7400  
RCAS 00328

June 1997

consulting  
engineering  
construction  
operations

# TRANSMITTAL SHEET

Date 2/16/98

Job Addison Airport Phase I ESA

To Mr. Jim Pierce, P.E.

Town of Addison

Att. \_\_\_\_\_


we are sending

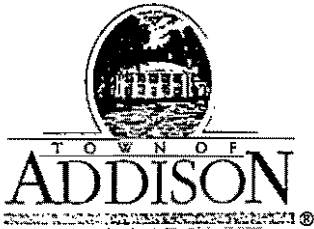
- herewith .....
- under separate cover .....
- by messenger .....

1 print(s) each of the following TNRCC Assessment Report Form for the AATI fuel farm. If you have any questions, please give me a call.

which are

- approved .....
- approved as noted .....
- returned to you for correction/resubmittal .....
- for your information .....
- .....

By 



**PUBLIC WORKS DEPARTMENT**

Post Office Box 144 Addison, Texas 75001

Copies - Kurt - fax Eh. Wallingford  
Mike Murphy  
Jim Pierce  
Hardy Thompson  
Jeff Markiewicz  
Gordon Robbins  
(972) 450-2871

16801 Westgrove

January 28, 1998

Certified Mail No. P 108 409 796

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

Re: Fuel Contamination

Dear Sam:

During the replacement of the cross airport water line we became aware that there may be a significant fuel issue along the south side of the Cherry Air fuel farm and the south end of the 300, 400 and 500 series t-hangars.

During the installation of the water line, we observed free fuel product seeping from the ground into the utility trench. On Monday, January 19, 1998, we saw fuel in several areas on the surface of the ground on the Cherry Air fuel farm and the tract immediately west of the site. Kurt Horn and Zane Ryan were notified and clean-up has started.

We are particularly concerned because the petroleum product can adversely impact the water line and even migrate down the water line bedding, negatively affecting the watershed.

I know you are as concerned as we are regarding the potential impact to the surrounding environment from fuel contamination. We respectfully request that this problem, and any other fuel farm contamination be cleaned up as soon as possible.

We suggest the following action:

1. Removing the fuel contaminated soil near the water line.
2. Remove the source of contamination.
3. Immediate clean-up of all fuel spilled on the surface.
4. Report the spill to the Texas Natural Resource Conservation Commission (TNRCC).
5. Contract with a qualified environmental consultant to prepare an assessment of the horizontal and vertical extent of contamination at the site in accordance with TNRCC rules and regulations. The assessment should include whether ground water has been affected. Prepare and implement a corrective action plan if required by TNRCC.

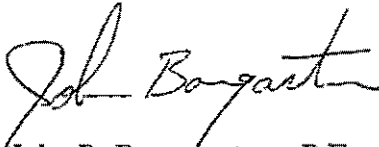
Mr. Sam Stuart  
January 28, 1998  
Page Two

6. Furnish documentation that all technical deadlines required by Texas Administrative Code (TAC) Chapter 334, pertaining to leak detection and overfill protection, have been met.
7. Furnish the Addison Department of Public Works with a copy of all reports and correspondence regarding this matter.
8. Provide evidence that the fuel farms will conform to the December 1998 petroleum storage tank upgrades, mandated by the TNRCC/EPA.

This letter is your formal notice as required under "Section 4 - Upkeep of third Party Areas and Jet Port" of the "Agreement of Specification and Amendment to the Agreement for Operation of the Addison Airport between the City of Addison, Texas, and Addison Airport, Inc.," and "Section 9. Standards of Operation," "Section 16. Alteration, Construction by Company for Airport Purposes," "Section 21. Applicable Governmental Requirements," "Section 23. Federal Airport Aid," and "Section 29. Events of Default and Remedies of the "Agreement for Operation of the Addison Airport between the City of Addison, Texas and Addison Airport Inc."

I trust we can work together to get this issue resolved quickly. Please call me at 450-2871 if you have any questions or need additional information.

Sincerely,



John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel  
Ron Whitehead

# Cherry Air Fuel Spill

1-19-98

Actions that shall be taken:

1. Immediate clean-up of all fuel spilled ~~on~~ on the surface.
2. Report the spill to the Texas Natural Resource Conservation Commission (TNRCC)
3. Hire a qualified environmental consultant to prepare an assessment of the horizontal and vertical extent of contamination at the site in accordance with TNRCC rules and regulations. The assessment should include whether ground water has been affected. Prepare a corrective Action Plan if required by TNRCC.
4. →
5. ~~4~~ Furnish the Department of Public Works with a copy of all reports and correspondence regarding this matter.

4. Furnish documentation that all technical deadlines required by Texas Administrative Code (TAC) Chapter 334, pertaining to leak detection and overflow protection, have been met.

Telecom / Mike Bowles

1-19-98

1-800-832-8224 N

Report Spills

1-512-239-2507

1. Clean up puddles & absorb
2. Report the spill, 25 gallons
3. Fire Hazard -
4. Emergency Response firm  
Env consultant to  
look @
5. Satisfy TNKCC Stds/Regs -  
Delineate Hor & Vertical  
extent
6. Assess the Site -

Compliance  
Spill prevention  
overall exposure  
for other

Kerns

Report —  
from Neil:

1-16-98

Triad Onsite Systems has been hired  
by AATI

972-241-7400

Marisa Basso

Consultant

Contractor - Chuck Berry @

Same #



Addison Airport  
Fuel Farm

2-16-98

Telcom with Kurt Horn

AATI has done a survey of extent of contamination ~~from~~ the fuel farm area, with report. Ron Haultlini has the report. Environmental Innovation is their consultant.

There is no remediation plan as yet. AATI would like a copy of our Draft Phase I report. Moving the fuel farm would affect remediation approach.

Kurt has heard we are going to do a Phase II.

There is no sense ~~down~~ doing remediation w/o a facility to prevent further spills. Another spill would trash the area again.

Environmentalists are looking over AATI's shoulder. AATI would not release any info from the report and will put that in writing.

Jes.

**RELEASE DETERMINATION REPORT FORM**

Owners and operators must report releases by phone to the appropriate TNRCC Region Office within 24 hours of confirmation. The owner and operator should use this form to comply with the reporting requirements in Title 30, Texas Administrative Code §334.77(b). Submit the completed form within 20 days after release confirmation. EXCEPT IN EMERGENCIES, THE TNRCC WILL INITIATE ACTION ON THIS CASE ONLY WHEN THE COMPLETED FORM (pages 6 through 15) IS SUBMITTED WITH ATTACHMENTS TO BOTH THE APPROPRIATE TNRCC REGIONAL OFFICE AND TO THE CENTRAL OFFICE IN AUSTIN (PST Division, MC 137, P.O. Box 13087, Austin, Texas 78711). DO NOT MODIFY THIS FORM IN ANY WAY. Complete all applicable blanks. Incomplete forms will be returned without review. All proposals for the next appropriate corrective action activity must be submitted by a CAS and PM in the format outlined in the guidance document entitled *Preapproval for Corrective Action Activities* (RG-111).

**SUMMARY**

Based on the information obtained during this release determination and by comparing the contaminant levels to the stated action levels, check one of these four items as appropriate:

- This was a suspected release. No contamination was detected due to this suspected release.
- This site is an LPST site. Contaminant levels exceed action levels (or one of the other criteria applies).
- This site is not an LPST site. Contaminant levels do not exceed action levels (and none of the other criteria applies).
- This site is not an LPST site. No contamination was detected (and none of the other criteria applies).

IF THIS SITE IS AN LPST SITE, COMPLETE THE REMAINDER OF THIS FORM (except Section B). If this site is not an LPST site, stop here and complete Sections A, C, and G (and Section B if applicable) of the attached form.

- Check here if this site is an existing LPST case and this Release Determination Report is being submitted only as the tank removal-from-service documentation.

Answer the following questions in this Summary Section if this is an LPST case and if the CAS and PM sign the form in Section G. This section is to be completed by a CAS and PM only. If the form is completed by someone other than a CAS and PM, leave the rest of this Summary Section blank and go to Section A.

Is this case eligible for reimbursement of necessary corrective actions?  YES  NO If not, appropriate corrective action in accordance with applicable rules and guidance may continue without specific direction or approval from the PST Division, however, coordination with the PST Division is recommended. If the site is eligible for reimbursement, all corrective action activities, with the exception of NAPL recovery and emergency abatement activities, must be preapproved prior to initiation.

The next appropriate step for this site, if it is an LPST site, is (check one only):

- Case closure** If checked, attach *Site Closure Request Form* (TNRCC-0028). Please be sure the site meets all requirements for closure prior to submitting the *Site Closure Request Form*. Are there costs associated with case closure?  YES  NO If YES, and if the site is eligible for reimbursement, attach a cost proposal and workplan with the *Site Closure Request Form*.
- Risk-Based Assessment** The risk-based assessment is needed only when the existing assessment data is not an adequate basis for site closure. Please critically evaluate the need for additional assessment before selecting this option. Refer to pamphlet RG-175 for guidance on conducting the risk-based assessment. Attach a detailed workplan and proposal if the site is eligible for reimbursement. A proposal must be submitted with this form if the RP is financially able to undertake necessary corrective actions.
- Corrective action other than risk-based assessment** Attach a detailed workplan and proposal if the site is eligible for reimbursement and the RP is financially able to undertake necessary corrective actions.

Is the responsible party financially able to complete the next appropriate step?  YES  NO If Yes, attach proposal as specified above. If No, contact the PST Division at 512/239-2200 to request information on the State-Lead option. Financial ability determination forms must be completed and submitted to document that the RP is financially unable to continue necessary corrective actions.

**A. GENERAL INFORMATION**

LPST ID No.: 112934  
(if known)

TNRCC Region: 04

Priority: 4.1  
(see pages 13-15)

Facility ID No.: 0050235 Required unless one of the following applies:

- Check here if tank registration is not required for this site (per 30 TAC §334.7), and check one of the following as applicable:
- the tank(s) are partially excluded or exempted from jurisdiction under 30 TAC Chapter 334. Specify type or usage of tank(s): \_\_\_\_\_
  - these tanks were permanently removed from the ground before May 8, 1986 (provide date of removal \_\_\_\_\_);
  - these tanks remained in the ground but were emptied, cleaned, and filled with inert substance before January 1, 1974 (provide date of activities: \_\_\_\_\_);
  - these tanks were out of operation, their existence was unknown, and they were permanently removed from service within 60 days of their discovery (provide date of discovery: \_\_\_\_\_). Provide method of discovery: \_\_\_\_\_

Prior to this investigation, was this site ever an LPST site?  YES or  NO If yes, provide LPST ID number: \_\_\_\_\_

Tank Owner: Addison Aviation / Cherrv Air

Tank Owner Mailing Address: 4584 Claire Chennault

Tank Owner City: Addison State: TX Zip: 75248

Tank Owner Contact Person: Mr. Doug Boddie Phone: 972/380-0737 Fax no.: 972/380-0046

Tank Operator (if different from tank owner): \_\_\_\_\_

Tank Operator Mailing Address: \_\_\_\_\_

Tank Operator City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Tank Operator Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax no.: \_\_\_\_\_

Land Owner (if different from tank owner and operator): Town of Addison

Land Owner Mailing Address: P.O. Box 9010

Land Owner City: Addison State: TX Zip: 75001

Land Owner Contact Person: John Baumgartner Phone: 972/450-2886 Fax no.: \_\_\_\_\_

If this site is an LPST site, which of these parties will oversee the corrective actions at this site?

Tank Owner  Tank Operator  Land Owner

Other (not the contractor or consultant): Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ Contact person: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

A representative of the party overseeing the corrective action must sign this form in Section G. Please note that no matter which party conducts corrective action, the tank owner and the tank operator are jointly responsible for the necessary corrective actions.

Facility Name: Cherrv Air Fuel Farm

Facility Physical Address: 15405 Addison Rd.

Facility City: Addison County: Dallas County Code (see p. 16): 057

INDICATE TYPE OF RELEASE: (check one)  Suspected  Confirmed but below action levels (not an LPST site)

Confirmed and above action levels (LPST site)  No evidence of contamination (all results below detection limits)

Please refer to flowchart and Title 30 Texas Administrative Code, §334.71 - 334.77 for descriptions and procedures for suspected and confirmed releases.

**A. GENERAL INFORMATION**

Were copies of this COMPLETED form (excluding pages 1 through 5) and appropriate attachments, including a proposal (if RP is financially able), sent to both the TNRCC Central Office and to the Region Office?  YES  NO (IF COPIES ARE NOT SENT TO BOTH OFFICES, THIS DOCUMENT WILL BE RETURNED WITHOUT REVIEW).

Indicate number of tanks currently and formerly located at this site (attach pages as necessary):

	Type (UST/AST)	Product Type	Size (approx. gal)	
Current:	UST	JP 4	12,000	
	UST	JP 4	12,000	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
Former:	_____	_____	_____	<u>Date Removed from Service</u>
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	

**B. SUSPECTED RELEASE INFORMATION**

Complete only this section and sections E through G as appropriate when the situation of a suspected release has occurred and it was documented that a release had not occurred.

Date suspected release discovered: \_\_\_\_\_ Reason release suspected: \_\_\_\_\_

Date suspected release reported to TNRCC: \_\_\_\_\_ Reported to: \_\_\_\_\_

Possible source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown  
 Other: \_\_\_\_\_

Type of substance(s) suspected released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline  
 Jet Fuel (type: \_\_\_\_\_)  Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)  
 Other: (be specific) \_\_\_\_\_

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that all tanks and piping were tight?  YES or  NO (check one) If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs: \_\_\_\_\_

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any soil confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  
 YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, and laboratory results.

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results.  
 (Groundwater sampling is not required at this point unless there is reasonable suspicion of impact.)

**C ONFIRMED RELEASE INFORMATION**  
Complete this section only if a release was confirmed.

Date release confirmed: 1/28/98 Date release reported to TNRCC: 1/28/98 Reported to: Lonnie Gilley/Region 4

Is this the first release from a UST or AST discovered at this site?  YES  NO

Is there any other contamination or potential impacts to human health from any source other than the tank systems at this site?  
 YES  NO If yes, indicate type and location of contamination: \_\_\_\_\_

Reported to TNRCC by: Site Visit by Lonnie Gilley Representing: TNRCC - Region 4

Method of release discovery:

- Samples collected during tank removal-from-service activities  Impact to utility line  
 Samples collected during other tank system construction activities  Impact to surface water  
 Samples collected during release determination investigation  Impact to water well  
 Other: See attached LPST Case Incident Report

Method of release confirmation: (check all that apply)

Soil samples  Groundwater samples  Surface water samples  Documentation of presence of NAPL

Source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown  
 Other: \_\_\_\_\_

Substance(s) released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline

Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)

Jet Fuel (type: JP-4)  Other: (be specific) \_\_\_\_\_

Amount of product released: \_\_\_\_\_ Chemical Abstract Service registry #: \_\_\_\_\_ (for hazardous substances)

Were any soil confirmation samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods and laboratory results.

Type of native soil: (check one)  Clay or silt  Sand, gravel or rock

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results.

Known Impact(s): (check all that apply)  Soil  GW  Surface Water  Subsurface Utilities - type: \_\_\_\_\_

Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was the land owner (if different from the tank owner) notified of the contamination?  YES or  NO (check one) If Yes, attach copy of the letter which provided the notification. If No, documentation that notification was provided must be submitted within 30 days from the date the impact is discovered.

Possibly Threatened: (check all that apply)  GW  Surface Water  Subsurface Utilities - type: Water line

Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was NAPL detected (greater than 0.01 feet)?  YES or  NO (check one) If yes, describe how and where it was detected, the thickness detected, and the recovery actions taken: Free product >0.01 feet observed in excavation approximately 75' southwest of source

installed by utility crews. Depth approximately 1/4". RP is removing product.

**D. ABATEMENT MEASURES**

Were abatement measures initiated to stop the release or to recover the released substance?  YES or  NO (check one) If yes, describe the abatement and/or recovery measures taken and the dates and duration of the activities: RP has started product recovery.

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test results.  
Did the tests indicate that all tanks and piping were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight:

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs:

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test results. N/A  
Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight:

**E. FIRE/OTHER OFFICIALS**

Were any other officials notified?  YES  NO (check one) If Yes, indicate:

Name	Representing	Phone number	Date(s) Notified
<u>Bob Wallingford</u>	<u>Addison Fire Dept.</u>	<u>972/450-7203</u>	<u>1/28/98</u>
<u>John Baumgartner</u>	<u>Addison Public Works</u>	<u>972/450-2886</u>	<u>1/28/98</u>
<u>Sam Stuart</u>	<u>Addison Airport</u>	<u>972/248-7733</u>	<u>1/28/98</u>

Were any directives issued by the fire or other officials?  YES  NO If Yes, describe directives and actions taken in response to the directive: Removal of free product (ongoing) and assessment of extent of contamination

**F. WASTE DISPOSITION**

Indicate the status of all wastes and other materials generated:

Type of waste (soil, water, product)	Quantity	Current location	Method and location of disposal or treatment
<u>Product</u>	<u>Unknown at</u>	<u>RP Site</u>	<u>To be disposed of by RP</u>
	<u>this time</u>		

G. REPORT PREPARATION

A Licensed On-Site Supervisor may complete and sign this form when the supervisor is acting in an approved capacity for tank removal-from-service or tank system repair activities.

Licensed On-Site Supervisor: James Taylor ILP Reg. No.: 000670 Exp. Date: 1/23/99

Company: Leak-Tec Corporation

Telephone No.: 817/572-0347 FAX No.: 817/478-9871

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TNRCC published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature: [Handwritten Signature] Date: 2-24-98

OR

Project Manager: PM Reg. No.: Exp. Date:

Company:

Telephone No.: FAX No.:

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TNRCC published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

PM Signature: Date:

AND

CAS Representative: CAS Reg No.: Exp. Date:

Company:

Telephone No.: FAX No.:

By my signature affixed below, I certify that I am the duly authorized representative of the Correction Action Specialist named and that I have personally reviewed the site investigation results and other relevant information presented herein and considered them to be in accordance with accepted standards/practices and in compliance with the applicable TNRCC published rules, guidelines and the laws of the State of Texas. Further, that the information presented herein is considered complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature of CAS Representative: Date:

If the CAS or On-Site Supervisor does not complete and sign this form, provide the following information on the person who has prepared the form:

Name: Company:

Telephone No.: FAX No.:

Signature: Date:

Name of Tank Owner or Operator contact:

Telephone No.: FAX No.:

By my signature affixed below, I certify that I have reviewed this report for accuracy and completeness of information regarding points of contact and the facility and storage tank system history and status. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report related to the contact information, and the facility and storage tank system history and status information, I may be subject to administrative, civil, and/or criminal penalties. I attest that I have reviewed this report for accuracy and completeness. I understand that I am responsible for addressing this matter.

Signature: [Handwritten Signature] Date: 3-2-98

## PRIORITY CASE PRIORITIZATION

The actions listed for each priority serve as a guide to assist the tank owner and operator in determining appropriate actions based on site conditions. Preapproval for corrective action activities should be obtained for sites eligible for reimbursement. Please refer to the applicable rules in Title 30, Texas Administrative Code, §§334.72-334.81 and other TNRCC guidance for more detailed information.

### PRIORITY 1 SITES

Is NAPL (free product) present?  yes  no Utilize all known information on site soils, vapors, groundwater, surface water, and other impacts and mark all boxes which match site conditions. The lowest value is the site priority. If the answers to any statements are unknown, additional assessment, usually in the form of a Risk-Based Assessment (RBA), should be completed.

PRIORITY	ACTIONS
<input type="checkbox"/> 1.1 Explosive levels, or concentrations of vapors that could cause acute health effects are present in a residence or other building. (If yes, ensure the local fire authority or State Fire Marshal (512/918-7100) and the local TNRCC Region Office have been notified.)	Emergency Actions: Notify appropriate authorities, property owners, and potentially affected parties. Mitigate vapor impact. Additional Actions: Conduct receptor survey. Conduct assessment of contaminant plumes. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.2 An active public water supply well, public water supply line, or public surface water intake is impacted or immediately threatened by the release. (If yes, ensure the public authority and the local TNRCC Region Office have been notified.)	Emergency Actions: Notify appropriate authorities, well users, and property owners. Prevent further migration. Mitigate impact. Discontinue use of water supply. Additional Actions: Provide alternative water source*. Conduct receptor survey. Conduct assessment of contaminant plumes in relation to water supply impact. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.3 A sole-source domestic water supply well or line, or sole-source domestic surface water intake is impacted or immediately threatened by the release. (Ensure the well user or surface water user and the local TNRCC Region Office have been notified.)	Emergency Actions: Notify appropriate authorities, well users, and property owners. Prevent further migration. Mitigate impact. Discontinue use of water supply. Additional Actions: Provide alternative water source*. Conduct receptor survey. Conduct assessment of contaminant plumes in relation to water supply impact. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.4 Explosive vapors are present in a subsurface utility system, but no building or residence is impacted. (Ensure the utility authority and the local TNRCC Region Office have been notified.)	Emergency Actions: Notify appropriate authorities, property owners, and affected parties. Mitigate vapor impact. Additional Actions: Conduct receptor survey. Conduct assessment of contaminant plumes. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.5 NAPL is present at the ground surface, on surface water bodies, surface water runoff, or in utilities other than water supply lines. (Ensure the utility authority is notified if utilities are affected. Ensure free product removal actions are implemented as required pursuant to 30 TAC 334.79.)	Emergency Actions: Notify appropriate authorities, property owners, and affected parties. Secure area. Additional Actions: Conduct free product removal activities. Prevent migration of free product. Conduct assessment in relation to impact. Conduct receptor survey. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.6 The Edwards aquifer, recharge zone or transition zone is impacted.	Emergency Actions: Recover free product if present. Additional Actions: Initiate assessment activities. Conduct assessment in relation to impact. Conduct receptor survey. Determine target cleanup levels. Conduct remediation as necessary. Determine if free product is present and, if so, conduct free product removal activities.
<input type="checkbox"/> 1.7 Ambient outdoor vapor/particulate concentrations exceed concentrations of concern from an acute exposure, or safety viewpoint.	Emergency Actions: Notify appropriate authorities, property owners, and affected parties. Mitigate immediate impacts. Additional Actions: Conduct sufficient assessment to determine exposure pathways, receptor types and locations, and target cleanup goals. Determine if free product is present and, if so, conduct free product removal activities.

\*Reimbursement for provision of alternative water supply is contingent upon 30 TAC 334.308 (c)(3).



**PRIORITY 2 SITES**

	PRIORITY	ACTIONS
<input type="checkbox"/> 2.1	Soils or water contaminated by the release are exposed and unsecured from public access and dwellings, playgrounds, parks, day care centers, schools, or similar use facilities are located within 500 feet of those soils.	Remove, cover, or otherwise secure exposed soils or water. Fill open excavations. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.2	A former vapor impact is associated with this site, or free product is present in close proximity to subsurface utilities or other natural or man-made conduit and there is potential for the accumulation of explosive vapors or vapors that could cause acute effects in a building or other structure.	Remediate/remove vapors, free product, or contaminated soils. Determine migration pathways and remove/prevent migration pathways. Conduct assessment of contaminant plumes in relation to the potential vapor pathway. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.3	A domestic water supply well or line, or a domestic surface water intake is impacted or immediately threatened by the release, but the user has access to another public or private water supply. (Ensure the user and the local TNRCC Region Office have been notified.)	Notify proper authorities, users, and property owners. Prevent migration to water intake. Provide alternative water supply if necessary. Conduct assessment to identify contaminant plumes and exposure pathways in relation to water intake. Determine appropriate target cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.4	A non-public or non-domestic water supply well is impacted or immediately threatened. (Do not consider monitor wells.) (Ensure the user and the local TNRCC Region Office have been notified.)	Notify proper authorities, well users, and property owners. Prevent migration to water well. Provide alternative water supply if necessary. Plug water well if necessary. Conduct assessment to identify contaminant plumes and exposure pathways in relation to water well. Determine appropriate target cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.5 <sup>1</sup>	Groundwater is impacted and a public or domestic water supply well is located within 0.25 miles of the UST/AST system or source area. (Answer yes if a well is present, but the well use is unknown). (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Evaluate well impact potential. Determine appropriate cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.6	Groundwater or storm water runoff is impacted and discharges within 500 feet of the known extent of contamination to a surface water body used for human drinking water, contact recreation, habitat to a protected or listed endangered plant and animal species.	Conduct assessment which addresses the contaminant plumes in relation to the surface water. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure. Notify property owners if impact is documented.
<input type="checkbox"/> 2.7	A public or domestic water supply well that produces from a groundwater zone which is not impacted or threatened is located within the known extent of contamination. (Answer yes if a well is present, but the well use is unknown.)	Notify well users and property owners. Determine completion data and usage of water well(s). Conduct receptor survey to locate additional sensitive receptors. Investigate well impact or cross-contamination potential. Plug well(s) if necessary. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure. Monitor water well for groundwater quality.

## PRIORITY 3 SITES

	PRIORITY	ACTIONS
<input type="checkbox"/>	3.1 <sup>1</sup> Groundwater is impacted and a public or domestic water supply well is located between 0.25 and 0.5 miles from the UST/AST system or source area. (Answer yes if a well is present in this interval, but the well use is unknown.) (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Evaluate well impact potential. Evaluate need for remediation.
<input type="checkbox"/>	3.2 Groundwater is impacted and the impacted groundwater zone may discharge between 500 feet and 0.25 miles of the UST/AST or source area to a surface water body used for human drinking water, contact recreation, or habitat to a protected or listed endangered plant and animal species.	Conduct assessment which evaluates potential to impact the surface water. Evaluate need for remediation.
<input type="checkbox"/>	3.3 <sup>1</sup> Groundwater is impacted and a non-public or non-domestic water supply well is located within 0.25 miles of the UST/AST system or source area. (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Evaluate well impact potential contaminate. Evaluate need for remediation.
<input type="checkbox"/>	3.4 A non-community or non-domestic water supply well that produces from a groundwater zone which is not impacted or threatened is located within the known extent of contamination. (If a well is present, but the use of the well is unknown, answer yes to 2.7 instead.)	Notify well users and property owners. Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Investigate well impact or cross-contamination potential. Monitor water well for groundwater quality. Evaluate need for remediation.
<input type="checkbox"/>	3.5 <sup>2</sup> A designated major or minor aquifer groundwater is impacted or immediately threatened. (See footnote 2 before responding.)	Conduct assessment of soil and groundwater contaminant plumes in relation to major or minor aquifer. Conduct receptor survey and water well inventory. Evaluate need for remediation.

## PRIORITY 4 SITES

	PRIORITY	ACTIONS
<input type="checkbox"/>	4.0 The extent of contamination has not been defined, but there is no indication that any of the other case priority conditions apply.	Conduct assessment of soil and/or groundwater contaminant plumes. Conduct receptor survey and water well inventory. Evaluate site conditions to determine need for additional corrective actions.
<input checked="" type="checkbox"/>	4.1 Groundwater is affected.	Conduct assessment of soil and groundwater contaminant plumes. Conduct receptor survey and water well inventory. Evaluate site conditions to determine need for additional corrective actions.
<input type="checkbox"/>	4.2 The vertical extent of contamination has been defined and the assessment results document that groundwater is not affected.	Conduct assessment of soil contaminant plume. Conduct receptor survey and water well inventory. Evaluate site conditions to determine need for additional corrective actions.

1. Consider only: wells producing from the same interval as the impacted groundwater zone at the release site, wells which may provide a cross-contamination pathway, or wells where completion details are unknown.
2. Refer to Major and Minor Aquifers of Texas Maps prepared by Texas Water Development Board, September 1990. Do not consider the low permeability Beaumont clays of the Beaumont Formation for the Gulf Coast aquifer. Do not consider a perched groundwater zone overlaying the principal producing portion of the aquifer unless the two are hydrologically connected.

## COUNTY CODE LIST

1	Anderson	38	Childress	75	Fayette	112	Hopkins	149	Live Oak	186	Pecos	223	Terry
2	Andrews	39	Clay	76	Fisher	113	Houston	150	Llamb	187	Polk	224	Throckmorton
3	Angelina	40	Cochran	77	Floyd	114	Howard	151	Loving	188	Potter	225	Titus
4	Aransas	41	Coke	78	Foard	115	Hudspeth	152	Lubbock	189	Presidio	226	Tom Green
5	Archer	42	Coleman	79	Fort Bend	116	Hunt	153	Lynn	190	Rains	227	Travis
6	Armstrong	43	Collin	80	Franklin	117	Hutchinson	154	McCulloch	191	Randall	228	Trinity
7	Atascosa	44	Collingsworth	81	Freestone	118	Irion	155	McLennan	192	Reagan	229	Tyler
8	Austin	45	Colorado	82	Frio	119	Jack	156	McMullen	193	Real	230	Upshur
9	Bailey	46	Comal	83	Gaines	120	Jackson	157	Madison	194	Red River	231	Upton
10	Bandera	47	Comanche	84	Galveston	121	Jasper	158	Marion	195	Reeves	232	Uvalde
11	Bastrop	48	Concho	85	Garza	122	Jeff Davis	159	Martin	196	Refugio	233	Val Verde
12	Baylor	49	Cooke	86	Gillespie	123	Jefferson	160	Mason	197	Roberts	234	Van Zandt
13	Bee	50	Coryell	87	Glasscock	124	Jim Hogg	161	Matagorda	198	Robertson	235	Victoria
14	Bell	51	Cottle	88	Goliad	125	Jim Wells	162	Maverick	199	Rockwell	236	Walker
15	Bexar	52	Crane	89	Gonzales	126	Johnson	163	Medina	200	Runnels	237	Waller
16	Blanco	53	Crockett	90	Gray	127	Jones	164	Menard	201	Rusk	238	Ward
17	Borden	54	Crosby	91	Grayson	128	Karnes	165	Midland	202	Sabine	239	Washington
18	Bosque	55	Culberson	92	Gregg	129	Kaufman	166	Milan	203	San	240	Webb
19	Bowie	56	Dallam	93	Grimes	130	Kendall	167	Mills	204	San Jacinto	241	Wharton
20	Brazoria	57	Dallas	94	Guadalupe	131	Kenedy	168	Mitchell	205	San Patricio	242	Wheeler
21	Brazos	58	Dawson	95	Hale	132	Kent	169	Montague	206	San Saba	243	Wichita
22	Brewster	59	Deaf Smith	96	Hall	133	Kerr	170	Montgomery	207	Schleicher	244	Wilbarger
23	Briscoe	60	Delta	97	Hamilton	134	Kimble	171	Moore	208	Scurry	245	Willacy
24	Brooks	61	Denton	98	Hansford	135	King	172	Morris	209	Shackelford	246	Williamson
25	Brown	62	DeWitt	99	Hardeman	136	Kinney	173	Motley	210	Shelby	247	Wilson
26	Burleson	63	Dickens	100	Hardin	137	Kleberg	174	Nacogdoches	211	Sherman	248	Winkler
27	Burnet	64	Dimmit	101	Harris	138	Knox	175	Navarro	212	Smith	249	Wise
28	Caldwell	65	Donley	102	Harrison	139	Lamar	176	Newton	213	Somerville	250	Wood
29	Cathoun	66	Duval	103	Hartley	140	Lamb	177	Nolan	214	Starr	251	Yoakum
30	Callahan	67	Eastland	104	Haskell	141	Lampasas	178	Nueces	215	Stephens	252	Young
31	Cameron	68	Ector	105	Hays	142	La Salle	179	Ochiltree	216	Sterling	253	Zapata
32	Camp	69	Edwards	106	Hemphill	143	Lavaca	180	Oldham	217	Stonewall	254	Zavala
33	Carson	70	Ellis	107	Henderson	144	Lee	181	Orange	218	Sutton		
34	Cass	71	El Paso	108	Hidalgo	145	Leon	182	Palo Pinto	219	Swisher		
35	Castro	72	Erath	109	Hill	146	Liberty	183	Panola	220	Tarrant		
36	Chambers	73	Falls	110	Hockley	147	Limestone	184	Parker	221	Taylor		
37	Cherokee	74	Fannin	111	Hoed	148	Lipscomb	185	Parmer	222	Terrell		

To the Responsible Party - please note that the Release Report Form (TNRCC-0621) must be completed and submitted within 20 days from the date of release discovery.

LPST CASE  
INCIDENT REPORT  
TNRCC Use Only

LPST ID No. 112934 Facility No.: 0050235 Priority: 4.1 Region: 04

Region Lead  Central Office Lead  Date: 01-28-98

This case was previously a Region lead case and is now being referred to the Central Office

Date of referral: \_\_\_\_\_

Responsible Party (RP) Name: Addison Aviation / Cherry Air  
Address: 4584 CLAIRE CHENNAULT  
City: DALLAS State: TX Zip: 75248  
Contact Person: Mr. Jim Donaldson, President  
Phone: (972) 248-1707 Fax: (972) 380-0046

The RP is the:  Tank Owner  Tank Operator  Land Owner  
 Other

Facility Name: Cherry Air Fuel Farm  
Physical Address: 15405 Addison Road City: Addison County: Dallas No. 057

Do the contaminant levels exceed the action levels?  YES  NO. If No, and the site does not meet any of the other required conditions for an LPST site (see page 3 of the Release Report form), this site is not an LPST site and an ID number should not be issued.

How was the release confirmed?

- Sample results from tank removal from service activities
- Sample results from other release determination activities
- Emergency environmental impact (vapor impact, water well impact, etc.)

Specify type of impact:

Presence of non-aqueous phase liquids (Shown in nearby excavation for a water line. Location has a history of overfills of Jet A Fuel)  
 Other

Prior to this release incident, was this site an LPST site?  YES  NO

If Yes, provide LPST ID no.: N/A

Comments: large spill of Jet A Fuel occurred on 11/25/97 (~200 gallons) which filled a drainage ditch. The water line trench was dug a few feet from the drainage ditch.

Region Inspector: Lonnie Gilley Date: 01-28-98  
Approval (if required): \_\_\_\_\_ Date: \_\_\_\_\_

# \* Lone Star Environmental

DBA of \* American Environmental Tank Testing, Inc. \*

## TEST CERTIFICATE

Tank Owner: Cherry Air, Inc.  
Address: 4584 Clair Chennault  
City, State: Addison, TX 75248  
Contact Person: Christine  
Telephone: 972-248-1707  
Site Address: 4584 Clair Chennault  
City, State: Addison, TX 75248  
Test Method: Horner EZY 3  
Test Date: 01/26/98

Tank	Capacity	Product	Tank Result	Line Result	Leak Det. Result
#1	12,000	Jet Fuel	Passed	Passed	NA
#2	12,000	Jet Fuel	Passed	Passed	NA

Remarks: This is to certify that the above tanks and associated piping systems are tight and meet the criteria established by the NFPA pamphlet 329. Suction system: no line leak detector required. Suction system tested under a Horner EZY-3 full system test. Suction piping meets guidelines of section 280.41 (b) (2) of release detection regulations for piping from EPA.

Approval Byron Bolton CA-0372

P.O. Box 152328, Arlington, TX 76015-8828 Tel: 800-738-2600 Fax: 800-426-4403

Corporate Office: 2058 H. Mills #152, Claremont, CA 91711



PUBLIC WORKS DEPARTMENT

Post Office Box 141 Addison, Texas 75001  
9010

(972) 450-3871

16801 Westgrove

January 28, 1993

Certified Mail No. P 108 409 797

Mr. Sam Stuart  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

Re: Fuel Contamination

Dear Sam:

During the replacement of the cross airport water line we became aware that there may be a significant fuel issue along the south side of the Cherry Air fuel farm and the south end of the 300, 400 and 500 series t-hangers.

During the installation of the water line, we observed free fuel product seeping from the ground into the utility trench. On Monday, January 19, 1998, we saw fuel in several areas on the surface of the ground on the Cherry Air fuel farm and the tract immediately west of the site. Kurt Horn and Zane Ryan were notified and clean-up has started.

We are particularly concerned because the petroleum product can adversely impact the water line and even migrate down the water line bedding, negatively affecting the watershed.

I know you are as concerned as we are regarding the potential impact to the surrounding environment from fuel contamination. We respectfully request that this problem, and any other fuel farm contamination be cleaned up as soon as possible.

We suggest the following action:

1. Removing the fuel contaminated soil near the water line.
2. Remove the source of contamination.
3. Immediate clean-up of all fuel spilled on the surface.
4. Report the spill to the Texas Natural Resource Conservation Commission (TNRCC).
5. Contract with a qualified environmental consultant to prepare an assessment of the horizontal and vertical extent of contamination at the site in accordance with TNRCC rules and regulations. The assessment should include whether ground water has been affected. Prepare and implement a corrective action plan if required by TNRCC.

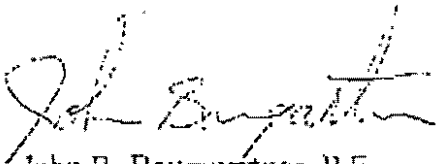
Mr. Sam Stuart  
January 28, 1998  
Page Two

6. Furnish documentation that all technical deadlines required by Texas Administrative Code (TAC) Chapter 334, pertaining to leak detection and overfill protection, have been met.
7. Furnish the Addison Department of Public Works with a copy of all reports and correspondence regarding this matter.
8. Provide evidence that the fuel farms will conform to the December 1998 petroleum storage tank upgrades, mandated by the TNRCC/EPA.

This letter is your formal notice as required under "Section 4 - Upkeep of third Party Areas and Jet Port" of the "Agreement of Specification and Amendment to the Agreement for Operation of the Addison Airport between the City of Addison, Texas, and Addison Airport, Inc.," and "Section 9. Standards of Operation," "Section 16. Alteration, Construction by Company for Airport Purposes," "Section 21. Applicable Governmental Requirements," "Section 23. Federal Airport Aid," and "Section 29. Events of Default and Remedies of the "Agreement for Operation of the Addison Airport between the City of Addison, Texas and Addison Airport Inc."

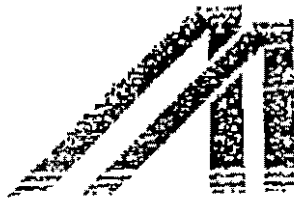
I trust we can work together to get this issue resolved quickly. Please call me at 450-2871 if you have any questions or need additional information.

Sincerely,



John R. Baumgartner, P.E.  
Director of Public Works

cc: Ken Dippel  
Ron Whitehead



## ADDISON AIRPORT

February 3, 1998

### VIA HAND DELIVERY

Mr. James Donaldson  
Mr. John Barbee  
d/b/a Addison Aircraft Storage  
4584 Claire Chennault  
Dallas, Texas 75248

Re: Fuel Contamination

Gentlemen:

Reference is made to a certain Ground Lease made and entered into as of June 17, 1981, between the City of Addison and Addison Airport of Texas, Inc. ("AATI"), as Landlord, and Dunham Oil Tool Company, Inc., as Tenant, which Ground Lease was subsequently assigned to Airport Associates, Ltd., which Ground Lease in turn, by Assignment of Lease made on January 3, 1989, was assigned to James Donaldson and John Barbee d/b/a Addison Aircraft Storage.

Furthermore, reference is made to a certain Ground Lease, commonly known as a Fuel Farm Lease, made and entered into on June 23, 1983, by and among the City of Addison, Texas, and AATI, as Landlord, and Airport Associates, Ltd., as Tenant, which Ground Lease was subsequently assigned to James Donaldson and John Barbee d/b/a Addison Aircraft Storage, by Assignment of Lease made on January 3, 1989.

Pursuant to both Ground Leases, Tenant agreed to comply with all governmental laws, ordinances and regulations applicable to the use of the Demised Premises all at Tenant's sole cost and expense and further agreed to maintain in good repair and condition the Demised Premises and all improvements, fixtures, equipment and personal property on the Demised Premises. Furthermore, Tenant agreed to indemnify and hold AATI harmless for any loss, expense, or claim arising out of damage to property or person on or about the Demised Premises and any adjacent area thereto owned by Landlord.

By letter dated January 28, 1998, the Town of Addison gave written notice to AATI that you were not adhering to the terms and provisions of your Ground Leases regarding the maintenance and condition for your Demised Premises and, in particular, the Town made reference to fuel contamination.



Mr. James Donaldson  
Mr. John Barbee  
February 3, 1998  
Page 2

A true and correct copy of the January 28, 1998 letter is enclosed herein and incorporated by reference.

Demand is hereby made upon Tenant to remedy the deficiencies identified in the Town's written notice of January 28, 1998 to AATI.

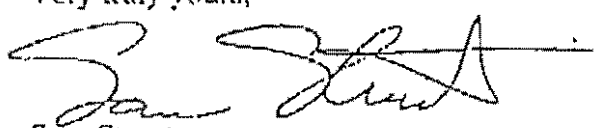
Failure of Tenant to comply with any term, condition or covenant of the Ground Leases and the failure to cure such deficiencies within 30 days after written notice to Tenant shall be an event of default by Tenant under the Ground Leases.

In the event of a default, AATI will enforce the terms and provisions of the Ground Leases and pursue its remedies it may have under the Ground Leases or at law or in equity.

If you have any questions about the Town's letter, please contact Mr. John Baumgartner, Director of Public Works, at (972) 450-2871.

We would appreciate your response to AATI regarding this matter within ten (10) days.

Very truly yours,



Sam Stuart  
President  
Addison Airport of Texas, Inc.

Enc. (January 28, 1998 letter from Town of Addison)

# Cherry-Air, Inc.

"Complete Aviation Involvement"

February 12, 1998

Mr. Sam Stuart  
President  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Dallas, TX 75248

RE: Fuel Contamination

Dear Mr. Stuart:

I am writing in reference to your letter of February 3, 1998, and Mr. John Baumgartner's letter to you dated January 28, 1998, concerning the fuel contamination at our fuel farm.

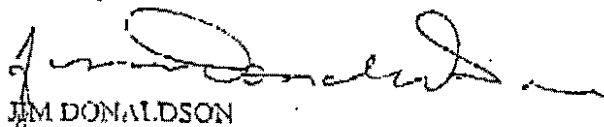
As you are aware, I have been involved with the operation of this fuel farm in excess of 14 years prior to the fuel spill in November.

I want to express my concern over the fuel spill and pledge my commitment in removing the contamination. Action that we have taken to this date is:

1. Removed all fuel from surface of ground.
2. Removed the fuel contaminated soil
3. Contracted to an environmental service to dispose of contaminated soil
4. Contracted to have our tanks pressured tested
5. Contracted to an environmental consultant to investigate and prepare a proposal for corrective action
6. Contacted the TNRCC
7. Reported our procedures and actions to Mr. John Baumgartner and Mr. Neil Gayden with the Town of Addison

I will keep you informed as to our progress in the clean up of this contamination.

Sincerely,



JIM DONALDSON

JD/jmc

## RISK BASED ASSESSMENT WORKPLAN

LPST ID No.: 112934  
Responsible Party: Addison Aviation/Cherry Air  
Facility Name: Cherry Air Fuel Farm  
Facility Address: 15405 Addison Rd.  
Facility City: Addison  
Facility County: Dallas  
Facility ID No.: 0050235  
TNRCC Region: 04  
Case Priority: 4.1

### Site Description/History

This site contains two (2) 12,000 gallon USTs which both contain JP 4 aviation fuel. Small transport trucks are filled from these 2 tanks to be used to refuel aircraft on Addison Airport property.

On or around November 24 and 25, 1997, during the delivery of fuel to these two tanks, one of the tanks was overfilled and JP 4 fuel released to the surface. This spill was remediated by the responsible party and approximately 100 yards of soil excavated and disposed of.

On Monday, January 19, 1998, Addison Aviation was informed by the Town of Addison and Addison Airport of Texas, Inc., that they observed possible significant fuel contamination adjacent to the tank area during the replacement of a water line. It was assumed that a second spill had occurred. This spill was remediated by the RP by removing approximately 120 yards of soil, followed by transportation and disposal.

The RP contracted with Lone Star Environmental to test both tanks and lines at this location. The results indicated the system was tight.

The RP was directed by Addison Airport to, among other items, "contract with a qualified environmental consultant to prepare an assessment of the horizontal and vertical extent of contamination".

During our inspection of the site, we observed free product floating on water in an excavation approximately 5-6' deep, southwest of the tank cavity, approximately 60' away.

## WORKPLAN

Proposed Activity: 04-1 Risk Based Assessment

### Goals of Proposed Activity

1. Determine the vertical and horizontal extent of soil contamination
2. Delineate groundwater contamination
3. Compare findings and results to Plume Delineation Criteria
4. Compare findings and results to the RBA guidelines for possible closure under Plan A

## Description of Activities

### 1. Preliminary Planning

**Review Existing Facility Information:** List of all facilities (not limited to PST regulated) within 500 feet of the site that could be a source of contaminants will be obtained. Information such as regional geology and hydrogeologic maps will be briefly reviewed. The use of uppermost groundwater zone within a 0.5 mile radius from the LPST site will be identified and evaluated.

Past, current and future land uses of the site will be investigated and described. Based on the current land use, the site and the area will be identified as either commercial, industrial, or residential. Information related to source history such as current and former tank systems, potential sources on and offsite, inventory control records, tank tightness tests and previous onsite assessment work will be obtained and evaluated.

**Receptor Survey:** A walking field survey within a 500 foot radius of the site and a database search of water well records within a 0.5 mile radius from the site will be conducted to identify potential receptors and exposure pathways.

**Conceptual Site Model:** Information obtained during the preliminary planning phase, in conjunction with considerations for Plan A and site prioritization, will be used to obtain a three-dimensional representation of the site conditions and an initial Conceptual Site Model (CSM) will be developed. During the investigative process, the CSM will be reevaluated to reflect the actual site conditions.

2. One 10-hour day of direct push sampling will be required to adequately determine lateral delineation of soil contamination. Sampling will begin at the tankhold then radiate outward until soil contamination is no longer observed. Continuous sampling will be performed at each of the sample points and a photo ionization detector will be utilized to field screen samples and aid in the selection of samples to be submitted for laboratory analysis.

A minimum of fifteen soil samples obtained from the temporary sample points will be submitted to the laboratory and analyzed for Total Petroleum Hydrocarbons (TPH), EPA Method 1005, and Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX) by EPA Method 8020. The soil sample exhibiting the greatest TPH concentration will additionally be analyzed for Polynuclear Aromatic Hydrocarbons (PAH) by EPA Method 8270. One soil sample will be obtained and submitted for Soil Parameter Analyses.

Groundwater samples will be obtained from the temporary points, where possible. A maximum of 12 groundwater samples obtained from the temporary sampling points will be submitted for laboratory analysis. Samples will be analyzed for TPH, BTEX and Methyl Tert Butyl Ether (MTBE), EPA Method 8020. The groundwater sample exhibiting the greatest concentration of TPH will additionally be analyzed for PAH by EPA Method 8270.

One upgradient water sample with analysis results below detection limits in all constituents will be analyzed for Total Dissolved Solids (TDS) by EPA Method 160.1.

3. Four monitor wells will be installed to document contaminant migration and groundwater flow. One (1) 4" well will be placed near the fuel cavity. Two (2) 2" wells will be placed in positions down gradient from the cavity. One 2" well will be placed in an upgradient position. Each well will be constructed with PVC casing and installed to an approximate depth of 20'. Groundwater levels encountered during push sampling and during the drilling process will determine the screened interval. The wells will be developed, properly purged, then sampled with disposable bailers. Samples will be submitted to the laboratory and analyzed for TPH, BTEX and MTBE. The groundwater sample exhibiting the greatest concentration of TPH will additionally be analyzed for PAH by EPA Method 8270. Prior to sampling, groundwater level measurements will be obtained for the preparation of a groundwater gradient report. Soil samples from the zone of greatest contamination, immediately above the saturated zone, and from the bottom of the boring of each well will be submitted for laboratory analysis of TPH and BTEX. The soil sample exhibiting the greatest TPH concentration will additionally be analyzed for PAH by EPA Method 8270.

### Reporting of Activities

Following the completion of the activities described above, an *Assessment Report* form (TNRCC-0562) will be submitted to TNRCC.

### Waste Management

All soil cuttings, development and purge water will be stored in 55-gallon drums prior to transportation and disposal at approved facilities.

### Preapproval Request Forms

Based on the ineligibility of this site for reimbursement from the state, no preapproval request form is included.

### Assumptions

The proposed workplan and cost estimates are based on the following assumptions:

- The groundwater on site is impacted
- The depth to groundwater will be less than 20 feet below ground surface. A total of up to 20 temporary direct push sampling points and a total of four permanent monitoring wells will be installed. Monitor well placement will be determined by on site conditions derived from push sampling. If the field conditions are such that additional work is required, costs will change appropriately. *Verbal authorization from the TNRCC case coordinator will be obtained prior to implementing additional work.*

- The field work is assumed to last three days (Monday through Wednesday). The proposed schedule of the field work is itemized as follows:
  - Day 1: Installation of temporary sampling points
  - Day 2: Installation of permanent monitoring wells
  - Day 3: Well development and sampling
- Ten drums of soil cuttings and three drums of development and purge water will require disposal as follows:
  - soil cuttings will be disposed as Class II non-hazardous waste at a landfill approved to accept Class II non-hazardous wastes
  - development and purge water will be sent to a fluids recycling facility

#### **Attachments**

Site Map

ADDISON ROAD

APPROXIMATE AREA OF PROPOSED INVESTIGATION

VACANT SOIL COVERED AREA

FENCED STORAGE AREA

GRASS

TAXI WAY

GRASS

HANGAR BUILDING

WOODEN FENCE

GATE

12K GP-4 UNDERGROUND TANK

12K GP-4 UNDERGROUND TANK

GRAVEL COVERED

SOIL

STORM DRAIN APPX 1 FOOT DEEP

OPEN EXCAVATION APPX 6 FEET DEEP NAPL CH WATER

DISCHARGE TO SURFACE

SURFACE DRAINAGE AREA

SOIL COVERED

LODGE BUILDING

GRASS

GRASS



Denotes approximate locations of proposed monitor wells

ENVIRONMENTAL ASSOCIATES, INC.



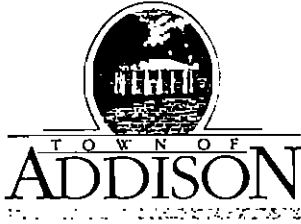
LEAK-TEC CORPORATION

SITE LOCATION : 15405 ADDISON ROAD

MAP TYPE : PROPOSED AREA OF INVESTIGATION

DATE : 2/16/98





CITY MANAGER'S DEPARTMENT

• (214) 450-7000 • FAX (214) 960-7684

Post Office Box 144 Addison, Texas 75001-0144

5300 Belt Line Road

April 7, 1998

Mr. Kurt Horn  
Addison Airport of Texas, Inc.  
4505 Claire Chennault  
Addison, Texas 75248

**DRAFT**

Re: The Fuel Farm Site

Dear Kurt:

Thank you for your letter regarding the Town's interest in the existing fuel farm site. The Town of Addison believes that there is a possibility that some or all of the fuel farms may be relocated after December 30, 2000.

The Town is concerned with the current fuel farm operation and the limited financial security provided by the fuel farm owners and fuelers regarding their operation.

If AATI extends those ground leases through the year 2000, the Town of Addison strongly recommends the following minimum action:

1. That the fuel activity is brought into compliance with TNRCC and EPA requirements.
2. That the appropriate security is provided to remove all fueling equipment and remediate the soil to a condition acceptable to the TNRCC, and allow for the commercial redevelopment of the property.
3. That an approved "Spill Prevention Control and Countermeasures (SPCC) Plan" be developed and implemented by the fuel tank owners and fuelers.
4. That an approved "Emergency Spill Response Plan" be developed and implemented.
5. That all LRST be properly remediated and closed out with the TNRCC.
6. That upon completion of the lease all fueling equipment be removed and the soil remediated if necessary.

I trust that this gives you the needed direction to make decisions regarding the fueling operations for the next three years. This is a complex issue and we need your help to clear up any concerns associated with the fueling activities and to maintain and/or develop a facility we can all be proud of.

If you have further questions in this matter please contact me at 972/450-7010.

Sincerely,

Chris Terry  
Assistant to the City Manager

**DRAFT**

cc: John Baumgartner  
Ken Dippel  
Ron Whitehead



Message from  
Neil Gayden:

1-15-98

Called TNREC

want layout of fuel farm

want Origin of fuel

check water line affects? (meths  
in a cont. am. env.)

TNREC Will come out -

Neil → 9AM Fri meet w Brandon

Told we would continue digging  
TNREC OK with that.



BAR CONSTRUCTORS INC.

**GAMA GUEVARA**  
FOREMAN

P.O. BOX 10  
805 KATY STREET  
LANCASTER, TEXAS 75146

(214) 227-3287  
FAX (214) 227-9043

1-15-98

## Airport Water & Sewer Project

Just before Noon, John Baumgartner requested I look at a water line trench on the airport just north of the old Post Office.

In the process of installing a water main, workmen encountered fuel mixed with the groundwater entering the trench. The work had stopped by the time I arrived.

Bar Constructors, Inc. Foreman, Gama Guovara, had taken a sample of the groundwater/fuel mixture. There was approximately  $\frac{1}{8}$ " of "free product" in the sample. The sample ~~was~~ smelled like kerosine.

Others present were Brandon Griesel, AATI; Neil Gayden, Addison; and Ron Hartline, CDM. Zani Ryan of AATI arrived soon afterward.

I asked Neil Gayden to report the incident to TNRCC. I suggested to the contractor that if they continue trenching, to keep earth "dams" between sections of trench to isolate the groundwater and get an idea of extent of affected groundwater along the trenchline. The foreman stated he would do no more work at that location.

until tomorrow,

Brandon and Zane advised that there was a fuel spill at nearby Cherry Air fuel farm of kerosene (Jet fuel) in November 1997.

I advised Jeff of the above when I returned from the field. Jeff stated that the kerosene would affect the water line gaskets (in the joints) and that the water line would probably be moved out of that area.

John

cc John

Pick Bowles 912-771-2254 1-15-98

Contact Property Owner

817-469-6750  
Melvin Lewis  
Reg. mgr.

Contact TNRC - / Arlington  
advise them

Don't know source

Will go back on responsible party

Owner/Operator

If don't report, @ real risk  
for criminal penalties

Will require ~~an~~ an assessments