AIRPORT ASSESS ACTION PLAN

11-9-00 John Baumgartner's review of Status of recommendations

Drainage Swales

Large stormwater drainage channels were identified at Addison Airport near the north and south ends of the property and smaller drainage ditches were also observed along aircraft taxiways near the hangers and maintenance shops. Since most stormwater leaving the site must flow through these stormwater courses, there is potential for accumulation of contaminants in the sediments of these basins over time. A slight fuel sheen was observed on the stormwater leaving the site on the west side of the property during this project.

Septic Tanks

Four facilities have indicated that they used septic tanks and associated leach fields prior to the installation of sanitary sewer lines. It is believed that the sanitary sewer system was made available to the airport in the early 1960's, however, an exact date could not be determined. It is likely that the following facilities may have used septic tank systems since they were all present on the airport property during its early development.

1) Air Traffic Control Tower
2) Cragin Hanger and Maintenance Shop
3) The Six Hanger and Maintenance Shop
4) 600 Series Hangers
5) Current Omniflight facility across from Ari-Ben Aviator facility
6) Ari-Ben Aviator facility (Old South Terminal Building)
7) Centerline Aviation Hanger
8) Classic Aviation Hanger and Maintenance Shop
9) Jet 1 and 2
10) Mercury Air Hanger 2 (Across from their main FBO Terminal)
11) The Av Group and Skytech Hangers (Former Collins Hangers)

Since maintenance activities have been performed in most of these facilities for long periods of time, septic tanks pose potential environmental concern because the floor drains and other drains in these facilities could have been connected to the septic tank system and used to improperly dispose of unwanted chemicals or waste products.

Fill Areas

Fill areas were identified at the north and south ends of the main runway and along the western property boundary in several locations. One suspected fill area was also identified beneath the current Millionaire facility during the course of the project. While it appears that some fill areas may contain construction debris, the complete contents of the fill in each area is unknown.

Recommended Actions

Based on the limited information currently available, CDM's recommended actions for each of the areas of concern previously discussed are provided below.

Underground and Aboveground Storage Tanks

Registration Inconsistencies

CDM recommends that the current owners/operators of all the UST systems should review their current registration information to assure that the information is correct. If it is not correct, updated information should be submitted to TNRCC as soon as possible. The Town should monitor this activity to assure that it is completed correctly.

Regulatory Issues

Based on the TNRCC files reviewed, the site investigation report for the Texas Pro Air LRST site is overdue. CDM recommends that the owner/operator of this facility request an extension from TNRCC and complete the report as soon as possible to avoid possible fines.

A complete tank inventory and compliance inspection should be performed on all of the USTs located at the airport to determine the required upgrades needed to bring these systems into compliance with TNRCC UST regulations. Following completion of the compliance inspection, CDM also recommends that all of the USTs be upgraded to bring these systems into compliance.

A Spill Prevention, Control and Countermeasures (SPCC) Plan should also be developed for the fuel farm area since over 42,000 gallons of fuel is currently stored underground in this area.

Release Investigation

All of the fuel farms, other UST/AST tank systems, hydraulic lifts and the petroleum pipeline should be investigated to determine the absence or presence of surface and subsurface soil and groundwater contamination. These areas should be characterized through a combination of surface, subsurface and/or groundwater sampling and testing to establish current baseline soil and groundwater conditions.

At the LRST sites, investigation/remedial action is either ongoing, idle, or groundwater monitoring activities are being performed. Regardless of status, TNRCC files should be reviewed to obtain most recent soils and groundwater characteristics to assist with remediation efforts in these areas. Limited baseline sampling and testing is also recommended in these areas.

Since most UST owner/operators will likely attempt to close their facilities under TNRCC Petroleum Storage Tank Risk Rules, the Town should ensure that appropriate cleanup standards are required to meet future development and land use plans for the area. The Town may also want to consider entering some or all of these sites into the TNRCC Voluntary Cleanup Program (VCP). Once accepted into this program, the TNRCC will issue a Certificate of Completion that will assist in limiting the property owner's future liability once satisfactory cleanup

has been completed. The Certificate of Completion is also transferable to future property owners.

CDM also recommends that a limited metal detection survey be performed in the area surrounding the pipe observed at the Centerline facility to determine if a UST is located in this area.

Significant Fuel/Chemical Spills and Stained Soil

To effectively assess the surface stains and spill areas identified, a limited soils sampling program should be implemented to develop options for cleanup. Excavation and proper disposal of the stained areas appears possible since most areas are small. Investigation/cleanup could be performed by the Town or site tenants.

An Emergency Spill Response Plan should also be developed that includes spill control, containment and cleanup procedures that would be implemented in the event of a future spill. This plan would include emergency contact and reporting numbers and typically will include training on program implementation.

Stormwater

NPDES Permit

The NPDES Permit and SWPPP need to be completed as soon as possible to bring the Airport into compliance with current federal regulations. Two specific areas of concern that should be addressed in the SWPPP including airplane washing and exterior waste storage areas. If necessary, a qualified consultant experienced in stormwater management practices at airports should be retained to complete this work.

CDM recommends that all of the waste materials currently stored outside in 55-gallon drums and small ASTs should be characterized, removed from the property and properly disposed. Most of the wastes observed on site have been in the same location for long periods of time. Following removal of these wastes, any new wastes or chemicals that need to be stored outside should be enclosed in an appropriate outdoor storage container that can provide protection from stormwater runon/runoff and can also provide secondary spill containment. An example of exterior waste/chemical storage containers recommended for use at Addison Airport are provided for review in Appendix A.

Floor Drains

CDM recommends that a drainage study be completed for all the floor drain systems at the airport to document where these systems discharge. If the drains in these facilities discharge to a stormwater course, limited testing should be performed on the soils in these areas to determine if they have been impacted by the improper disposal of chemical wastes through the years. This study should also be useful in developing the SWPPP for the airport. Specific attention should be placed on the drainage ditches behind the Cragin hanger and adjacent to the

Classic Aviation hanger since suspected contaminants were identified in these areas during this project.

Storm Drains

During limited drainage testing that was performed by the Town on exterior storm drains, some drains were found to be connected to the sanitary sewer system instead of the storm sewer system. CDM recommends that the drainage study be expanded to include all exterior storm drains. This extended drainage study will assist in verifying if each storm drain is currently connected to the sanitary or storm sewer systems so that system modifications can be made, as necessary.

Drainage Swales

Sediments from the stormwater drainage swales identified at the airport should also be analyzed to determine if significant contaminants have accumulated in these areas over time.

Septic Tanks

CDM recommends that additional research be performed to effectively locate where septic tanks and leach fields were located and a limited subsurface sampling and testing program should be completed to determine the absence or presence of subsurface contaminants in these areas.

Suspected Fill Areas

Each of the suspected fill areas should be investigated to determine the makeup of the fill material located in each area, if any. If fill is identified, the investigation should be expanded to determine the absence or presence of potential surface and subsurface soil and groundwater contaminants that may be present. These areas should be characterized through a combination of surface, subsurface and/or groundwater sampling and testing to establish current baseline soil and groundwater conditions.

Based on available information reviewed during this project, it does not appear that a Municipal Solid Waste Permit needs to be obtained for the fill areas identified at the present time. However, permitting and closure in accordance with TNRCC regulations may be required if wastes other than construction debris are found during investigation activities or if the dumping of asphalt and other debris continues in the future. Therefore, CDM recommends that no further construction debris be used as fill material on this property. These materials should be disposed off-site in a permitted landfill facility in the future.

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AATI's
Consultant

Addison Airport Action Plan

Addressing Potential Environmental Concerns Identified in the February 1998 Phase 1 Environmental Site Assessment Report

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May 19, 1998

Addison Airport Action Plan

Addressing Potential Environmental Concerns
Identified in the February 1998
Phase 1 Environmental Site Assessment Report

Table of Contents

1. Introduction

In March 1998, the Town of Addison issued a Phase 1 Environmental Site Assessment (ESA) Report for the Addison Airport. The ESA Report presented the findings of an environmental site assessment conducted by Camp Dresser & McKee Inc.(CDM). The objectives of the environmental site assessment were to identify potential environmental concerns on the airport property that could affect future management plans and assess the current environmental condition of the airport.

The ESA utilized a combination of records research, interviews, and site inspections to meet its stated objectives. No scientific or engineering sampling and analyses were performed during the ESA. The ESA Report identified operational activities and facilities and areas of the airport property that present potential environmental concerns. In most cases, the basis for the potential environmental concern was listed.

Upon receipt of the ESA Report, Addison Airport of Texas, Inc. (AATI) began evaluating the potential environmental concerns identified in the ESA Report. AATI has not independently evaluated whether the concerns identified in the CDM report are valid. On March 19, 1998, the Town of Addison issued a letter directing AATI to prepare an Action Plan to address the potential environmental concerns contained in the report within 60 days. Accordingly in response to the Town of Addison's request, AATI submits this Action Plan.

1.1 Purpose

The purpose of the Action Plan is to provide an action plan to address the issues identified in the ESA Report. The Action Plan includes evaluation of potential environmental concerns identified in the ESA Report and provides a summary of the actions conducted to date. The Action Plan also details proposals for further assessment of areas of environmental concern identified in the ESA Report. In preparing and submitting this Action Plan, however, AATI does not admit liability for these environmental concerns. The implementation of this Action Plan is dependent upon sufficient appropriations from the Addison Airport Upkeep Budget in addition to the cooperation of the Town of Addison and Airport tenants.

1.2 Priority Schedule

The initial step in addressing any potential environmental concern is to evaluate the degree and extent of the concern. The American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments (E 1527-94) was used by CDM and provides the industry's standard for conducting ESA. According to the ASTM standard, all recognized

environmental conditions should be reported. These include the presence or likely presence of any hazardous substances or petroleum products on the property that indicate an existing release, past release, or material threat of a release. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforceable action if brought to the attention of appropriate governmental agencies.

AATI evaluated the potential environmental concerns identified in the ESA Report in order to establish a priority-based plan of action. AATI has met with and had numerous discussions with Town of Addison representatives to discuss the planned approach of the Action Plan. In addition, Town of Addison representatives have been present at several of AATI's meeting with various tenants on the airport. Meetings and conversations have occurred between AATI and the Texas Natural Resource Conservation Commission (TNRCC) and United States Environmental Protection Agency (USEPA). The evaluation of the potential environmental concerns included additional research on the concerns and further site inspections. AATI was joined with Town of Addison representatives during the additional site inspection associated with the surface spills and stained soils identified in the ESA Report.

Based on the results of the evaluation, it is apparent that the potential environmental concerns identified in the ESA Report vary greatly. A prioritized plan was developed in order to effectively address the potential impacts of the potential environmental concerns. The potential environmental concerns identified in the ESA Report were prioritized into the following categories:

List Them

Priority 1:	Imminent threat to human health or the environment or under direct supervision of a regulatory agency;
Priority 2:	Potential threat to the environment; requires further assessment and possible remediation; and
Priority 3:	No apparent threat to the environment; requires further assessment to verify.

List Them

List them

Plans & Costs for Priority 1?

Activities have been implemented and remedies pursued for all Priority 1 items. Plans have been developed and cost estimated prepared for the Priority 2 items. A request to increase the Addison Airport Upkeep budget for this fiscal year has been submitted in order to implement these plans. Plans and cost estimates are being finalized for the Priority 3 items. These items will be included in the Airport Upkeep budget request for next fiscal year.

1.3 Action Plan Organization

The potential environmental concerns identified in the ESA Report have been broken down into the following six primary areas of concern:

Fuel Storage and Dispensing Operations
Storm Water Management
Emergency Spill Response Plan
Surface Spills and Stained Soil
Suspected Fill Areas
Suspected Septic Tanks

Any potential environmental concern that was identified and did not fit into one of these areas was covered in the final section (Other Areas). Each of the following sections contains the prioritized work plan for the particular area of concern.

The estimated costs associated with the activities conducted and planned to be conducted to address the potential environmental concerns identified in the ESA Report are included in Section 3. These costs cover the activities needed in order to assess whether the potential environmental concerns are environmental problems. The estimated costs are only those that have or will be incurred in connection with the upkeep of the airport. They do not include any costs incurred by the tenants.

These costs do not cover any remediation of any site. Should the assessment activities indicate that remediation is needed, a work plan and cost estimate will be prepared.

2. Areas of Concern

2.1 Fuel Storage and Dispensing Operations

According to the February 1998 Phase I Environmental Site Assessment performed by CDM, there are nine active registered Petroleum Underground Storage Tank Facilities located on the Addison Airport property. Two facilities are operated by the Town of Addison and are located at the Service Center and Central Fire Station. The remaining active facilities are used by various operators for aircraft fuel storage and dispensing operations on the airport.

In addition to the active facilities, two former UST facilities are located on the Addison Airport property. One of the facilities formerly provided fuel for emergency backup at the FAA air traffic control tower (ATCT). The other is identified as the former Texas Pro Air facility and provided storage and dispensing operations for aircraft on the airport.

Three primary areas of concern were identified in the Phase 1 report. The first area is registration and compliance with technical standards. The second is corrective actions for Leaking Petroleum Storage Tank (LPST) sites. The third involves the spill prevention and countermeasures plan.

As previously discussed, the plan for addressing the environmental concerns identified in the Phase 1 report has been prioritized based on degree of potential impact. All activities associated with the fuel farm area are Priority 1 items. The items listed in the fuel farm area are being resolved under the direct supervision of the TNRCC and EPA.

2.1.1. Registration and Compliance With Technical Standards

Chapter 334, Title 30 of the Texas Administrative Code requires that all underground storage tank (UST) systems be registered and meet certain technical standards concerning construction and operation. The technical standards requirements are phased in over a period of time based on specific conditions at the UST system. Each of the existing UST systems at the Addison Airport must meet these technical standards. Additional technical standards for system integrity testing and cathodic protection, and revised release detection methods are required to be met by December 22, 1998.

AATI representatives have met with the fueling operators on the Addison Airport on several occasions. AATI informed each operator of the applicable state UST requirements and Town of Addison Fuel Permit requirements.

On April 21, 1998, the TNRCC conducted a compliance inspection of the active fuel storage and dispensing operations at the Addison Airport. This inspection did not include the two Town of Addison facilities. The purpose of the inspection was to evaluate the facilities' compliance with the applicable rules and regulations regarding these technical standards. According to the TNRCC, an inspection report will be sent to each of the fueling operators during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days. Revised registration forms were completed by each of the operators as part of the inspection.

Facility No. 22; Multi User Fuel Farm; Operators - Mercury Air Center, Millennium Jet Center, and Ari Ben Aviator

The UST systems located in Facility No. 22 are operated by Mercury Air Center, Millennium Jet Center, and Ari Ben Aviator under either a Public or Non-Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were prepared by Equitable Leasing on behalf of the operators as part of the inspection and have been forwarded to the Town of Addison for approval prior to submittal to the TNRCC.

According to the TNRCC, an inspection report will be sent to each of the operators during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with each operator after the receipt of the TNRCC compliance inspection report. Monitor each operator's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with each operator for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 3036; Operator - Million Air

The UST systems located in Facility No. 3036 are operated by Million Air under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April

21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were completed by Millionaire as part of the inspection.

According to the TNRCC, an inspection report will be sent to Million Air during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with Million Air after the receipt of the TNRCC compliance inspection report. Monitor Million Air's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with Million Air for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 14509; Operator - E.U.A. Air Support (Formerly Mission Properties Company)

The UST systems located in Facility No. 14509 are operated by E.U.A. Air Support (E.U.A.) under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were completed by E.U.A. as part of the inspection.

According to the TNRCC, an inspection report will be sent to E.U.A. during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with E.U.A. after the receipt of the TNRCC compliance inspection report. Monitor E.U.A.'s progress towards making any other upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with E.U.A. for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 15460; Operator - R. Stern FBO Limited

The UST systems located in Facility No. 15460 are operated by R. Stern FBO Limited under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were completed by Stern as part of the inspection.

According to the TNRCC, an inspection report will be sent to Stern during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with R. Stern after the receipt of the TNRCC compliance inspection report. Monitor Stern's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with R. Stern for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 27123; Operator - Town of Addison (Central Fire Station)

According to TNRCC registration records, the Town of Addison operates one 2,000 gallon diesel tank and one 10,000 gallon gasoline tank at this facility. The Phase 1 report indicates that the registration for this facility is correct. Since records from the Town of Addison concerning this facility have not been received, this cannot be verified. No further action is planned for this site.

AATI Action

Follow-up with the Town of Addison for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 35843; Operator - FAA (ATCT)

TNRCC files indicate that one UST was used to supply fuel for the emergency power backup system and removed from this location in 1989. The UST was permanently removed from service. The documents indicate that soil sampling during the removal of the UST did not encounter any elevated levels of petroleum hydrocarbons. The UST facility was granted clean

closure by the TNRCC. No further action is planned for this site.

Facility No. 36935; Operator - Town of Addison (Service Center)

According to TNRCC registration records, the Town of Addison operates one 10,000 gallon gasoline, one 6,000 gallon gasoline, one 1,000 gallon diesel, one 550 gallon used oil, and one tank of unknown size and contents at this facility. The Phase 1 report indicates that the registration for this facility needs to be corrected. Since records from the Town of Addison concerning this facility have not been received, this cannot be verified.

AATI Action

Request that the Town of Addison review the current registration data on this facility. Work with the Town of Addison for the submittal of a corrected registration form, if needed.

Follow-up with the Town of Addison for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 44612; Operator - R. Stern FBO Limited

The UST systems located in Facility No. 44612 are operated by R. Stern FBO Limited under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were completed by Stern as part of the inspection.

According to the TNRCC, an inspection report will be sent to Stern during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with R. Stern after the receipt of the TNRCC compliance inspection report. Monitor Stern's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with R. Stern for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 50235; Operator - Addison Aircraft Storage (Cherry Air)

The UST systems located in Facility No. 50235 are operated by Addison Aircraft Storage (Cherry Air), under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were completed by Cherry Air as part of the inspection.

According to the TNRCC, an inspection report will be sent to Cherry Air during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with Cherry Air after the receipt of the TNRCC compliance inspection report. Monitor Cherry Air's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with Cherry Air for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

Facility No. 63865; Operator - Mercury Air Center

The UST systems located in Facility No. 63865 are operated by Equitable Leasing. Equitable Leasing leases the UST systems to Mercury Air Center under a Public Aircraft Fuels Dispensing Permit issued by the Town of Addison.

According to the Phase 1 report, the registration for this facility needs to be updated. On April 21, 1998, the TNRCC conducted a compliance inspection of the current fuel storage and dispensing operations at this facility. The inspection was to evaluate the facilities' compliance with applicable rules and regulations regarding fuel storage and dispensing. Revised registration forms were prepared by Equitable Leasing on behalf of Mercury Air as part of the inspection and have been forwarded to the Town of Addison for approval prior to submittal to the TNRCC.

According to the TNRCC, an inspection report will be sent to Mercury Air during May. The report will include any deficiencies encountered and actions required to meet the standards. The report will require that each operator resolve any deficiencies within 30 days.

AATI Action

Follow-up with Mercury after the receipt of the TNRCC compliance inspection report. Monitor Mercury Air's progress towards making any upgrades to the UST systems that were identified from the TNRCC inspection.

Follow-up with Mercury for their plan of action to meet the December 22, 1998 technical standards requirements. Monitor the implementation of this plan.

2.1.2. Leaking Petroleum Storage Tank Corrective Actions

Subchapter D of Chapter 334, Title 30 of the Texas Administrative Code sets forth the requirements for reporting and corrective action associated with any release from an UST system. The Phase 1 report identified five LPST sites located on the Addison Airport. One additional LPST site has been added since the Phase 1 report was prepared. The following table summarizes the LPST sites located at the Addison Airport.

Facility Name	Facility Address	Facility ID No.	LPST No.
Addison Airport	4788 Roscoe Turner Road Dallas, Texas 75248	22	91471
Texas Pro Air	15407 Addison Road Addison, Texas 75248	20294	92419
Million Air	15407 Addison Road Addison, Texas 75248	30356	98890
Jet Way	15407 Addison Road Addison, Texas 75248	44612	110033
Central Fire Station	4798 Airport Parkway Addison, Texas 75244	27123	111949
Cherry Air	15407 Addison Road Addison, Texas 75248	50235	112934

AATI representatives met with the listed responsible parties (RP) for the LPST sites, except the Central Fire Station, on several occasions. AATI discussed the RP's plan to meet the TNRCC requirements with each RP. The proposal was made to conduct a single assessment of all of the fuel farms in order to fully address the area while reducing the costs of each RP. Since all of the RPs did not agree, each RP will address his own LPST site with the TNRCC.

Each of the RPs is currently working with the TNRCC. One site has received closure from the TNRCC. Three sites have reports, plans, and/or requests pending with the TNRCC. The field activities have been completed and a report is expected to be submitted to the TNRCC within the next few weeks on the final site.

LPST No. 91471 - Addison Airport

Addison Airport of Texas has conducted several phases of assessment activities at the site in order to define the extent of petroleum hydrocarbons in the subsurface. At the time of the Phase 1 report, TNRCC had requested additional assessment activities to support portions of the Plan A Risk Based Site Assessment submitted in 1997. AATI has conducted the additional assessment activities and submitted an addendum to the risk based site assessment on May 1, 1998. The additional activities included additional soil analyses and groundwater analyses. In addition to the results, the submittal to the TNRCC contained the proposed plan of action for the site. The proposed plan of action includes the collection of additional soil samples in the area of highest petroleum contamination at the facility. In addition, groundwater monitoring was proposed.

AATI Action

Work with the TNRCC on the proposed activities for the site. Conduct the activities that are approved by the TNRCC.

LPST No. 92419 - Texas Pro Air

Texas Pro Air formerly operated fuel storage and dispensing operations from this facility. Texas Pro Air went bankrupt in the 1988 time frame and apparently emptied the tanks of their contents. Shortly thereafter the tanks floated out of the tankpit and breached the surface of the ground. During 1988, five USTs and associated impacted fill material were removed from this facility. Soil samples collected following the UST removal indicated slightly elevated levels of petroleum hydrocarbons remaining in the subsurface. The TNRCC assigned LPST No. 92419 to this facility. TNRCC requested that information concerning the UST closures be submitted and a site assessment be conducted at the site. Although AATI denies that it is the responsible party for this site, it is addressing the site with the TNRCC.

Additional data was generated from the former Texas Pro Air site during the recent risk based assessment conducted by Cherry Air on LPST No. 112934. These data revealed very low to non-detectable levels of petroleum hydrocarbons in the subsurface at the former Texas Pro Air site.

AATI has been in discussions with the TNRCC on this site. A report containing the available data from the 1988 UST closures and data collected from the recent Cherry Air investigation will be submitted within two weeks.

AATI Action
Conduct additional activities if required by the TNRCC.

LPST No. 98890 - Million Air

In 1991, an overfill of one UST prompted the TNRCC to issue LPST No. 98890 for this facility. Million Air was directed by the TNRCC to perform a site assessment to determine the extent of petroleum contamination. Million Air conducted the required site assessment activities and submitted the result to TNRCC. On March 25, 1998, Million Air received a closure letter from TNRCC stating that no further actions are required for this LPST site.

AATI Action
None

LPST No. 110033 - Jet Way

Jet Way formerly operated this facility. A site assessment was performed by R. Stern FBO Limited prior to bringing the UST systems back into service after a long period without use. Elevated levels of petroleum hydrocarbons were encountered in the soil samples collected from the north end of the tank farm. The TNRCC assigned LPST Number 110033 to the site based on these soil sample results.

On May 1, 1998, Stern sent a letter to the TNRCC summarizing the activities performed at the site. The letter also questioned the assignment of the original LPST number and requested closure of the LPST site.

AATI Action
Follow-up with Stern when a response is received from the TNRCC. If additional activities are required, monitor the activities performed at the site and Stern's progress in meeting the TNRCC requirements.

LPST No. 111949 - Central Fire Station

The Central Fire Station has been assigned LPST No. 111949 which identifies the Town of Addison as the responsible party. During the installation of spill and overfill protection equipment at this facility, a leak was discovered in a product line. Free product was encountered in the tankpit. According to Mr. Mark Acevedo of the Town of Addison, the site assessment has been completed. The site is in the final quarter of groundwater monitoring. The Town of Addison intends to request closure of this LPST site at the end of the groundwater monitoring.

AATI Action
Collect the necessary information from the Town of Addison in order to monitor the activities performed at the site and their progress in meeting the TNRCC requirements.

LPST No. 112934 - Addison Aircraft Storage (Cherry Air)

In November 1997, Cherry Air experienced an overfill of product from one of the UST systems. The spilled material was contained and the impacted area was excavated. The TNRCC assigned LPST Number 112934 to this site. Subsequently, another surface spill from an overfill occurred. TNRCC directed Cherry Air to perform a risk based site assessment to determine the extent of petroleum contamination from these incidents.

In April 1998, Cherry Air initiated a risk based site assessment on the site. The laboratory results have been received. The risk based assessment report is expected to be submitted to the TNRCC by the end of May. AATI and their environmental consultants have been provided with preliminary data from the site assessment. Based on the review of the preliminary results, the efforts undertaken by Cherry Air meet the requirements of the risk based site assessment.

AATI Action
Collect necessary information from Cherry Air to evaluate if the site is being assessed and remediated in accordance with TNRCC requirements. Monitor the progress of these activities.

2.1.3. Spill Prevention, Control, and Countermeasures (SPCC) Plan

The preparation of the SPCC plan for the entire fuel farm area is underway. The SPCC Plan is expected to be submitted to the appropriate regulatory agency within the next three weeks. The SPCC Plan covers all of the USTs located in the tank farm area. The SPCC Plan will be incorporated in the airport's overall emergency spill response plan as detailed in that section.

2.2 Storm Water Management

According to the February 1998 Phase I Environmental Site Assessment performed by CDM, the general National Pollutant Discharge Elimination System (NPDES) Permit of the Addison Airport had expired and a notice of intent to obtain a new multi-sector permit had been sent to the USEPA. In addition, several areas of potential concerns were identified in the ESA Report that were possibly impacting storm water management.

On March 12, 1998, AATI received the new NPDES Permit for the Addison Airport. The industrial tenants (37) have submitted Notices of Intent to the USEPA for coverage under the

Addison Airport NPDES Permit. The Addison Airport is the permitee and each of the tenants will be co-permitees.

The activities associated with the storm water management at the Addison Airport are categorized into NPDES Permit Activities and Storm Water Pollution Prevention Plan (SWPPP) Activities. Activities in both categories are Priority 1 items and are underway. Many of the activities have been completed.

The ESA Report also identified the drainage swales at the airport to be areas of potential environmental concerns. According to CDM, there is a potential for the accumulation of contaminants in the sediments of these storm water basins since most storm water leaving the site must flow through them. The evaluation of the drainage swales is a Priority 3 item and is included at the end of this section.

2.2.1 NPDES Permit Activities

On March 12, 1998, AATI received the new NPDES Permit (TXR05E625) for the Addison Airport. The multi-sector general permit requires certain storm water pollution prevention and control measures, possible monitoring and reporting, and annual inspections. Thirty-seven industrial tenants at the airport have submitted Notices of Intent (NOI) to the USEPA for coverage under the Addison Airport NPDES Permit. The initial NOI contained incorrect information concerning the Standard Industrial Codes (SIC) for the tenants. The tenants have submitted revised NOI and most have received their individual NPDES Number. The tenant NPDES Permits relate back to the Addison Airport permit. The Addison Airport is the permitee and each of the tenants are co-permitees.

AATI has had several meetings with the tenants to discuss the storm water management issues and plans. Meetings have been designed to educate the tenants to the requirements of the NPDES permits and to collect and disseminate operational information.

All of the activities associated with the NPDES Permit are Priority 1 items.

The estimated cost to complete the Priority 1 items is $ 15,000. — what are the items?

2.2.2 SWPPP Activities

A Storm Water Pollution Prevention Plan (SWPPP) is required under the conditions of the multi-sector general permit. In January 1998, AATI implemented the SWPPP for the Addison Airport. AATI has contracted with EA Engineering, Science and Technology to evaluate the SWPPP and expand on the plan. EA is a professional environmental consulting firm with strong capabilities in the area of SWPPP. They have prepared several SWPPP for airports including ones for Love

Field and Red Bird Airport in the Dallas area.

EA's evaluation of the SWPPP preparation has been underway. Their recommendations are expected to be ready in three weeks. Their recommendations will be provided to all tenants for review and comment. A training meeting will occur between the tenants and AATI. The formal adoption of the recommendations is expected to occur by the end of June.

Three specific areas of concern were identified in the ESA Report. The initial area involved aircraft washing. The second area involved floor drains. The final area included exterior chemical/waste storage areas,

Aircraft Washing

All tenants have been advised that aircraft washing is no longer allowed on the airport property without proper containment. Tenants with facility drains inside their hangers are allowed to continue to wash aircraft as long as none of the wash water enters the storm system. Exterior aircraft washing has been eliminated except when using a system designed to collect wash water prior to entering the storm system. One tenant has purchased an aircraft washing boom system that complies with this requirement.

AATI is evaluating the need for an aircraft wash rack on the airport property. This system could be used to wash aircrafts outside. Several tenants are evaluating plans to build wash rack facilities at their facility.

Floor Drains

The ESA Report identified three facilities where the floor drains discharged directly to the storm sewer system. The report indicated that several other tenants did not know if their drains connected to the storm or sanitary sewer. CDM recommended that a study be conducted of any floor drain in question and appropriate action be taken to eliminate any discharges through these drains to the storm system.

AATI conducted a study of the floor drains in the facilities at the Addison Airport. Four facilities were found to have floor drains connected to the storm system. These include the 600 Series Hangers; 800 Series Hanger, Stern FBO, and Classic Aviation. The floor drains at Classic Aviation have been plugged with a concrete seal. The floor drains in Stern FBO will be plugged with concrete within the next three weeks. Discharge to these drains have been eliminated but the plugging of the drains cannot occur until a current tenant vacates. The floor drains in the 600 and 800 Series Hangers are being connected to the sanitary sewer system.

The estimated costs of these activities are $20,000.

Exterior Waste/Chemical Storage Areas

The ESA Report identified several areas with exterior waste/chemical storage. Some of these areas had evidence of surface staining associated with them. The discussion and planned actions for the surface staining are contained in Section 2.4.

A meeting was held with the tenants identified in the ESA Report to discuss alternatives to their current storage practices. Most of the tenants have installed proper storage for the areas. AATI continues to work with the remaining tenants to ensure that they are upgrading their storage facilities.

2.2.3 Drainage Swales

Large drainage swales/channels are located near the north and south ends of the airport property. Smaller drainage ditches are located along the runway and through the various airport facilities. Storm water enters the airport property from the surrounding community on all sides.

The ESA Report identifies the drainage swales as potential environmental concerns since contaminated sediment may accumulate in them. The ESA Report recommends the assessment of the sediments contained in the drainage swales.

The initial step in assessing the sediments in the drainage swales will include the collection of three composite sediment samples from each of the three primary drainage swales. The composite samples will be collected from near surface sediments in accordance with standard industry practices. Laboratory analyses for total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), semi volatile organic compounds (SVOC) and total metals will be performed on each of the composite sediment samples. Compounds detected in the sediment samples at levels above the acceptable levels will be identified as the COC. The remaining assessment of each drainage swale will be designed to address the COC. compound of Concern?

If COC are identified in the surficial sediment sample from any drainage swale, a more complete assessment will be implemented. Up to four hand auger borings will be installed. The hand auger borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area with a suspected solvent or fuel impact will be field screened for volatile constituents with a Photo Ionization Device (PID). Soil samples collected from an area with suspected waste oil or heavier petroleum products will be field screened for volatile organics with a PID and for nonvolatile constituents with a Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. In addition, composite sediment samples will be collected from two locations up gradient from the original composite sample locations.

Two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. These samples and the up gradient composite samples will be submitted to the laboratory for the analysis for the COC.

The estimated cost to conduct the assessment of a drainage swale is $15,000. The total cost for assessing the three primary drainage swales is estimated to be $45,000. Since the assessments of the drainage swales are Priority 3 items, the cost estimate will be included in the request for next fiscal year.

2.3 Emergency Spill Response Plan

As previously discussed, the plan for addressing the potential environmental concerns identified in the Phase 1 report has been prioritized based on the degree of potential impact. The preparation of the emergency spill response plan is a Priority 1 activity. The plan is currently being prepared and is expected to be completed within the next four weeks.

The emergency spill response plan will define the reporting requirements and necessary actions for any spill of fuel or other chemicals at the Addison Airport. It will be very specific on the requirements. The location and use of spill response equipment and materials will be detailed.

A mandatory training program will be required for each tenant of the airport as part of the fuel permit requirements to ensure that each have fully trained staff.

AATI is considering requesting the Town of Addison to implement a penalty system for noncompliance with the emergency spill response plan.

The Spill Prevention, Control, and Countermeasures (SPCC) Plan for the fuel farm area will be incorporated into the emergency spill response plan.

The emergency spill response plan will also be incorporated into the best management practices of the Storm Water Pollution Prevention Plan that is being developed.

2.4 Surface Spills and Stained Soil

According to the February 1998 Phase 1 Environmental Assessment report prepared by CDM, numerous "significant fuel/chemical spills" have occurred and areas of stained soil observed at the Addison Airport. The information concerning the fuel/chemical spills and soil staining was obtained through review of existing data (Section 6), interviews with Town/AATI staff and tenants (Section 2), and the on-site visual survey (Section 4). CDM lists the most significant fuel/chemical spills and soil stains identified during the site assessment in Section 7.1.2. In many cases, the information provided on the suspect area is marginal and based on someone's

recollection of an incident which occurred years before. The VSS provided additional data on the suspect areas, but in many cases this data showed no current visual impacts.

A prioritized plan was developed in order to effectively address the potential impacts of the fuel/chemical spills and stained soil areas identified in the Phase 1 report. The initial step of the plan was to conduct a more intensive review of existing information to obtain more information on the suspect areas. The second step was to conduct an inspection of the areas identified in the Phase 1 report to prioritize further actions on this matter. This was completed on April 24 by representatives of AATI, their environmental consultants, and the Town of Addison. The suspect areas identified in the Phase 1 report were then prioritized into the following categories:

Priority 1: Imminent threat to human health or the environment or under direct supervision of a regulatory agency;

Priority 2: Potential threat to the environment; requires further assessment and possible remediation; and

Priority 3: No apparent threat to the environment; requires further assessment to verify.

Activities have been implemented and remedies pursued for all Priority 1 items. Plans have been developed and cost estimated prepared for the Priority 2 items. A request to increase the Addison Airport Upkeep Budget for this fiscal year has been submitted in order to implement these plans. Plans and cost estimates are being finalized for the Priority 3 items. These items will be included in the Upkeep Budget request for next fiscal year.

This section provides the information concerning the suspect areas and their potential impact to the environment. It does not include their potential impacts to the storm water permit and Storm Water Pollution Prevention Plan at the airport. Those potential impacts are contained in the Storm Water Section.

The following paragraphs detail the observations and plans for the areas of concern listed in the Phase 1 report.

2.4.1 Priority 1 Sites

None of the "significant fuel/chemical spills and stained soil" sites identified in the Phase 1 report present an imminent threat to human health or the environment. However, several of the sites are under direct supervision of a regulatory agency. The sites associated with the fuel farm area are under TNRCC oversight and the sites associated with storm water issues are under EPA oversight.

Three Priority 1 sites are associated with the fuel farm area. Several discussions with AATI staff

and tenants reference surface spills of fuels in this area. In addition, observations made during the VSS indicate evidence of fuel stains in the area. The operators of each of the individual fuel farms that are referenced in the interviews have been working with the TNRCC on the assessment and remediation of the sites. Each of these sites were assigned a Leaking Petroleum Storage Tank (LPST) Number by the TNRCC. Details of the activities performed on these sites is contained in the Fuel Storage and Dispensing Operations section.

Several of the sites with evidence of surface stains or a history of spillage are considered Priority 1 due to their potential impact on the storm water discharge quality. The sites are not listed as Priority 1 in this section but are discussed in greater detail in the Storm Water section.

2.4.2 Priority 2 Sites

The Priority 2 sites include those sites with more than a nominal chance of having impacted the subsurface. The activities planned for these sites are primarily designed to assess any impact. Appropriate plans and cost estimates for remediation will be prepared based on the assessment results.

Building No. 2 COOP T-Hanger - Building B

Potential Environmental Concern

1) Stained soil was observed at east end of building.

4/24/98 Observations

This area is the same as the area located west of Building No. 3. See below for observations and planned action.

AATI Action

See Building 3

Building No. 3 COOP T-Hanger - Building C

Potential Environmental Concern

1) Stained soil was observed at east and west ends of building.
2) AST located at east end and petroleum staining was observed at the base of this tank.

4/24/98 Observations

The AST has been removed from the site. Three small areas (one was ~2' in diameter and two were ~1' in diameter) of soil staining was observed in the area of the former waste oil

tank (east end of building). The soil staining did not extend beyond 4" deep.

Guardtop had been placed on the rocks west of the building (between Building Nos 2 and 3). The area covered was ~2' wide by 8' long. The Guardtop has solidified at the surface.

AATI Action
Area east of building; remove approximately 6" of top soil from the areas of the soil staining and replace with clean fill.

Install two hand auger borings in the location of the surface staining. The borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, semi-volatiles, PAH, total petroleum hydrocarbons (TPH) and total metals.

Area between Building Nos 2 and 3, no action.

Estimated Cost $2,400

Building No. 25 Classic Aviation Flight School, Hanger, Maintenance and Automobile Shop

Potential Environmental Concern
2) Stained soil was observed in the drainage ditch adjacent to the north end of the building. A floor drain and sink in the automotive shop discharge directly into this drainage ditch.

Needs more

4/24/98 Observations
There are three areas of impact located along the north side of the automotive shop. One associated with each the sink, floor drain and either additional drain or discharge out of the front door.

The sink discharge area covers approximately an area 4' by 10'. The floor drain area was about 6' in diameter. The third area was about the same as the sink area. Two soil samples were collected and screened with an OVM. Both samples had detectable levels of volatile organic vapors in excess of 1,000 parts per million (ppm).

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

too weak

Building No. 29 Walter Fuller Aircraft Sales Hanger and Maintenance Shop

Potential Environmental Concern

1) A waste oil AST was located outside on the north end of the building. Stains were observed in the soils located beneath the tank and at a separate location along the north side of the building.

5) Stained soil was observed in the grassy area south of this building and petroleum staining was observed in a nearby drainage ditch.

4/24/98 Observations

The waste oil AST had been removed from its location. It was still present at the site but not in use. A concrete pad with curbs has been constructed in the area where the AST was located. Construction of this pad has removed any stains of the soil.

An area of impacted grass approximately 6' by 50' was observed to the south of this building. The distressed vegetation was not continuous through the area. There was not any connection between the location of the impacted areas and potential sources. It appeared that someone had dumped the materials at several locations. One location was stained white with paint. The areas smelled like solvents.

Two storm sewers meet at a location SW of this building in the grass between the taxiway and ramp. Heavy oil staining was observed between these pipes. The stormwater flows from the south to the north.

AATI Action

Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Building No. 30 Jet 10 Hanger

Potential Environmental Concern

1) Soil staining was observed between this hanger and the adjacent All American Aviation Hanger.

4/24/98 Observations

The observations of the area between this building and Building No. 31 are listed below. It appears that the soil staining is a result of operations from Building 31.

AATI Action

See Below

Building No. 31 All American Aviation Hanger and Maintenance Hanger

Potential Environmental Concern

1) Soil staining was observed between this hanger and the adjacent Jet 10 Hanger.

4/24/98 Observations

Two areas of soil staining were observed between the building and Building No. 30. The first area covered approximately 4' by 10'. It smelled of solvents and appeared to have originated from the adjacent chemical storage area.

The second area was located in the NW corner of this area adjacent to Building No. 30. This area appeared to be impacted by waste oil. The impacted area was less than 5' in diameter.

AATI Action

The initial step is to determine the chemicals of concern (COC). Collect a composite surficial soil sample from each of noted soil staining. Submit the soil samples to the laboratory for analyses of total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), semi volatile organic compounds (SVOC) and total metals. Compounds detected in the soil sample at levels above the acceptable levels will be identified as the COC. Each of the areas of noted soil staining may have different COC. The remaining assessment at this facility will be designed to address the COC.

Install one hand auger boring in each of the areas of soil staining. The hand auger borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area with a suspected solvent or fuel impact will be field screened for volatile constituents with a Photo Ionization Device (PID). Soil samples collected from an area with suspected waste oil or heavier petroleum products will be field screened for volatile organics with a PID and for nonvolatile constituents with a Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. After determining the vertical extent of impact, up to 15 additional hand auger borings will be installed to determine the horizontal extent of impact at the depth shown during field screening.

Two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted to the laboratory for the Two soil samples (highest PID reading and total depth) will be collected from three hand auger borings located on the perimeter of the impacted area and will be submitted for COC analyses.

If groundwater or competent limestone is encountered before determining the vertical extent of impact in the initial three hand auger borings, hand auger boring installation will continue as planned in an effort to determine the horizontal extent of the impact area.

After determining the horizontal impact area, a truck mounted drill rig will be utilized to install four 2 in. diameter temporary monitor wells for the collection of groundwater samples. Soil from each monitor well will be sampled continuously, and samples collected from each 2 ft interval for field screening and possible laboratory analyses. Up to three soil samples (highest PID reading, groundwater interface and total depth) from each well will be submitted for COC analyses. After installation of the monitor wells, the top of casing elevations will be surveyed. Depth to water measurements will be collected in all wells to determine groundwater gradient. All wells will then be developed, purged of all groundwater, and sampled after groundwater recharges. Groundwater samples will be submitted for COC analyses.

Estimated Costs $42,000

2.4.3 Priority 3 Sites

The Priority 3 sites have very low possibilities of impacting the environment. However, in order to better understand the possibility additional assessment is needed. The activities planned for these sites are primarily designed to provide an initial assessment of any impact. Appropriate plans and cost estimates for further assessment or remediation will be prepared based on the assessment results.

Building No. 4 300 Series T-Hangers

Potential Environmental Concern

1) AST located at south end of building and soil staining observed under tank.
2) Large fuel spill was occurred in 320.
3) Small soil and rock staining observed in Hangers 17 and outside Hanger 10.

4/24/98 Observations

The floors of the hangers are concrete and asphalt. All staining was on the impermeable surface.

The AST has been removed. No soil staining was observed in the vicinity of the former AST.

AATI Action

Install 1 soil boring at the location of the former waste oil AST. Analyze soil sample for volatiles, semi-volatiles, metals, PAH, and total petroleum hydrocarbons.

Estimated Cost $1,600

Building No. 5 400 Series T-Hangers

Potential Environmental Concern
1) Minor soil staining was observed in Hangers 5, 8, and 22.

4/24/98 Observations
The floors of the hangers are concrete and asphalt. All staining was on the impermeable surface.

AATI Action
None

Building No. 6 500 Series T-Hangers

Potential Environmental Concern
1) Minor soil staining was observed in Hangers 5, 6, 9, and 11.

4/24/98 Observations
The floors of the hangers are concrete and asphalt. All staining was on the impermeable surface.

AATI Action
None

Building No. 7 Cragin Aviation Hanger and Maintenance Shop

Potential Environmental Concern
5) Soil staining was observed along the northern exterior wall and in adjacent drainage ditches.

4/24/98 Observations
The "soil staining" observed along the northern exterior wall of the building and shown in Photo # 34 is sandblasting sand. A small parts sandblaster is vented to the exterior at this location. A small amount of residual sandblasting sand is released. The residual sandblasting sand does not pose a threat to human health or the environment.

According to the ESA Report, the staining of the drainage ditch behind this facility did not originate from this facility. No soil staining was observed in the drainage ditch behind this facility. The distressed vegetation shown in Photo #33 is most likely from standing water and not petroleum impacts. The potential environmental concern from the stained soil in the drainage ditch, as identified in the ESA Report, is covered under the Skytech Facility.

AATI Action
None

Building No. 8 Skytech Aviation Hanger and Maintenance Shop

Potential Environmental Concern
4) Soil staining was observed at the east end of building between Skytech and AV Group hangers. Stained asphalt was also observed beneath the exterior waste oil storage tank located at the NE corner of the building.
According to the ESA Report, the most likely source of the stained soil in the drainage ditch behind the Cragin Facility is the former floor drain discharge from this facility.

4/24/98 Observations
The only staining observed at the east end of the building was associated with the exterior waste oil storage tank. The staining is limited to the asphalt area as seen in Photo # 61.

No soil staining was observed in the drainage ditch behind the Cragin Facility. The distressed vegetation shown in Photo #33 is most likely from standing water and not petroleum impacts.

AATI Action
The ESA Report identifies the most likely source of this stained soil behind the Cragin Facility as the discharge from the Millennium and Skytech facilities prior to their connection to the sanitary sewer system. These facilities are owned by the Town of Addison. Since the potential source of this concern cannot be attributed to a lessee, the following activities will be performed.

Install 2 soil borings in the drainage ditch behind this facility. The borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, semi-volatiles, PAH, total petroleum hydrocarbons (TPH) and total metals.

Estimated Cost $3,000

Building No. 9 Aviation Management Hanger and Maintenance Shop

Potential Environmental Concern

4) Former waste oil AST was located behind their fuel trucks and staining was previously observed by tenant below the tank.
7) Stained soil and rock was observed on west end of building.
8) Four fuel trucks are parked on apron. Numerous small asphalt stains from previous fuel spills were observed.
9) A 55-gallon sump fuel drum was located behind fuel truck parking area. Stained asphalt from previous spills were observed at the base of drum.
10) Stained soil and asphalt were observed near the end of the concrete fence located in front of Av Group facility.

4/24/98 Observations

A waste oil AST was not found at this facility. The sump fuel drum had been removed. Small areas of petroleum staining were observed on the asphalt at the locations of the former AST and drum.

The fuel trucks continue to be parked on the apron of this facility. Small areas of staining were observed on the asphalt near the fuel truck parking.

Stained soil and rock was not found on the west side of the building. The only staining observed on the west side of the building was that associated with the chemical and waste storage practices at Building 8.

Stained asphalt was observed at the north end of the concrete fence located to the east of this facility (Photo # 46). There was no evidence that this petroleum staining extended beyond the asphalt covered area.

AATI Action

Install 1 soil boring at the location of the former waste oil AST. Install 1 soil boring at the north end of the concrete fence located to the east of the facility. Install 2 soil borings in the area where the fuel trucks are parked. The borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, semi-volatiles, PAH, total petroleum hydrocarbons (TPH) and total metals.

Estimated Cost $7,000

Building No. 10 100 Series T-Hangers

Potential Environmental Concern
1) Minor soil/asphalt staining was observed in Hangers 3, 10, 15, and 17.

4/24/98 Observations
The floors of the hangers are concrete and asphalt. All staining was on the impermeable surface.

AATI Action
None

Building No. 11 200 Series T-Hangers

Potential Environmental Concern
1) Minor soil/asphalt staining was observed in Hangers 5, 9, 11, and 15.
2) A large soil stain resulting from Guardtop spillage was observed in Hangers 19 and 20.

4/24/98 Observations
The floors of the hangers are concrete and asphalt. All staining was on the impermeable surface.

The ground inside Hanger 19 and 20 is covered with asphalt and concrete. The spill reported by CDM appears to involve diesel fuel instead of Guardtop.

AATI Action
Recommendations have been made to the tenant of Hangers 19 and 20 to check the integrity of the impermeable surface and repair it if found to be deficient.

Collect one soil sample from the native material beneath Hangers 19 and 20. Analyze the soil sample for BTEX, PAH, and total petroleum hydrocarbons.

Estimated Cost $1,000

Building No. 14 Omniflight Helicopters Hanger and Maintenance Shop

Potential Environmental Concern
1) An exterior waste/chemical storage area were observed. Stained soils and asphalt were also observed in the waste storage area.

4/24/98 Observations
The area beneath the waste/chemical storage area has been paved with asphalt. This area needs to be upgraded in order to meet the SWPPP requirements.

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Building No. 15 Open Air Hangers

Potential Environmental Concern
1) A waste oil AST was located north of this building. Petroleum staining was observed on the asphalt at the base of this tank.

4/24/98 Observations
The waste oil AST has been removed. Minor staining was observed on the asphalt at the location of the former AST.

AATI Action
Install 1 soil boring at the location of the former waste oil AST. The boring will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, semi-volatiles, PAH, total petroleum hydrocarbons (TPH) and total metals.

Estimated Cost $1,500

Building No. 19 Henley's Aircraft Services Hanger and Maintenance Shop

Potential Environmental Concern
1) Stained asphalt from previous fuel spills was observed various locations on their ramp.

4/24/98 Observations
All stains are contained on the paved ramp.

AATI Action
None

Building No. 24 Associated Hanger, Inc.

Potential Environmental Concern

1) A steel pipe is located in the ground on the north side of the building. This pipe could possible be a vent pipe or fill port for an UST.
2) Stained soil was distressed vegetation were observed in the grassy area along the north end of this building and between the Omniflight apron and Centerline tie down areas.

4/24/98 Observations

The steel pipe cannot be located. According to the tenant, he found the steel pipe when it was first identified by CDM but has not been able to find it since. He said the pipe appeared to be part of a recreation area and not associated with an UST.

The "soil staining and distressed vegetation" shown in Photo # 38 is not present. The distressed vegetation shown in the photo appears to be due to truck traffic, not petroleum impacts.

One small area of recent soil staining was observed. An aircraft was parked on the apron with its nose over the grassy area. Motor oil was observed leaking from the engine. The impacted area was approximately 2' in diameter and less than 6" deep.

Three small areas of what appeared to be residual roofing tar or topcoat were observed on the north side of this building.

AATI Action

Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Building No. 28 Concourse Plaza Office Building and Hanger

Potential Environmental Concern

1) A plane was observed leaking fuel from a wing fuel tank.

4/24/98 Observations

The asphalt ramp area had several areas of small fuel stains.

AATI Action

Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Building No. 32 Series 600 Hangers

Potential Environmental Concern
2) Stained soil was observed at the NW corner of the building and in the open area between the two hanger buildings.

4/24/98 Observations
No soil stains were observed at this facility.

AATI Action
None

Building No. 36 Open Air Hangers

Potential Environmental Concern
1) A waste oil AST is located at the north end of the building. Stains were observed on the asphalt beneath and adjacent to this tank.

4/24/98 Observations
The waste oil AST has been removed. Minor staining was observed on the asphalt at the location of the former AST.

AATI Action
Install 1 soil boring at the location of the former waste oil AST. The boring will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, semi-volatiles, PAH, total petroleum hydrocarbons (TPH) and total metals.

Estimated Cost $1,500

Building No. 47 Warfield Private Hanger

Potential Environmental Concern
1) Stained soil was observed in the drainage ditch adjacent to the north end of this building.

4/24/98 Observations
No staining was observed. The impacted area in Photo # 39 appear to be related to standing water, not petroleum spillage.

AATI Action
None

Building No. 48 Mercury Air FBO Terminal, Hanger and Maintenance Shop

Potential Environmental Concern
2) Minor soil staining was observed in the grassy area behind the fuel truck parking area.

4/24/98 Observations
Several (4-5) small areas of fuel staining were observed behind the fuel truck parking area at this facility. The areas were approximately 2' in diameter and less than 6" deep.
In addition, waste fuel drums were observed in this area.

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Building No. 51 E.U.A. Air Support Hanger and Maintenance Hanger

Potential Environmental Concern
2) Stained rock and soil were observed outside along the south end of the building.

4/24/98 Observations
An area approximately 6' in diameter was observed to be stained in the rocks next to the south wall of this building. The impact did not exceed 2" in depth.

AATI Action
None

Building No. 58 Addison Aviation Services Hanger and Maintenance Shop

Potential Environmental Concern
4) The soils in one area of their apron appears stained. A concrete pad was previously located in this area and was used to park their fuel truck.
The spill incident records indicate that several fuel spills have occurred on this ramp.

4/24/98 Observations
All stains were contained on the asphalt.

Construction is currently underway at the location of the former fuel truck parking area. The surface soils have been moved. It is not possible to locate those soils that were previously present or stained. The site will be covered with concrete pavement.

AATI Action
None

Building No. 59 Domar Leasing Private Hanger

Potential Environmental Concern
2) Fuel staining was observed on their ramp possibly from the Addison Aviation Services fuel truck.

4/24/98 Observations
All stains were contained on the asphalt.

AATI Action
None

Building No. 66 Million Air Hanger and Maintenance Shop

Potential Environmental Concern
2) A soil stain was observed in the grassy area south of this hanger.

4/24/98 Observations
A very minor surface stain was noted at this location. The impacted area shown in Photo # 49 appears to be due to standing water rather than petroleum spillage.

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee perform an environmental assessment of the area.

Building No. 67 Million Air FBO Terminal, Hanger, and Maintenance Shop

Potential Environmental Concern
2) A fuel spill from a fuel truck has previously occurred in the drainage ditch adjacent to the Millionaire facility.

4) Fuel trucks park adjacent to a drainage ditch on the Millionaire facility.

4/24/98 Observations
No visual evidence of the previous fuel spill to the drainage ditch was observed. The fuel truck park adjacent to this drainage ditch.

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the drainage ditch.

Ramp Between Interjet, E.U.A. and Redman Investments

Potential Environmental Concern
According to an interview, a fuel truck spilled 500 gallons of Jet A at this location. It is unclear how much of the fuel was recovered or drained into the grassy areas.

4/24/98 Observations
No visual evidence of the previous fuel spill to this area was observed.

AATI Action
Inform current lessee of the potential environmental concern and subsequent observations. Suggest that the lessee conduct an environmental assessment of the area.

Skyworks Aviation

Potential Environmental Concern
An USEPA document indicated that paint related materials were dumped into the dumpster and on the land surface at this facility.

4/24/98 Observations
No visual evidence of this area was observed.

AATI Action
Install 4 soil borings in the area. The borings will be installed to depths of 6 - 8 ft in an attempt to determine the vertical extent of any soil impact. The vertical extent of the impact will be determined by collecting soil samples at 2 ft intervals from each boring. Soil samples collected from the area will be field screened for volatile constituents with a Photo Ionization Device (PID) and Petroflag Total Petroleum Hydrocarbon (TPH) analyzer. Up to two soil samples (highest PID reading and total depth) will be collected from each of the hand auger borings installed to determine the vertical extent of the impact. The samples will be submitted for laboratory analysis for volatiles, PAH, and total petroleum hydrocarbons

(TPH).

Estimated Cost $7,500

2.5 Suspected Fill Areas

According to the February 1998 Phase I Environmental Site Assessment performed by CDM, suspected fill areas are located at the north and south ends of the main runway and along the western property boundary in several locations. Another suspected fill area was also identified beneath the current Million Air facility. The report further explains that it is believed that some of the fill areas may contain construction debris. The complete contents of the fill in each area are unknown.

In the Phase 1 report, CDM recommends that each fill area be investigated to determine the makeup of the fill material. If fill materials are found, the investigation should be expanded to determine the presence of any soil and groundwater contamination in each area.

As previously discussed, the plan for addressing the potential environmental concerns identified in the Phase 1 report has been prioritized based on the degree of potential impact. The suspected fill areas identified in the Phase 1 report appear not to present a threat to the environment but assessment is needed in order to verify this. Therefore, the assessment activities proposed for the suspected fill areas are Priority 3 activities. The plan and cost estimate have been finalized for the Priority 3 items. These items will be included in the Upkeep Budget request for next fiscal year.

According to airport personnel, a large portion of the airport property contains fill material. Much of the fill was taken from off-site fill areas. Construction debris has also been used periodically since the 1970's. The Town of Addison was aware of and endorsed the use of the construction debris as fill material. In fact, much of the construction debris was generated at Town of Addison construction projects.

Since the suspected fill areas do not present an imminent threat to human health or the environment, the assessment of the areas has been assigned a lower priority. The lower priority items will be included in the Upkeep Budget of the airport for the upcoming fiscal year.

AATI proposes to use a combination of magnetometer survey and subsurface sampling and analyses to assess the suspected fill areas. The suspected fill areas have been divided into three areas, north of the runway, south of the runway, and west of the runway. The same scope of work will be used for each of these areas.

The initial step of the assessment is the use of a magnetometer survey to assess whether subsurface anomalies exist in the areas which could be indicative of buried containers (storage

tanks, drums, etc.). Any metal object such as a storage tank or drum cause magnetic field anomalies that can be detected during a magnetometer geophysical survey. The area to be assessed must be divided into a predefined grid. The magnetometer survey is conducted using a dual sensor proton precession magnetometer. The magnetic field readings are plotted against the grid pattern and contoured to provide a graphical illustration of potential tanks, drums, etc. Once the magnetometer survey is completed, soil borings are advanced in the areas of suspected concerns.

Up to 20 soil borings will be advanced in the areas of potential concern. The borings will be advanced using an auger rig through the fill material into native soils. Representative samples of the fill materials will be logged and recorded. Soil/fill samples will be collected for laboratory analyses for the compounds listed below. Up to five of the soil borings will be converted into groundwater monitor wells. Groundwater samples will be collected and analyzed for the compounds listed below. The monitor wells will be surveyed and groundwater elevations will be recorded.

During the initial assessment, soil and groundwater samples will be analyzed for metals, volatiles, semi-volatiles, pesticides, herbicides, cyanide and phenols. Subsequent sampling should be limited to the areas where contaminants are encountered and only to the compounds detected.

The estimated cost to perform the assessment at a suspected fill area is $65,000. The total cost to assess the three suspected fill areas is $ $195,000.

2.6 Septic Tanks

According to the February 1998 Phase I Environmental Site Assessment performed by CDM, four facilities indicated that they used septic tanks and associated leach fields prior to the installation of the sanitary sewer. It is believed that the sanitary sewer was made available at the airport in the 1960's. CDM further expands this by saying that all facilities that were present prior to the availability of the sanitary sewer must have been connected to septic tanks. Since waste products from maintenance activities could have been disposed of in the septic tank systems for many years, the former septic tanks and associated leach fields present environmental concerns. CDM recommends that a subsurface sampling and testing program be completed to determine the presence of any subsurface contamination in the area of the former septic tanks.

The Phase 1 report identified the following buildings as likely having been connected to septic tank systems:

1. Air Traffic Control Tower
2. Cragin Hanger and Maintenance Shop

3. The Six Hanger and Maintenance Shop
4. 600 Series Hangers
5. Current Omniflight Facility across from Ari Ben Aviator facility
6. Ari Ben Aviator Facility (Old South Terminal)
7. Centerline Aviation Hanger
8. Classic Aviation Hanger and Maintenance Shop
9. Jet 1 and 2
10. Mercury Air Hanger 2 (Across from their main FBO terminal)
11. The Av Group and Skytech Hangers (Former Collins Hangers)

2.6.1 Suspected Septic Tanks on Ground Lease Facilities

Several of the suspected septic tanks are located on ground lease facilities. Therefore the lessee will be requested to conduct an assessment to determine the location and condition of the septic tank and leach field. Those facilities include the following:

Air Traffic Control Tower
Cragin Hanger and Maintenance Shop
The Six Hanger and Maintenance Shop
Current Omniflight Facility across from Ari Ben Aviator facility
Centerline Aviation Hanger
Classic Aviation Hanger and Maintenance Shop
Mercury Air Hanger 2 (Across from their main FBO terminal)

AATI Action
Request that the lessee conduct an assessment to determine the location and condition of the septic tank and leach field.

2.6.1 Suspected Septic Tanks on Non-Ground Lease Facilities

The suspected septic tanks located on non-ground lease facilities include:

600 Series Hangers
Ari Ben Aviator Facility
Jet 1 and 2
The Av Group and Skytech Hangers

As previously discussed, the plan for addressing the potential environmental concerns identified in the Phase 1 report has been prioritized based on the degree of potential impact. The suspected septic tanks identified in the Phase 1 report appear not to present a threat to the environment but

assessment is needed in order to verify this. Any septic tanks at the airport have been in place since the 1960s and have not been in use for a number of years. Therefore, the assessment activities proposed for the suspected septic tanks are Priority 3 activities. The plan and cost estimate have been finalized for the Priority 3 items. These items will be included in the Upkeep Budget request for next fiscal year.

Even though the assessment of suspected septic tanks is a Priority 3 item, the initial steps have already been performed. The initial step in assessing the potential impacts from former septic tank systems is to identify their location. A review of the available construction documents for the referenced facilities were performed. This review did not reveal the locations of any of the suspected former septic tanks and leach fields.

The next step was to perform a field inspection, which was conducted by AATI and their environmental consultants on April 24, 1998. The objectives of the field inspection were to identify any surficial evidence of the potential locations of suspected septic tanks, document the physical surface conditions, and verify that each of the facilities listed are not currently using septic tank systems. The location of former septic tanks could not be identified at any location from the field inspection. The general direction from the facilities that a former septic tank system would have been located was estimated based on current sanitary sewer connections and surface topography. Generally, the ground surfaces in these areas are paved with concrete or asphalt covering. This further restricts the ability to locate any suspected septic tanks.

The remaining portions of this assessment are more timely and costly. Since the former septic tank systems have been present for more than 30 years and have not been in use for a similar length of time, they do not appear to pose an imminent threat to human health or the environment. A lower priority has been assigned to this activity. The lower priority items will be included in the Upkeep Budget of the airport for the upcoming fiscal year.

AATI proposes to use a combination of magnetometer survey and resistivity survey to locate the former septic tanks. Following the location of a septic tank, it will be uncovered to determine the location of its associated leach field. A subsurface investigation will be conducted to determine the impacts of the septic tank and leach field to the environment. The same scope of work will be utilized for each of the 11 facilities listed above.

The initial step of the assessment is the use of a magnetometer survey to assess whether subsurface anomalies exist in the area which could be indicative of a buried reinforced concrete structure such as a septic tank. The reinforcing steel can cause magnetic field anomalies that can be detected during a magnetometer geophysical survey. The area to be assessed must be divided into a predefined grid. The magnetometer survey is conducted using a dual sensor proton precession magnetometer. The magnetic field readings are plotted against the grid pattern and contoured to provide a graphical illustration of location of a septic tank.

In the areas where the magnetometer survey is inconclusive, a resistivity survey will be conducted. The resistivity survey uses the grounds natural resistivity to identify the locations of any voids such as the inside of a septic tank. A grid will be set and the resistivity survey will be conducted. Results from the resistivity survey will be graphed to show the locations of any suspected septic tanks.

Once a septic tank is located by the magnetometer survey or combination of the surveys, the top of the septic tank will be excavated. Examination of the septic tank will assist in locating the associated leach field.

Once the septic tank and associated leach field have been located, a subsurface investigation will be conducted. Three soil borings will be advanced in the area, one at the septic tank and two in the leach field. The borings will be advanced using an auger rig and representative samples of the soil will be logged and recorded. Soil samples will be collected for laboratory analyses for metals, volatiles, semi-volatiles, pesticides, herbicides, cyanide and phenols. One soil boring will be converted into a temporary groundwater monitor well. A groundwater sample will be collected and analyzed for metals, volatiles, semi-volatiles, pesticides, herbicides, cyanide and phenols.

If the laboratory analyses do not encounter any compounds that present a concern, the septic tank will be filled with sand and left in place. If subsurface contamination is encountered, a site assessment will be conducted in accordance with the TNRCC Hazardous and Industrial Waste Section requirements.

The estimated cost to perform the assessment at a suspected septic tank area is $15,000. The total cost to assess the four facilities is $60,000. These costs do not include the cost of any additional assessment or remediation beyond the initial assessment.

2.7 Other Areas

The ESA Report identified several potential environmental concerns that could not be categorized in the previous areas of concern. This section identifies those potential environmental concerns and provides the plan of action to address each.

2.7.1 Hydraulic Lifts

According to the ESA Report, two facilities at the Addison Airport utilize underground hydraulic lifts which have the potential to impact subsurface soil and groundwater in the event of a release of petroleum products. The facilities are the Town of Addison Service Center and the Six Hanger. Properly maintained hydraulic lifts pose a very minimal risk to the environment.

AATI Actions
AATI will request maintenance and repair records from the operators of the hydraulic lifts. The records will be reviewed for any indication of leakage.

Estimated Costs $100

2.7.2 Petroleum Pipeline

According to the ESA Report, an underground petroleum pipeline is located along the railroad tracks adjacent to the southern airport boundary. The report indicated that this petroleum pipeline could pose an environmental concern to the airport property due to its close proximity.

AATI Action
None

3. Costs Summarized

The following table summarizes the estimated costs associated with the activities conducted and planned to be conducted to address the potential environmental concerns identified in the ESA Report. These costs cover the activities needed in order to assess whether the potential environmental concerns are environmental problems. The estimated costs are only those that have or will be incurred in connection with the upkeep of the airport. They do not include any costs incurred by the tenants.

These estimated costs have been prepared using the data that is available at this time. Certain Priority 1 items need to be completed in order to obtain a better understanding of the potential environmental concern. As additional data becomes available, these costs may need to be revised.

These costs do not cover any remediation of any site. Should the assessment activities indicate that remediation is needed, a work plan and cost estimate will be prepared.

Area of Concern	Priority 1 Activities	Priority 2 Activities	Priority 3 Activities
Fuel Storage and Dispensing Operations	$49,500		
Storm Water Management	$50,000		$45,000
Emergency Spill Response Plan	$12,500		
Surface Spills and Stained Soil	$6,000	$44,400	$23,100
Suspected Fill Material	$500		$195,000
Suspected Septic Tanks	$4,000		$60,000
Other Areas	$600		
Contingency (15%)	$18,500	$6,700	$48,500
Total	$141,600	$51,100	$371,600

Addison Airport Action Plan 6-16-98
dated May 19, 1998

Comments

p1. Liability of AATI — they do not admit any

p2. Proper to use Airport Upkeep Budget for the priority items?

p11. Which Site has received closure from TNRCC?

p13. Need a copy of SPCC Plan

p14. Need a copy of SWPPP

p17. Need copy of Emergency Spill Response Plan

p18. Use of upkeep budget to implement plans?

p20. In many cases, AATI will suggest the lesser conduct an environmental assessment of the area or site. Is this strong enough? Can they be made to do it?

p22. Other than fuel farm, this is the most significant concern on the airport. Should be a Priority 1 Site.

p40. Costs Summarized — Not sure what $45K for Priority 3 Storm Water Management is for. I would not spend $195 K on suspected fill areas. I would probably cut back on all on some of the sampling. Suspected Septic tanks should be investigated to be sure no more are in use. If they are, appropriate measure should be taken. Remaining costs look a little high.

J.P.

CDM Camp Dresser & McKee Inc.

consulting engineering construction operations

One Glen Lakes
8140 Walnut Hill Lane, Suite 1000
Dallas, Texas 75231
Tel: 214 346-2800 Fax: 214 987-2017

June 12, 1998

Mr. Jim Pierce, P.E.
Town of Addison
P.O. Box 144
Addison, Texas 75001-0144

Re: Review of Addison Airport Action Plan
Addison Airport
Addison, Texas

Dear Mr. Pierce:

Camp Dresser & McKee Inc. (CDM) has completed our review of the Addison Airport Action Plan that was recently developed by Addison Airport of Texas, Inc. (AATI) to address the environmental concerns identified in the Phase I Environmental Site Assessment (ESA) that was previously completed for the subject property by CDM. Based on our review of the document, we have the following comments concerning the proposed action items discussed in the plan.

Fuel Storage and Dispensing Areas

Registration and Compliance with Technical Standards

In general, CDM agrees with the proposed approach outlined for updating the registration documents for the underground storage tank (UST) systems in use at the airport and bringing the UST systems into compliance with current and upcoming TNRCC technical standards. However, we have the following comments and recommendations concerning these action items.

Registration

CDM recommends that the Town of Addison (Town) obtain a copy of each of the updated registration documents submitted to the Texas Natural Resource Conservation Commission (TNRCC) and any follow-up correspondence that may be submitted for each of the fueling facilities discussed in the Action Plan in the event that a third party review is necessary. Based on the facilities listed in the Plan of Action, and based on CDM's review of TNRCC files and tenant interviews during the Phase I ESA, it appears that there may still be some confusion regarding Facility ID numbers 14509 and 15460. This may have been cleared up during the registration updating process performed by AATI and their consultant; however, CDM would need to review the submitted registration forms to confirm this conclusion.

The reason we think that there may still be some confusion regarding these Facility ID numbers is that the UST that was removed at Monarch Air is not mentioned in the Action Plan under Facility ID number 14509. A UST was removed from this facility, but updated registration documents were not submitted once the tank was removed. Monarch Air showed CDM the registration documents, but it does not appear that they were ever submitted to TNRCC. The registration for this facility also needs to be updated to show that the tank has been removed. The Action Plan states that E.U.A. Air Support operates this facility.

Information reviewed by CDM during the ESA indicated that Monarch Air, not E.U.A, removed this tank. CDM also recommends that the registration documents for the FAA (ATCT) be updated as discussed in the ESA to show that the UST was removed, not closed in place. CDM also recommends that AATI determine if the tanks at the Texas Pro Air facility were ever registered and if the registration documents need to be updated to show that the tanks at this facility were removed.

Technical Compliance Standards

CDM recommends that the Town obtain copies of any deficiency letters that are submitted to the owner/operators by the TNRCC following their inspection of the fueling facilities and any follow up correspondence that may be submitted by the involved parties. We further recommend that the Town request additional information from AATI that addresses the following:

1) How does AATI plan to monitor the operator's progress towards making any necessary upgrades to their fueling systems? How will AATI document that the upgrades are performed? Will AATI inspect the facilities as the upgrades are performed by the tenants or will they rely on the operators to document compliance?

2) Who will review and approve the suggested upgrade or engineering modifications prior to installation? Since there are numerous tank monitoring, release detection and spill prevention systems on the market, it is our opinion that the proposed system modifications should be reviewed and approved prior to installation to assure that they meet with everyones approval.

3) How will AATI acquire all necessary information from tenants in a timely manner?

4) Who will be responsible for staying current with future UST regulations that might be promulgated and who will monitor and assure that future compliance is maintained for these UST systems?

6) How will AATI keep the Town informed concerning the progress made towards compliance in this area?

CDM recommends that the review and oversight of all the proposed upgrades be performed by an independent outside consultant familiar with fuel system design and modification that would be retained by the individual owner/operator, AATI or the Town.

Leaking Petroleum Storage Tank Corrective Actions

In general, CDM agrees with the proposed approach outlined for the assessment of the Leaking Petroleum Storage Tank Corrective Actions that were outlined in the Action Plan. Since the TNRCC is in charge of regulating releases from UST sites, they will direct, review and approve any assessment and/or cleanup work that may be needed at each of these sites. They will also determine when closure, in accordance with regulatory standards, is appropriate. However, CDM has the following comments and recommendations concerning this action item.

CDM recommends that the Town obtain copies of all correspondence and reports that are submitted between the owner/operators and the TNRCC during the investigation, assessment and remediation of these sites. We further recommend that the Town request additional information concerning how

AATI will monitor the operator's progress in performing the assessment and remedial work that may be required at these sites to assure that they are assessed in a timely manner. Information should also be requested that addresses how AATI will keep the Town informed of the progress made concerning the work performed in these areas. Will AATI provide direct oversight of the investigation/assessment work performed by the tenants and/or review the reports submitted to the TNRCC by the tenants?

At a minimum, CDM recommends that all site investigation, assessment and remedial activities initiated at these sites be performed by an independent third party environmental consultant familiar with TNRCC UST regulations and reporting requirements. The Town may also want to consider your own third party review of the reports prepared for submission to TNRCC, oversight of the assessment activities performed by tenants, review of remedial proposals, or limited confirmation sampling around all of the tank systems located in the fuel farm area to assure that the Towns interests are protected. As discussed in the ESA, the Town may also want to consider more stringent cleanup requirements in the fuel farm area since redevelopment of this area for other uses may be planned in the future.

Spill Prevention, Control and Countermeasures Plan (SPCC)

CDM recommends that the Town obtain copies of all correspondence and reports that are submitted between AATI and the regulatory agency. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the development, approval and implementation of this plan. All tenants who operate fuel farms should be provided a copy of the plan and provided with adequate training in regards to the implementation and execution requirements of the plan. CDM recommends that the SPCC plan be developed by a third party environmental consultant/engineer experienced in the development and implementation of these types of spill plans. The Town may also want to consider their own third party review of the SPCC.

Storm Water Management

NPDES Permit Activities

CDM recommends that the Town obtain copies of all correspondence and reports that are submitted between AATI and the regulatory agency. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the revisions to the tenants Notices of Intent and other work performed in this area. CDM recommends that all training sessions and meetings that are held with tenants concerning the NPDES Permit be documented to assure that adequate training is performed concerning the implementation and execution requirements of the plan. CDM recommends that all NPDES permitting activities be performed by a third party environmental consultant familiar with these types of permits. The Town may also want to consider their own third party review of the NPDES permitting activities performed.

SWPPP Activities

CDM recommends that the Town obtain copies of all correspondence and reports regarding the development and implementation of the SWPPP and associated best management practices developed for the airport. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the development, approval, and implementation of the SWPPP. CDM recommends that all tenants be provided with a copy of the plan and all training sessions and meetings held with tenants concerning the SWPPP be documented to assure that adequate

training is performed concerning the implementation and execution requirements of the plan. CDM recommends that the SWPPP be developed by a third party environmental consultant experienced in the development and implementation of these types of plans. The Town may also want to consider their own third party review of the SWPPP.

Aircraft Washing

CDM agrees with the approach outlined in the plan to address aircraft washing. However, we feel that additional information is needed concerning how these requirements will be managed and enforced. This information will likely be provided in the SWPPP.

Floor Drains

CDM recommends that the Town obtain copies of the drainage study performed on the floor drains in the event a third party review is necessary. CDM also recommends that the Town request additional information on how AATI will keep the Town updated concerning the floor drain discharge modifications outlined in the plan.

Exterior Waste/Chemical Storage Areas

CDM recommends the Town request additional information concerning how AATI will monitor and assure compliance in the exterior waste/storage areas. According to the plan, most tenants have now installed proper storage devices for these areas. CDM recommends that additional information be provided to the Town documenting the types and locations of the storage facilities that have been approved by AATI and how they relate to the SWPPP. Will these facilities be inspected by AATI on a regular basis to assure continued compliance? Have the waste materials identified in the ESA been removed? Are the approved waste storage areas covered? Have spill containment devices been installed? CDM also recommends that the Town request additional information on how AATI will keep the Town informed of future inspections, if any, that will be performed in these areas. Once identified, the Town may also want to consider a third party inspection of these storage areas to assure their interests are protected.

Drainage Swales

CDM agrees with the limited sampling plan proposed, however, the exact scope of work to be performed may change as the project progresses. If the Town decides to move forward with this investigation, CDM recommends that the Town obtain copies of all correspondence and reports regarding the investigation of the drainage swales. CDM also recommends that the Town request additional information on how AATI will keep the Town informed of the assessment activities performed in these areas. The Town may also want to consider third party oversight during any testing activities performed in the drainage swales by AATI or their consultant. CDM cannot agree with the proposed costs without additional detailed cost information as further detailed in the Costs Summarized Section of this letter.

Emergency Spill Response Plan

CDM recommends that the Town obtain copies of all correspondence and reports regarding the development and implementation of the Spill Response Plan. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning tenant

compliance and/or noncompliance with the plan. CDM recommends that all tenants be provided with a copy of the plan and that all training sessions and meetings held with tenants concerning the Spill Response Plan be documented to assure that adequate training is performed in regards to the implementation and execution requirements of the plan. CDM recommends that the Spill Response Plan be developed by a third party environmental consultant experienced in the development and implementation of these types of spill plans. The Town may also want to consider their own third party review of the spill plan developed.

Surface Spills and Stained Soils

Priority 1 Sites

See comments in Leaking Petroleum Storage Tank Corrective Actions Section of this letter.

Priority 2 and 3 Sites

General Comments Regarding all Priority 2 and 3 Sites:

CDM recommends that the Town obtain copies of all correspondence and reports regarding any assessment or cleanup performed in the surface spill/stained soils areas. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the assessment and/or cleanup work performed in each of these areas. Additional information also needs to be provided on how tenant follow up and compliance will be handled for tenant sites where AATI will recommend that the tenant perform the environmental assessment. The Town may also want to consider a third party review of reports, oversight of the assessment activities performed by AATI and/or tenants, or limited confirmation sampling to assure that the Towns interests are protected. At a minimum, CDM recommends that all site investigation, assessment and remedial activities initiated at these sites be performed by an independent third party environmental consultant familiar with TNRCC regulations regarding the reporting, assessment and remediation of these types of sites.

Based on the review of the Action Plan, it appears that all of the small aboveground waste oil storage tanks that were previously supplied for individual tenant use by AATI have been removed. Are new plans in place to address waste oil disposal activities by individual tenants? Additional information on these procedures should be requested from AATI.

In general, CDM agrees with the approaches outlined for the investigation and assessment of the spill/stained areas outlined in the plan with the following exceptions.

Building 2 and 3 - Coop Hangers

This environmental concern can probably be classified as a Priority 3 site based on CDM's observations during the ESA.

Building 29 - Walter Fuller Aircraft Sales Hanger and Maintenance Shop

As stated in the Phase I ESA, CDM recommends that a limited surface/subsurface soil assessment be performed in the location of the previous waste oil tank.

Building 31 - All American Aviation and Maintenance Hanger

Since the impacted area between the hangers is small, an alternative approach that the Town might want to consider would include performing the initial limited investigation as proposed, followed by excavation and clearance sampling consistent with what AATI proposed for the COOP Hangers.

Building 4 - 300 Series Hanger

As discussed in the Phase I ESA, CDM recommends limited sampling in hanger 320 where the large fuel spill occurred. Based on photos reviewed, all staining did not appear to be on the impermeable surface.

Building 8 - Skytech Aviation and Maintenance Shop

As discussed in the Phase I ESA, CDM also recommends limited testing beneath the waste oil storage tank at this facility.

Building 19 - Henley's Aircraft Services Hanger and Maintenance Shop

As discussed in the Phase I ESA, CDM recommends limited testing beneath the ramp to determine if the soils have been impacted.

Building No. 58 - Addison Aviation Services Hanger and Maintenance Shop

CDM recommends that limited subsurface testing be performed in these areas as discussed in the Phase I ESA.

Suspected Fill Areas

If the Town decides to move forward with this investigation, CDM agrees with the limited sampling plan proposed, however, the exact scope of work to be performed and associated costs may change as the project progresses. CDM cannot agree with the proposed costs without additional detailed cost information as further detailed in the Costs Summarized Section of this letter.

CDM recommends that the Town obtain copies of all correspondence and reports regarding any assessment or cleanup performed in the fill areas. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the assessment and/or cleanup work performed in these areas. The Town may also want to consider a third party review of reports, oversight of the assessment activities performed by AATI and/or tenants, or limited confirmation sampling to assure that the Towns interests are protected. At a minimum, CDM recommends that all site investigation, assessment and remedial activities initiated in the fill areas be performed by an independent third party environmental consultant familiar with TNRCC regulations regarding the reporting, assessment and remediation of these types of sites.

No information was provided concerning surface fill areas where dumping was observed in the Airfield Operations Area (AOA). Will surface dumping in the AOA be allowed in the future or will policies be developed to assist in preventing further dumping in these areas? If fill will continue, will anyone regulate the materials used as fill? If so, how will this program be managed and what types of fill will be allowed.

Septic Tanks

If the Town decides to move forward with this investigation, CDM generally agrees with the limited sampling plan proposed, however, the exact scope of work to be performed and associated costs may change as the project progresses. CDM cannot agree with the proposed costs without additional detailed cost information as further detailed in the Costs Summarized Section of this letter.

CDM recommends that the Town obtain copies of all correspondence and reports regarding any assessment or cleanup performed in the septic tank areas. CDM also recommends that the Town request additional information on how AATI will keep the Town informed concerning the assessment and/or cleanup work performed in each of these areas. Additional information also needs to be provided on how tenant follow up and compliance will be handled for tenant sites where AATI will recommend that the tenant perform the environmental assessment of the septic tanks. The Town may also want to consider a third party review of reports, oversight of the assessment activities performed by AATI and/or tenants, or limited confirmation sampling to assure that the Towns interests are protected. At a minimum, CDM recommends that all site investigation, assessment and remedial activities initiated at these sites be performed by an independent third party environmental consultant familiar with TNRCC regulations regarding the reporting, assessment and remediation of these types of sites.

Other Areas

Hydraulic Lifts

What will happen if maintenance and repair records are not available for the systems identified? Since other assessment activities are already being recommended by AATI to the tenant in the Six Hanger, it is our opinion that it would be cost effective for the tenant to perform additional limited investigation in the vicinity of the hydraulic lift at the same time to document if a concern exists.

Costs Summarized

Based on the limited information provided in the Action Plan concerning the exact scope of work to be performed and the questions presented in this document, CDM cannot effectively evaluate the investigation/assessment costs presented in this Section of the Action Plan. CDM recommends that the Town decide which specific tasks they would like AATI to begin addressing and request detailed work proposals, schedules and cost estimates for this work. Once the exact scope of work is defined, AATI should be able to develop a detailed cost breakdown for each action item. The cost breakdown should include estimated costs for labor, outside professionals/subcontract and other direct costs that would be required to complete the work, not just an estimated total dollar amount. CDM can then compare these detailed cost breakdowns to industry standards to determine if they are reasonable. The Town may want to consider competitive bidding to assist in keeping costs for this project in check, or having some of the work performed under the direction of the Town so that costs can be more closely monitored by Town staff.

General Comments

CDM recommends that the Town assure that someone is reviewing the qualifications and experience of the environmental consultants that will be used by the tenants and AATI. Since the experience and

qualifications of firms vary widely and this is an important project to the Town, CDM recommends that the qualifications and experience of these firms be closely scrutinized. If their are any discrepancies identified between the recommendations provided in this letter and the original ESA performed by CDM, the recommendations provided in the ESA will govern.

CDM appreciates the opportunity to provide this review to the Town of Addison. If you have any questions regarding this information presented or need any additional information, please phone me at 214-346-2800.

Sincerely,

CAMP DRESSER & McKEE INC.

Ron Hartline, P.E.
Project Manager

RH:kar

TOWN OF ADDISON

LETTER OF TRANSMITTAL

Public Works / Engineering
16801 Westgrove • P.O. Box 144
Addison, Texas 75001
Telephone: (214) 450-2871 • Fax: (214) 931-6643

DATE 6-9-98	JOB NO.
ATTENTION	
RE: Amendment # 1 ESA Contract	

TO Ron Hartline
CDM

GENTLEMAN:

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via _____ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications

☐ Copy of letter ☐ Change order ☐ _____

COPIES	DATE	NO.	DESCRIPTION
1	6-8-98		Amendment 1 Signed by City Mgr

THESE ARE TRANSMITTED as checked below:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval

☒ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution

☐ As requested ☐ Returned for corrections ☐ Return _____ corrected prints

☐ For review and comment ☐ _____

☐ FOR BIDS DUE _____ 19____ ☐ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

COPY TO _____

SIGNED: John Ruer

If enclosures are not as noted, please notify us at once.

TOWN OF
ADDISON

LETTER OF TRANSMITTAL

Public Works / Engineering
16801 Westgrove • P.O. Box 144
Addison, Texas 75001
Telephone: (214) 450-2871 • Fax: (214) 931-6643

DATE 6-9-98	JOB NO.
ATTENTION	
RE: Amendment 1 to Engr. Services Agreement with CDM for Phase I ESA	

TO Carmen Moran

GENTLEMAN:

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via _____ the following items:

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications

☐ Copy of letter ☐ Change order ☐ _____

COPIES	DATE	NO.	DESCRIPTION
1	6-8-98		Original Signed by City Manager

THESE ARE TRANSMITTED as checked below:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval

☒ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution

☐ As requested ☐ Returned for corrections ☐ Return _____ corrected prints

☐ For review and comment ☐ _____

☐ FOR BIDS DUE _____ 19_____ ☐ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

COPY TO _____

SIGNED: Jim Pierce

If enclosures are not as noted, please notify us at once.

CDM Camp Dresser & McKee Inc.

consulting engineering construction operations

One Glen Lakes
8140 Walnut Hill Lane, Suite 1000
Dallas, Texas 75231
Tel: 214 346-2800 Fax: 214 987-2017

June 1, 1998

Mr. Jim Pierce, P.E.
Project Manager
Town of Addison
P.O. Box 144
Addison, Texas 75001-0144

Re: Amendment 1 to Engineering Services Agreement
between Camp Dresser & McKee Inc. and the Town of Addison
for Phase I Environmental Site Assessment Services at Addison Airport

Dear Mr. Pierce:

The Phase I Environmental Site Assessment (ESA) of Addison Airport has been completed by Camp Dresser & McKee Inc. (CDM) in accordance with our previous contract. Since the ESA was completed, Addison Airport of Texas Inc. (AATI) has developed a Plan of Action to address the environmental concerns identified in the ESA. The Town of Addison would now like CDM to review the Plan of Action and provide our comments concerning the proposed assessment, oversight, and management activities discussed in the plan.

To facilitate our review of these documents, CDM will need to amend our current contract upper limit. The labor budget for the previous contract has been expended and will require an amendment to allow CDM to complete the requested services. CDM proposes to review the Addison Airport Plan of Action and provide our comments to each of the proposed action items in a follow up letter to the Town of Addison. CDM has also included one meeting with Town staff upon completion of the review activities. A second meeting has also been included, if needed, with Town staff, AATI and AATI's environmental consultant to discuss any additional information that may be needed or deficiencies identified in the proposed plan.

Project Budget

CDM proposes to increase the upper limit for this project as presented below. All services outlined in this amendment will be performed in accordance with the terms and conditions of our original contract.

Review Action Plan and Compare to ESA Findings (10 hours at $ 90.00/hour)	$ 900.00
Prepare Written Response to Plan of Action (10 hours at $ 90.00/hour)	$ 900.00
Meet with Town of Addison to Discuss Response Findings (4 hours at 90.00/hour)	$ 360.00
If needed, Meet with Town and AATI to Discuss Response Findings (4 hours at $ 90.00/hour)	$ 360.00
Administration/Clerical Services (5 hours at $ 45.00/hour)	$ 225.00
Total Amendment Requested	**$ 2,745.00**

Schedule

CDM proposes to complete the services described in this amendment within 14 days of receipt of written authorization from the Town of Addison.

CDM appreciates the opportunity to provide continued service to the Town of Addison. If you have any questions about this amendment or need any additional information, please phone me at 214-346-2800.

Sincerely,

CAMP DRESSER & McKEE INC.

Ron Hartline, P.E.
Project Manager

C. Hunter Nolan
Vice President

APPROVED:

TOWN OF ADDISON

BY _____ DATE 6-8-98
City Manager

Ron Hartline

6000 Series "Thurgo"

FD connected to Septic Tank

Some rain (ramp) entering —

Install a Sand/oil Trap & Clean quarterly?

5-29-98

Ron Hartline –

can wash airplanes in those hangers

Too late once you find out Heagen disch; could cost a lot of money.

Its all Risk –
How much risk are we able to take?

Repair Hangers & prevent Rain intrusion

Plugging drains is best.

Abut 10 floor drains – big hangers

Wait based on investigation of the Septic – Invest Each field sample
drill rig or geoprobe
Town Ordinance