February 23, 2007

Mary A. Siders, PhD.
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701

for:
Al Phillips the Cleaners, Inc.
3250 West Ali Baba Lane. Suite C-F
Las Vegas, Nevada 89119

Re: **Petition to Modify Groundwater Monitoring Schedule**
Former Al Phillips the Cleaner, Inc.
Maryland Square Shopping Center
3661 South Maryland Parkway, Las Vegas, Nevada

Attn: Dr. Siders

On behalf of Al Phillips the Cleaner, Inc. (Al Phillips), URS Corporation (URS) prepared the following petition to reduce the schedule for routine groundwater monitoring at the above-referenced facility from quarterly to a semiannual basis. Al Phillips requests this reduction because the data to date indicate that monitoring on a semiannual basis is sufficient to track its progress and because the reduction will help Al Phillips fund further assessment and corrective action activities planned for 2007.

A remedial investigation of tetrachloroethene (PCE) contamination in shallow groundwater at 3661 South Maryland Parkway (Maryland Square) in Las Vegas, Nevada has been ongoing since August 2000. Currently, URS performs groundwater monitoring of wells at Maryland Square and submits reports to the Nevada Division of Environmental Protection (NDEP) on a quarterly basis as requested in their letter of December 16, 2004. PCE concentrations for all monitoring wells over the six-year period are shown in Figure 1 and are listed in Table 1. Figure 2 is the concentration contour map from the December 2006 sampling event.

The PCE groundwater concentrations in wells closest to the facility as well as those down-gradient have fluctuated over time with well MW-1 at the former facility and down gradient wells MW-2, MW-3, and MW-6 showing an overall decrease in PCE concentration since groundwater monitoring began in October 2000 (Table 1). Cross-gradient well MW-17 and down-gradient wells MW-4, MW-5, MW-13, MW-14, MW-18, MW-19, MW-20, MW-21, and MW-23 have fluctuating PCE concentrations over time with no notable trend (Table 1). The fluctuation of PCE concentrations in these cross-gradient and down-gradient wells is likely due to migration of the leading edge of the dissolved PCE groundwater plume. The PCE concentrations in the most down-gradient wells MW-25, MW-26, and MW-27 have increased since installation of the wells with the farthest down-gradient well, MW-27, increasing from 220 µg/L in March 2006 to 380 µg/L in December 2006 (Table 1). PCE groundwater concentrations on the edge of the plume (wells MW-7, MW-8, MW-

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10, MW-11, MW-12, MW-15, MW-16, MW-22, and MW-24) have historically remained near or below the Nevada Drinking Water Standards Maximum Contaminant Level of 5 µg/L (Table 1), though MW-11 is no longer sampled due to the presence of floating hydrocarbons previously detected in the well. Monitoring well MW-9 is an intermediate depth well located east of the former facility that has displayed a fluctuation in PCE concentration as high as 670 µg/L in September 2002 and falling to levels as low as non-detect in March 2006 (Table 1).

Groundwater elevation contours from December 2006 are shown in Figure 3. Depth to groundwater historically has varied from 8.71-feet to 26.22-feet across the plume area.

Al Phillips has initiated an investigation of PCE in the soil at the former facility and has committed to conducting additional investigation to evaluate impact to soil vapor off site to the east. These assessment activities are expected to lead to corrective action on the soil at the site which will require significant funds to conduct.

For these reasons, Al Phillips respectfully requests that NDEP authorize a change from a quarterly to semiannual monitoring schedule. Based on the groundwater monitoring data obtained since August 2000 (Table 1), it is evident that PCE groundwater concentrations within the plume fluctuate over time, possibly due to variable groundwater elevation and flow in the area. Transitioning to a semiannual schedule will provide consistent data to evaluate the characteristics of the dissolved PCE plume both on site and off site. This modification will allow the client to manage costs associated with monitoring and remediation at this site as well as four additional Al Phillips sites in the Las Vegas area that are in various stages of corrective action.

Please contact the undersigned at (702) 492–7921 or (702) 324–6664 if there are any questions regarding this petition and out efforts toward environmental restoration at this site. We greatly appreciate your consideration in this matter.

Sincerely,
URS Corporation

Scott Ball

Scott Ball, C.E.M.
Senior Project Manager

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TABLE 1
SELECTEDVOC CONCENTRATIONS IN MONITORING WELLS
Maryland Square Shopping Center

Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
SHALLOW WELLS				
MW-1	Aug 00	2,300	ND	ND
	Oct 00	NS	NS	NS
	Sep 02	2,000	ND	ND
	May 03	870	ND	ND
	Sep 03	2,300	ND	ND
	Nov 03	-	-	-
	Jan 04	1,700	ND	ND
	May 05	3,500	ND	ND
	Sep 05	1,700	ND	ND
	Dec 05	820	ND	ND
	Mar 06	420	ND	ND
	Jun 06	NS	NS	NS
	Oct 06	1,100	ND	ND
	Dec 06	1,300	ND	ND
MW-2	Oct 00	3,000	18	18
	Sep 02	3,000	13	13
	May 03	1,400	ND	ND
	Sep 03	1,700	ND	ND
	Nov 03	-	-	-
	Jan 04	1,700	ND	ND
	May 05	2,050	17	9.7
	Dec 05	2,900	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	1,600	ND	ND
	Oct 06	1,900	ND	ND
	Dec 06	1,300	ND	ND
MW-3	Oct 00	98	ND	ND
	Sep 02	ND	ND	ND
	May 03	6.9	ND	ND
	Sep 03	12	ND	ND
	Nov 03	-	-	-
	Jan 04	6.7	ND	ND
	May 05	ND	ND	ND
	Dec 05	ND	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	ND	ND	ND
	Oct 06	ND	ND	ND
	Dec 06	1.2	ND	ND
MW-4	Oct 00	14	ND	ND
	Sep 02	25	ND	ND
	May 03	24	ND	ND
	Sep 03	100	ND	ND
	Nov 03	-	-	-

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Maryland Square Shopping Center

Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
MW-4	Jan 04	220	ND	ND
	May 05	25	ND	ND
	Dec 05	15	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	27	ND	ND
	Oct 06	NS(1)	NS(1)	NS(1)
	Dec 06	NS(1)	NS(1)	NS(1)
MW-5	Oct 00	100	ND	NS(1)
	Sep 02	110	ND	ND
	May 03	240	ND	ND
	Sep 03	220	ND	ND
	Nov 03	-	-	-
	Jan 04	370	ND	ND
	May 05	146	ND	ND
	Dec 05	93	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	220	ND	ND
	Oct 06	67	ND	ND
	Dec 06	130	ND	ND
MW-6	Oct 00	2,200	13	8.1
	Sep 02	1,000	41	14
	May 03	710	22	ND
	Sep 03	1,300	ND	ND
	Nov 03	-	-	-
	Jan 04	2,400	ND	ND
	May 05	2,090	13	11
	Sep 05	890	13	23
	Dec 05	530	41	21
	Mar 06	NS	NS	NS
	Jun 06	1,100	ND	ND
	Oct 06	1,300	ND	ND
	Dec 06	810	9.9	8.9
MW-7	Sep 02	ND	ND	ND
	May 03	1.7	ND	ND
	Sep 03	2.0	ND	ND
	Nov 03	-	-	-
	Jan 04	11	ND	ND
	May 05	ND	ND	ND
	Sep 05	3.3	ND	ND
	Dec 05	1.2	ND	ND
	Mar 06	1.5	ND	ND
	Jun 06	2.2	ND	ND
	Oct 06	2.9	ND	ND
	Dec 06	2.1	ND	ND

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Maryland Square Shopping Center

Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
MW-8	Sep 02	5.4	ND	ND
	May 03	3.2	ND	ND
	Sep 03	3.7	ND	ND
	Nov 03	-	-	-
	Jan 04	4.7	ND	ND
	May 05	5.6	5.6	ND
	Dec 05	3.6	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	2.6	ND	ND
	Oct 06	3.4	ND	ND
	Dec 06	4.3	ND	ND
MW-10	Sep 02	ND	ND	ND
	May 03	ND	ND	ND
	Sep 03	15	ND	ND
	Nov 03	-	-	-
	Jan 04	ND	ND	ND
	May 05	ND	ND	ND
	Sep 05	ND	ND	ND
	Dec 05	ND	ND	ND
	Mar 06	ND	ND	ND
	Jun 06	ND	ND	ND
	Oct 06	ND	ND	ND
	Dec 06	1.0	ND	ND
MW-11	Sep 02	ND	ND	ND
	May 03	ND	ND	ND
	Sep 03	NS(2)	NS(2)	NS(2)
	Nov 03	NS(2)	NS(2)	NS(2)
	Jan 04	NS(2)	NS(2)	NS(2)
	May 05	NS(2)	NS(2)	NS(2)
	Dec 05	NS(2)	NS(2)	NS(2)
	Mar 06	NS(2)	NS(2)	NS(2)
	Jun 06	NS(2)	NS(2)	NS(2)
	Oct 06	NS(2)	NS(2)	NS(2)
	Dec 06	NS(2)	NS(2)	NS(2)
MW-12	Sep 02	ND	ND	ND
	May 03	1.3	ND	ND
	Sep 03	14	ND	ND
	Nov 03	-	-	-
	Jan 04	6.1	ND	ND
	May 05	ND	ND	ND
	Sep 05	1.1	ND	ND
	Dec 05	1.2	ND	ND

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Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
MW-12	Mar 06	1.1	ND	ND
	Jun 06	NS	NS	NS
	Oct 06	ND	ND	ND
	Dec 06	1.4	ND	ND
MW-13	May 03	2,100	ND	ND
	Sep 03	2,800	ND	ND
	Nov 03	-	-	-
	Jan 04	2,700	ND	ND
	May 05	5,310	ND	ND
	Sep 05	2,600	ND	ND
	Dec 05	3,400	ND	ND
	Mar 06	3,700	ND	ND
	Jun 06	2,900	ND	ND
	Oct 06	2,800	ND	ND
	Dec 06	3,200	ND	ND
MW-14	Nov 03	1,900	ND	ND
	Jan 04	2,100	ND	ND
	May 05	2,920	5.5	ND
	Dec 05	3,400	ND	ND
	Mar 06	2,500	ND	ND
	Jun 06	1,800	ND	ND
	Oct 06	1,900	ND	ND
	Dec 06	3,500	ND	ND
MW-15	Nov 03	5.2	ND	ND
	Jan 04	2.7	ND	ND
	May 05	ND	ND	ND
	Sep 05	3.6	ND	ND
	Dec 05	5.0	ND	ND
	Mar 06	4.5	ND	ND
	Jun 06	4.4	ND	ND
	Oct 06	3.3	ND	ND
	Dec 06	3.7	ND	ND
MW-16	Nov 03	ND	ND	ND
	Jan 04	ND	ND	ND
	May 05	ND	ND	ND
	Sep 05	ND	ND	ND
	Dec 05	ND	ND	ND
	Mar 06	ND	ND	ND
	Jun 06	ND	ND	ND
	Oct 06	ND	ND	ND
	Dec 06	ND	ND	ND
MW-17	May 05	520	ND	ND
	Dec 05	470	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	NS	NS	NS
	Oct 06	1,300	ND	ND
	Dec 06	710	ND	ND

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Maryland Square Shopping Center

Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
MW-18	May 05	1,600	ND	ND
	Sep 05	1,700	ND	ND
	Dec 05	2,400	ND	ND
	Mar 06	1,700	ND	ND
	Jun 06	1,600	ND	ND
	Oct 06	2,100	ND	ND
	Dec 06	1,400	ND	ND
MW-19	Nov 03	1,100	ND	ND
	Jan 04	1,200	ND	ND
	May 05	873	ND	ND
	Dec 05	1,300	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	910	ND	ND
	Oct 06	840	ND	ND
	Dec 06	1,200	ND	ND
MW-20	Nov 03	1,800	ND	ND
	Jan 04	290	2.8	ND
	May 05	1,460	ND	ND
	Dec 05	1,800	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	2,100	ND	ND
	Oct 06	2,000	ND	ND
	Dec 06	2,500	ND	ND
MW-21	Nov 03	51	ND	ND
	Jan 04	55	ND	ND
	May 05	30	ND	ND
	Sep 05	19	2.4	1.5
	Dec 05	16	1.8	1.3
	Mar 06	43	ND	ND
	Jun 06	32	ND	ND
	Oct 06	23	ND	ND
	Dec 06	39	ND	ND
MW-22	May 05	ND	ND	ND
	Sep 05	ND	ND	ND
	Dec 05	1.0	ND	ND
	Mar 06	ND	ND	ND
	Jun 06	ND	ND	ND
	Oct 06	ND	ND	ND
	Dec 06	ND	ND	ND

TABLE 1
SELECTEDVOC CONCENTRATIONS IN MONITORING WELLS
Maryland Square Shopping Center

Well ID	Sample Date	Concentration (in ug/L)		
		perchloroethylene (PCE)	trichloroethene (TCE)	cis-1,2-Dichlorethene
MW-23	May 05	1,430	ND	ND
	Dec 05	1,900	ND	ND
	Mar 06	NS	NS	NS
	Jun 06	1,500	ND	ND
	Oct 06	2,000	ND	ND
	Dec 06	2,100	ND	ND
MW-24	May 05	ND	ND	ND
	Sep 05	4.3	ND	ND
	Dec 05	6.7	ND	ND
	Mar 06	6.5	ND	ND
	Jun 06	5.6	ND	ND
	Oct 06	2.6	ND	ND
	Dec 06	2.6	ND	ND
MW-25	May 05	993	ND	ND
	Sep 05	920	ND	ND
	Dec 05	1,000	ND	ND
	Mar 06	970	ND	ND
	Jun 06	960	ND	ND
	Oct 06	1,300	ND	ND
	Dec 06	1,200	ND	ND
MW-26	Mar 06	730	ND	ND
	Jun 06	770	ND	ND
	Dec 06	1,100	ND	ND
	Oct 06	NS(3)	NS(3)	NS(3)
MW-27	Mar 06	220	ND	ND
	Jun 06	350	ND	ND
	Oct 06	380	ND	ND
	Dec 06	380	ND	ND
INTERMEDIATE WELL				
MW-9	Sep 02	670	ND	ND
	May 03	59	ND	ND
	Sep 03	9.2	ND	ND
	Nov 03	-	-	-
	Jan 04	10	ND	ND
	May 05	353	ND	ND
	Sep 05	64	ND	ND
	Dec 05	190	ND	ND
	Mar 06	ND	ND	ND
	Jun 06	NS	NS	NS
	Oct 06	160	ND	ND
	Dec 06	45	ND	ND

NOTES: ND = None Detected. NS = Not Sampled. ' - ' cells indicate no data available.
(1) = Monitoring Well MW-4 was not sampled due to blockage in well casing
(2) = Monitoring Well MW-11 was not sampled due to detection of floating hydrocarbons in the well.
(3) = Monitoring Well MW-26 was not sampled due to landscape rock covering well.
ug/L = micrograms per liter.
PCE is perchloroethylene (tetrachloroethene). The Maximum Contaminant Level for PCE in drinking water is 5 ug/L.

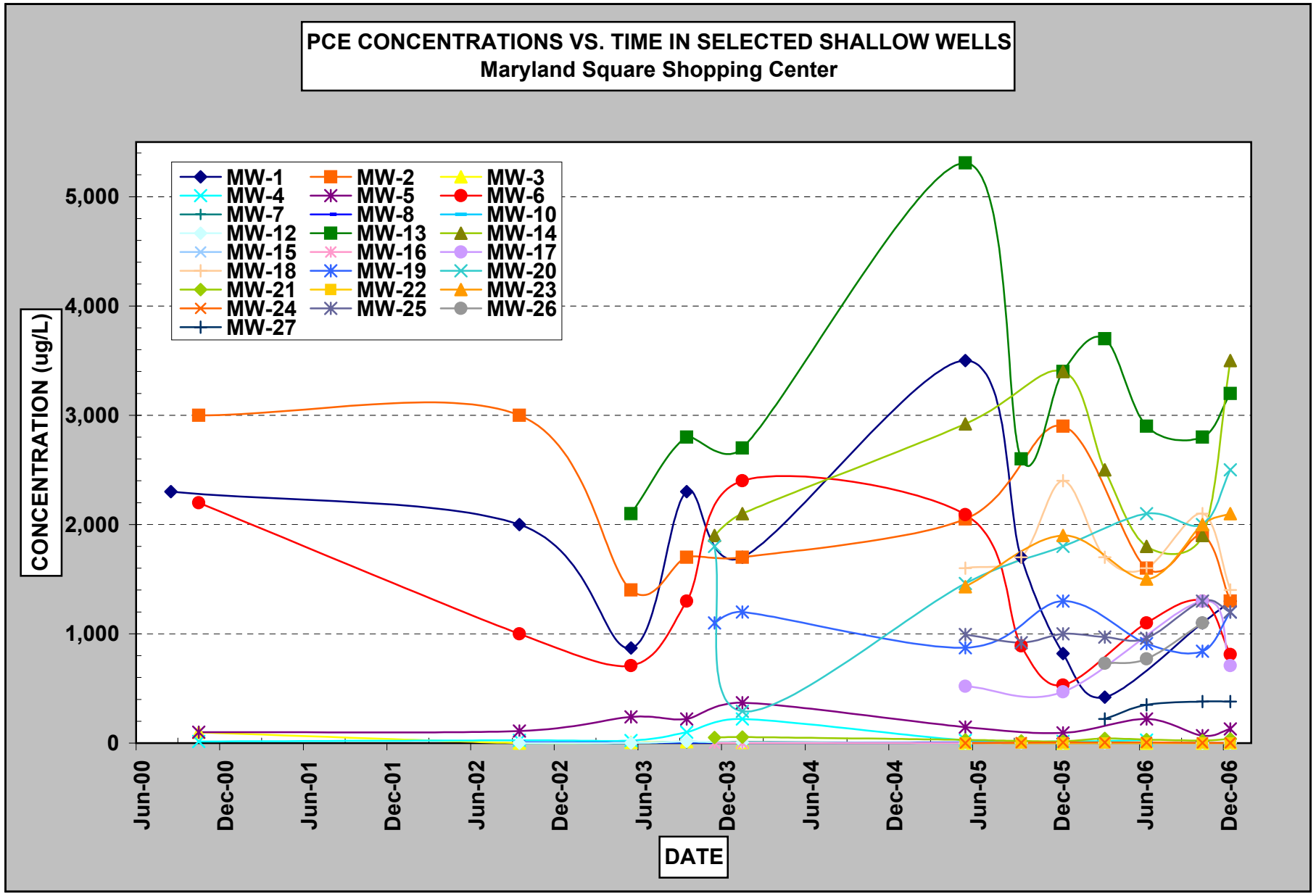
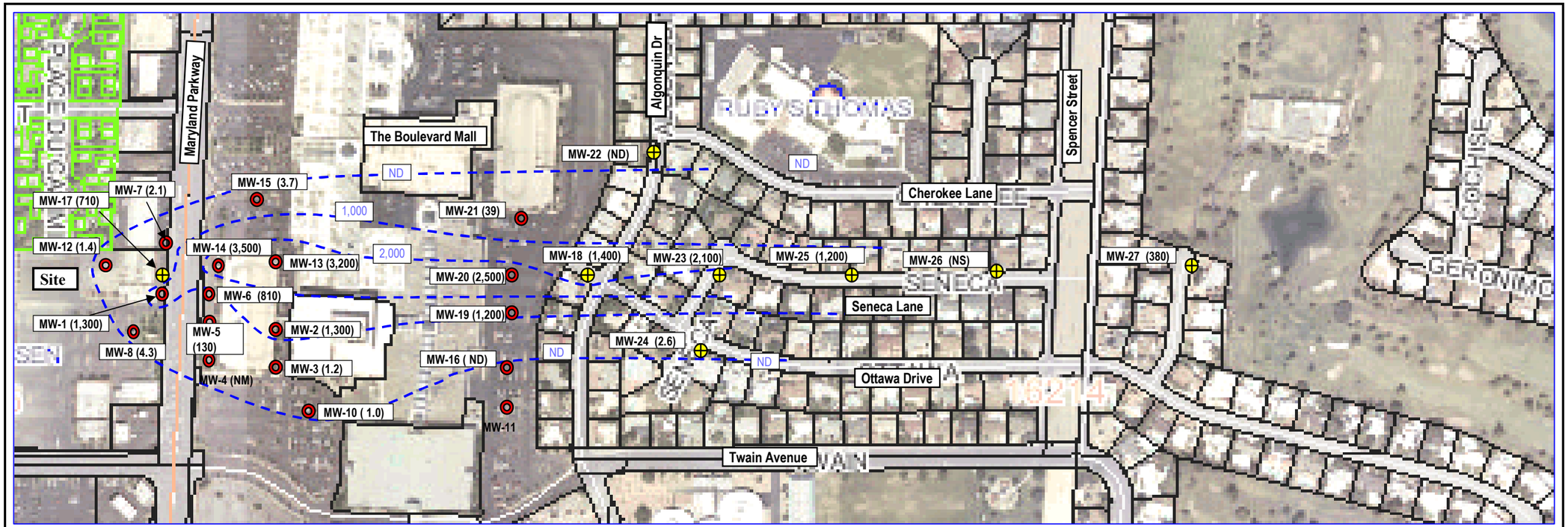

PCE CONCENTRATIONS VS. TIME IN SELECTED SHALLOW WELLS
Maryland Square Shopping Center
MW-1
MW-2
MW-3
MW-4
MW-5
MW-6
MW-7
MW-8
MW-10
MW-12
MW-13
MW-14
MW-15
MW-16
MW-17
MW-18
MW-19
MW-20
MW-21
MW-22
MW-23
MW-24
MW-25
MW-26
MW-27
CONCENTRATION (ug/L)
5,000
4,000
3,000
2,000
1,000
0
Jun-00
Dec-00
Jun-01
Dec-01
Jun-02
Dec-02
Jun-03
Dec-03
Jun-04
Dec-04
Jun-05
Dec-05
Jun-06
Dec-06
DATE

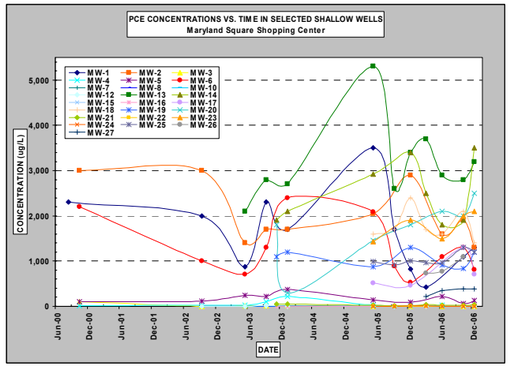
Figure 1



Concentrations of PCE in Monitoring Wells (4th Quarter 2006)

Well	Concentration	Well	Concentration	Well	Concentration
MW-1	1,300	MW-12	1.4	MW-22	ND
MW-2	1,300	MW-13	3,200	MW-23	2,100
MW-3	1.2	MW-14	3,500	MW-24	2.6
MW-4	NS	MW-15	3.7	MW-25	1,200
MW-5	130	MW-16	ND	MW-26	NS
MW-6	810	MW-17	710	MW-27	380
MW-7	2.1	MW-18	1,400	Intermediate Well	
MW-8	4.3	MW-19	1,200	Well	Concentration
MW-10	1.0	MW-20	2,500	MW-9	45
MW-11	NS	MW-21	39		

Concentrations are in micrograms per liter (ug/L). Federal MCL for PCE in drinking water is 5 ug/L. NS = Not Sampled, ND = non-detect.



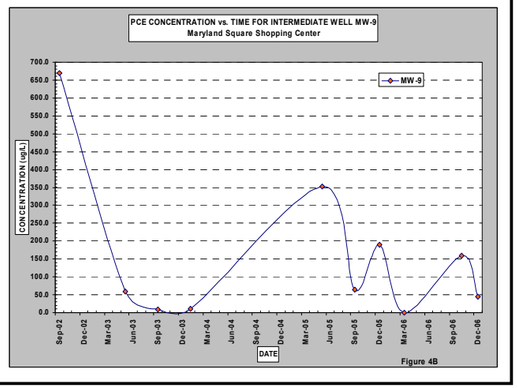


Figure 4B

Source: Clark County Assessors Web Site
Scale: 0Feet — 200 Feet

Legend:

- Approximate Location of Monitoring Well Installed by URS.
- Approximate Location of Monitoring Well Installed by Converse.
- (25) Concentration of PCE Detected in Groundwater Form Monitoring Well (in ug/L)
- Approximate Concentration Contour of PCE in Groundwater

ND is Non-detect, NS is Not Sampled

URS

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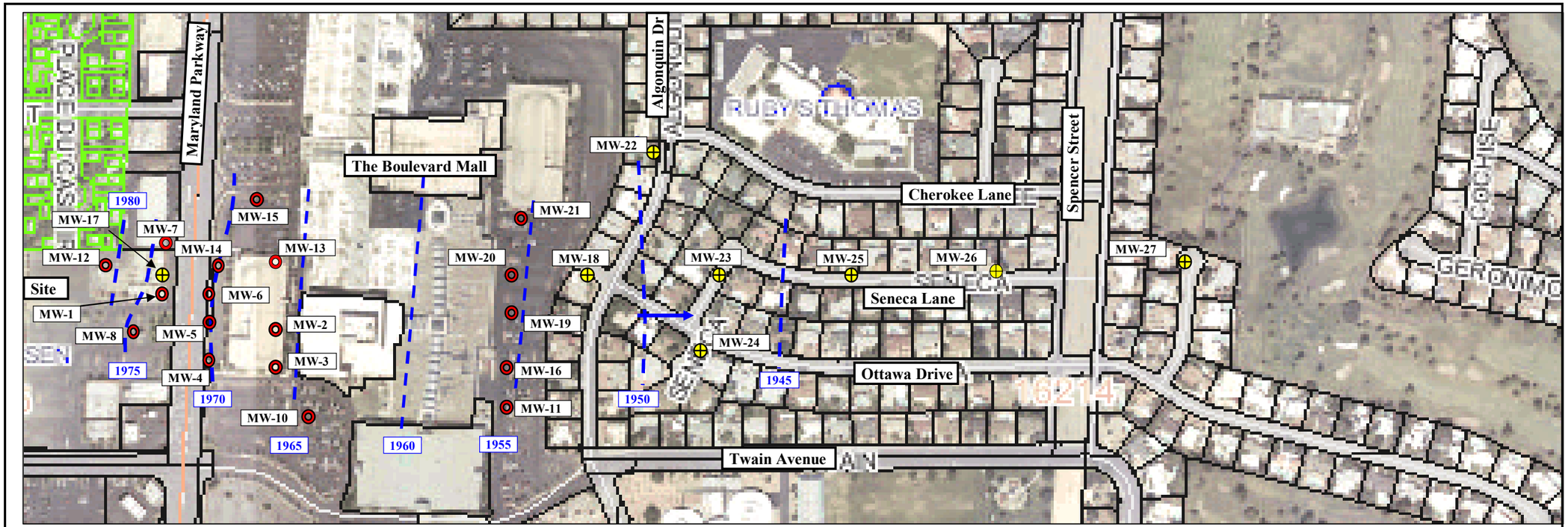
SHALLOW MONITORING WELL PCE CONCENTRATIONS AND CONTOURS

Semiannual Sampling Request
Al Phillips The Cleaner
Quarterly Groundwater Sampling
Maryland Square Shopping Center
3661 South Maryland Parkway
Las Vegas, Nevada

Semiannual Sampling Request
Job No. 26698724

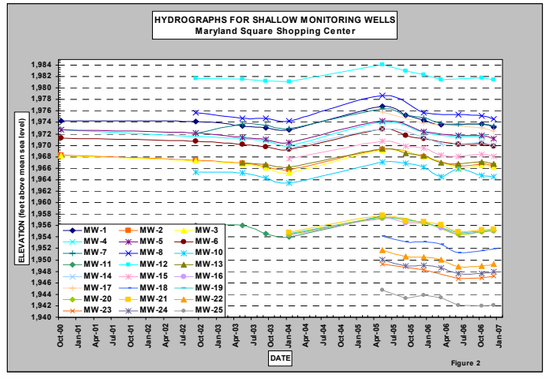
FIGURE 2



Groundwater Elevations In Monitoring Wells (4th Quarter 2006)

Well	Elevation	Well	Elevation	Well	Elevation
MW-1	1973.16	MW-12	1981.45	MW-22	1949.27
MW-2	1966.37	MW-13	1966.73	MW-23	1947.16
MW-3	1966.17	MW-14	1970.11	MW-24	1947.94
MW-4	NM	MW-15	1968.11	MW-25	1942.13
MW-5	1971.17	MW-16	1955.07	MW-26	*
MW-6	1969.83	MW-17	1972.51	MW-27	*
MW-7	1973.38	MW-18	1951.89	Intermediate Well	
MW-8	1974.63	MW-19	1955.25	Well	Elevation
MW-10	1964.59	MW-20	1955.14	MW-9	1973.26
MW-11	NM	MW-21	1955.41		

Elevations are feet above means sea level. NM = Not Measured. * = Installed in March 2006, to be surveyed 1st Qtr. 2007.



Source: Clark County Assessors Web Site
Scale: 0Feet — 200 Feet

URS

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Legend:

- Approximate Location of Monitoring Well Installed by URS.
- Approximate Location of Monitoring Well Installed by Converse.
- Groundwater Elevation Contour Line
- Approximate Direction of Groundwater Flow

GROUNDWATER ELEVATION CONTOURS FOR SHALLOW WELLS

Semiannual Sampling Request
Al Phillips The Cleaner
Quarterly Groundwater Sampling
Maryland Square Shopping Center
3661 South Maryland Parkway
Las Vegas, Nevada

Semiannual Sampling Request
Job No. 26698724

FIGURE 3