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Mr. Randall Jackson
Health, Safety, Env. Director
DCI Management Group
4510 W. 63rd Terrace
Prairie Village, KS 66208

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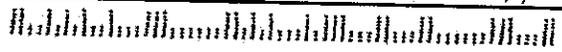
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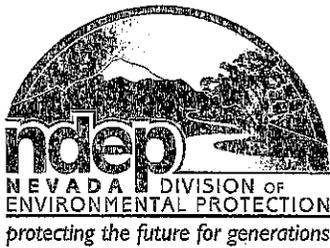
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ENVIRONMENTAL PROTECTION

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STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF CORRECTIVE ACTIONS

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Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

February 27, 2007

Mr. Randall Jackson
Health, Safety & Environmental Director
DCI Management Group Ltd.
4510 W. 63rd Terrace
Prairie Village, KS 66208

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

7005 0390 0002 0502 4287

Subject: **Groundwater Data from Golf Course Well PW-1**

Facility: Maryland Square Site, 3661 S. Maryland Parkway
Las Vegas, Nevada

Facility ID: H-000086

Dear Mr. Jackson:

This letter is to inform you of additional analytical data recently received from the Las Vegas National Golf Course (attached). The General Counsel of the American Golf Corporation (AGC) provided the Nevada Division of Environmental Protection (NDEP) with analytical results for the golf course well known as Well PW-1. This well is an irrigation well screened from 500 to 750 feet below ground surface (bgs), and is also known as Division of Water Resources (DWR) Well #5675.

Tetrachloroethylene (PCE) was detected in Well PW-1 as early as 1990, at a concentration of 8.1 micrograms per liter ($\mu\text{g/L}$). Other detected concentrations include 130 $\mu\text{g/L}$ in 2002, 120 $\mu\text{g/L}$ in 2003, and 5.6 $\mu\text{g/L}$ in 2004. The sampling date and pumping conditions at the time these samples of deep groundwater were collected are unknown by NDEP at present. The variation in concentrations seen in the golf course well may reflect the timing and depth of sampling rather than indicating a trend of increasing or decreasing concentrations. Apparently none of the other wells on the golf course were found to contain concentrations of PCE that exceeded the action level of 5 $\mu\text{g/L}$. The Southern Nevada Water Authority (SNWA) also collected a groundwater sample from Well PW-1 on February 14, 2006 and found 4.9 $\mu\text{g/L}$ PCE in the sample.

The most-easterly well in the Facility H-000086 monitoring well network is Well MW-27, which is located in the cul-de-sac of Ottawa Circle, about 215 feet west of golf course Well PW-1. Concentrations of PCE detected in groundwater samples collected from MW-27 have ranged from 220 $\mu\text{g/L}$ (March, 2006) to 380 $\mu\text{g/L}$ (December, 2006).

The data indicate that the PCE plume may have reached the golf course as early as 1990. Considering that Al Phillips the Cleaners (APTC) in the Maryland Square Shopping Center opened in 1969, PCE appears to have started leaking from the inception of business at APTC. The relatively high hydraulic gradient (0.045 ft/ft) reported for the shallow aquifer may have facilitated travel of the contaminant plume laterally about 3,300 feet in 20 years. The golf course irrigation well sits directly in the flow path of the plume and pumps as much as 8 million gallons per week in the summer season, and has likely drawn the PCE into the well.

The golf course confirmed that they have never used PCE during their operations and the APTC plume is the only known source of PCE in the area. Other PCE sites in this area of Las Vegas have much smaller plumes that have not migrated more than a few hundred feet. Volumetric estimates of PCE mass in the dissolved-phase

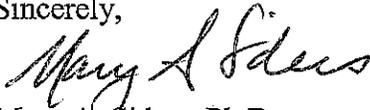


of the APTC plume indicate as much as 800 pounds (about 80 gallons) of PCE in solution. The amount of PCE remaining in onsite soils will be estimated when the new data for the onsite characterization are received.

The high concentrations of PCE measured in two of the five samples collected from Well PW-1 are a concern. Based on this new information, additional downgradient characterization of the plume will likely be needed. However, the NDEP's priorities remain (1) source removal and (2) soil gas sampling and evaluation of the potential for vapor intrusion at residences to the east of Boulevard Mall, followed by (3) additional characterization and management of the dissolved-phase PCE plume in downgradient dissolved groundwater.

Please contact me at (775) 687-9496 or msiders@ndep.nv.gov if you have any questions regarding this letter.

Sincerely,



Mary A. Siders, Ph.D.
Bureau of Corrective Actions
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701

Enclosure (Las Vegas National Golf Course Correspondence)

cc: w/o enclosure

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Mr. Malcolm Weiss, Jeffer, Mangels, Butler & Marmaro LLP, 1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067