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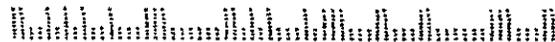
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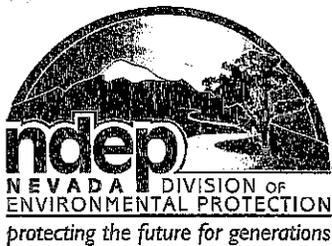
3173
ENVIRONMENTAL PROTECTION
BUREAU OF CORRECTIVE ACTIONS
901 S. STEWART ST.
CARSON CITY, NV 89701
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MAR 07 2007

ENVIRONMENTAL PROTECTION

MS-BCA-H-0086





STATE OF NEVADA

Department of Conservation & Natural Resources

Jim Gibbons, Governor

Allen Biaggi, Director

DIVISION OF ENVIRONMENTAL PROTECTION BUREAU OF CORRECTIVE ACTIONS

Leo M. Drozdoff, P.E., Administrator

P: 775.687.9368 F: 775.687.8335

March 1, 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 4270

Subject: **Frequency of Groundwater Monitoring**
Facility: Maryland Square Site, 3661 S. Maryland Parkway
Las Vegas, Nevada

Facility ID: H-000086

Dear Mr. Jackson:

This letter is in response to your request to reduce the frequency of groundwater monitoring from quarterly to semi-annually for the Maryland Square facility (H-000086). The letter cites "6 years of quarterly data;" however, because wells were installed over a period of about 6 years, some wells have fewer than two years of data. Wells MW-26 and MW-27 are described by data for only 3 to 4 samples (quarterly samples for 2006).

The letter requesting the change in monitoring frequency states that "down gradient wells MW-2, MW-3, and MW-6 show an overall decrease in PCE concentration since groundwater monitoring began in October 2000." However, statistical tests conducted by the Nevada Division of Environmental Protection (NDEP) show that only the data for MW-3 show a statistically significant decrease at the 90% confidence level; concentrations of tetrachloroethylene (PCE) in MW-2 show a statistically significant decrease at the 80% confidence level; and concentrations in MW-6 are stable (based on Mann-Kendall test).

The letter goes on to state that "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." Again, results from the Mann-Kendall test show that this statement is not accurate: Concentrations of PCE in wells MW-20 and MW-23 show statistically significant trends of increasing concentrations at a high level of confidence (>95%). The remainder of the wells show no statistically significant trends in concentrations at the 90% confidence level; however wells MW-13, MW-25, and MW-27 show statistically significant increasing trends at a lower confidence level (80%), and well MW-24 shows a statistically significant decreasing trend at the 80% confidence level.

Based on an evaluation of the range of concentrations, trends, and locations of the monitoring wells, the NDEP has concluded that 17 of the wells may be converted to semi-annual monitoring, because the concentrations are stable or decreasing (based on the Mann-Kendall test) or because the concentrations of PCE are relatively low or nondetect. However, 10 of the wells must remain on a quarterly monitoring schedule because concentrations are increasing (Mann-Kendall test) or the overall number of samples is less than 8 or the concentrations are relatively high (e.g., 3,500 µg/L for the December, 2006 sample from well MW-14). These 10 wells include MW-13, MW-14, MW-17, MW-18, MW-19, MW-20, MW-23, MW-25, MW-26, and MW-27.



The following table summarizes the results of the Mann-Kendall statistical test for trend, the number of samples collected, and the revised monitoring status for the well. Note that water levels should continue to be measured quarterly for all 27 monitoring wells.

Results of Mann-Kendall Test for Trend.

Well ID	Trend at 90% Confidence?	Trend at 80% Confidence?	Number of Detections/Samples	Sampling Frequency	Water Level Measurements
MW-1	Decreasing	Decreasing	11 / 11	Semi-annual	Quarterly
MW-2	No	Decreasing	10 / 10	Semi-annual	Quarterly
MW-3	Decreasing	Decreasing	5 / 10	Semi-annual	Quarterly
MW-4	Indeterminate	Indeterminate	8 / 8	Semi-annual	Quarterly
MW-5	No	No	10 / 10	Semi-annual	Quarterly
MW-6	No	No	11 / 11	Semi-annual	Quarterly
MW-7	No	No	9 / 11	Semi-annual	Quarterly
MW-8	No	No	9 / 9	Semi-annual	Quarterly
MW-9	Indeterminate	Indeterminate	9 / 10	Semi-annual	Quarterly
MW-10	*	*	2 / 11	Semi-annual	Quarterly
MW-11	*	*	0 / 2	Semi-annual	Quarterly
MW-12	Indeterminate	Indeterminate	7 / 10	Semi-annual	Quarterly
MW-13	No	Increasing	10 / 10	Quarterly	Quarterly
MW-14	No	No	8 / 8	Quarterly	Quarterly
MW-15	No	No	8 / 9	Semi-annual	Quarterly
MW-16	*	*	0 / 9	Semi-annual	Quarterly
MW-17	No	No	4 / 4	Quarterly	Quarterly
MW-18	No	No	7 / 7	Quarterly	Quarterly
MW-19	No	No	7 / 7	Quarterly	Quarterly
MW-20	Increasing	Increasing	7 / 7	Quarterly	Quarterly
MW-21	No	No	9 / 9	Semi-annual	Quarterly
MW-22	*	*	1 / 7	Semi-annual	Quarterly
MW-23	Increasing	Increasing	5 / 5	Quarterly	Quarterly
MW-24	No	Decreasing	6 / 7	Semi-annual	Quarterly
MW-25	No	Increasing	7 / 7	Quarterly	Quarterly
MW-26	*	*	3 / 3	Quarterly	Quarterly
MW-27	No	Increasing	4 / 4	Quarterly	Quarterly

Notes:

Results from Mann-Kendall test for trend at 90% and 80% confidence levels:

* indicates that statistical testing was not conducted due to low rate of detection or fewer than four samples collected.

The Mann-Kendall test for trend is available as free software from the Washington State Department of Ecology, and can be used to analyze as many as 16 sampling events: http://www.ecy.wa.gov/programs/tcp/policies/pol_main.html

Mr. Randall Jackson
DCI Management Group, Ltd.
March 1, 2007
Page 3 of 3

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

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, Nevada 89701
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