



November 4, 2011

Ms. Mary Siders
Bureau of Corrective Actions
Nevada Division of Environmental Protection (NDEP)
901 S. Stewart Street, Suite 4001
Carson City, Nevada 89701

RE: **PROPOSAL FOR CHANGES TO THE GROUNDWATER MONITORING PROGRAM**
MARYLAND SQUARE PCE SITE
3661 SOUTH MARYLAND PARKWAY
LAS VEGAS, NEVADA
FACILITY ID No. H-000086

Dear Ms. Siders:

Based on observed site conditions, NDEP directed a sampling schedule of the site-related groundwater monitoring well network in response to the Converse report titled "Groundwater Monitoring Report, 3rd Quarter 2009, Maryland Square Shopping Center," dated December 22, 2009 (NDEP 2009). Seven quarters of groundwater monitoring data have been collected since this schedule was initially developed, and given the expanded data population and relatively stable concentration trends, consideration to further optimize and streamline data collection and assessment efforts is warranted. Consequently, Tetra Tech, on behalf of the Herman Kishner Trust, respectfully requests the following changes to the groundwater monitoring program at the Maryland Square PCE Site:

- 11 of the 33 monitoring wells (MW-18, MW-19, MW-20, MW-23, MW-25, MW-26, MW-27, MW-30, MW-31, MW-32, and MW-33) are currently sampled each quarter. Quarterly data at these locations is no longer improving the overall understanding of site conditions. Based on the most recent linear regression statistical analysis demonstrated in the Quarterly Groundwater Monitoring Report, 3rd Quarter 2011, dated October 28, 2011, all of these wells, with the exception of MW-27, are decreasing (MW-18, MW-19, MW-20, MW-23, MW-25, MW-30 and MW-32), probably decreasing (MW-26) or exhibit no trend (MW-31 and MW-33). The Mann-Kendall statistical tests generated similar trends where all wells, excluding MW-27, were stable (MW-19, MW-31 and MW-33), probably decreasing (MW-26, and MW-32), or decreasing (MW-18, MW-20, MW-23, MW-25 and MW-30). Given the predominant tendency for concentrations at these locations to be stable or decreasing, semi-annual sampling is requested.
- Concentrations of PCE at MW-28, MW-29, and MW-30 have been below 5 micrograms per liter ($\mu\text{g/L}$) since installation. Therefore, annual sampling at these locations is requested.

The proposed semi-annual and annual sampling schedule is summarized on the following page.

**MARYLAND SQUARE PCE SITE
PROPOSED GROUNDWATER MONITORING SCHEDULE**

Second Quarter	Fourth Quarter
MW-1	MW-1
MW-2	MW-2
MW-5	MW-3
MW-6	MW-5
MW-9	MW-6
MW-13	MW-7
MW-14	MW-8
MW-17	MW-9
MW-18	MW-10
MW-19	MW-11
MW-20	MW-12
MW-23	MW-13
MW-25	MW-14
MW-26	MW-15
MW-27	MW-16
MW-30	MW-17
MW-31	MW-18
MW-32	MW-19
	MW-20
	MW-21
	MW-22
	MW-23
	MW-24
	MW-25
	MW-26
	MW-27
	MW-28
	MW-29
	MW-30
	MW-31
	MW-32
	MW-33

This schedule does not currently accommodate the monitoring schedule assigned to pending groundwater monitoring wells, yet to be installed, and will be revised to reflect additional monitoring requirements after required well construction. Should you have questions or require additional information, please do not hesitate to contact me or Robert Manriquez, Program Manager, at 619.321.6748. Thank you for your time and consideration in this matter.

Regards,



Tamara Pelham
Project Manager
CEM No. 1537, Exp. Sept. 11, 2012
Class A 60505

Enclosure(s) (1) Draft Schedule for Corrective Action Plan for Groundwater

Dist: 1/Addressee
1/Maryland Square Shopping Center, LLC, Herman Kishner Trust, c/o Mr. Tom Vandenburg of Dongell Lawrence Finney LLP
1/General Growth Properties, Inc., Attn: Ms. Lynne Stella