

STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
Colleen Cripps, Ph.D., Administrator

May 29, 2013

Irwin Kishner
Herman Kishner Trust
252 Convention Center Drive, Ste 12A
Las Vegas, NV 89109

Maryland Square, LLC
c/o Franklin H. Levy
Lawson & Weitzen, LLP
88 Black Falcon Avenue
Boston, MA 02210

Maryland Square Shopping Center, LLC
c/o Tim Swickard
Dongell Lawrence Finney LLP
770 L St., Suite 950
Sacramento, CA 95814

SBIC
c/o Jeffrey T. Oberman
Levin & Oberman
361 N. Canon Dr.
Beverly Hills, CA. 90210

Subject: **First Quarter 2013 Groundwater Monitoring and Sampling Report**

Facility: Al Phillips the Cleaner (former)
3661 S. Maryland Parkway
Las Vegas, Nevada
Facility ID: **H-000086**

Dear Messrs. Kishner, Swickard, Levy and Oberman:

The Nevada Division of Environmental Protection (NDEP) received the **First Quarter 2013 Groundwater Monitoring and Sampling Letter Report** prepared by Cardno ATC Associates, Inc. (Cardno ATC) on behalf of the Herman Kishner Trust (Trust) and Maryland Square Shopping Center, LLC (MSSC LLC), dated April 28, 2013 and received in hard copy on May 2, 2013.

Overview of Reported Results

The First Quarter Report provides the analytical data for groundwater samples collected from 56 individual, multi-level and nested wells across the site.

Groundwater samples were collected from new nested wells, which were constructed in borings that were drilled as deep as 121 feet bgs. These deep borings were installed to delineate the vertical extent of the tetrachloroethylene (PCE) plume. This vertical delineation was done in preparation for conducting field pilot tests for possible remedies to clean up the PCE-contaminated groundwater. Analytical data for grab samples of groundwater, collected during drilling of nested wells MW-6D, MW-19D, and MW-20D showed the following concentrations of PCE, in micrograms per liter ($\mu\text{g/L}$):



MW-6D	Depth	32 ft	41 ft	51 ft	65 ft	71 ft	81 ft	91 ft	101 ft	111 ft	121 ft
	µg/L	720	1100	180	150	17	0.76	<0.50	<0.50	0.52	<0.50
MW-19D	Depth	27 ft	36 ft	46 ft	81 ft	101 ft					
	µg/L	810	840	70	<0.50	<0.50					
MW-20D	Depth	56 ft	101 ft								
	µg/L	470	0.52								

Results of the Mann-Kendall trend test presented in the First Quarter Report show increasing concentrations of PCE in wells MW-5, MW-6, MW-7 and MW-27. From the statistical test results, it appears that concentrations of PCE are decreasing or stable in other wells across the extent of the plume.

NDEP Comments

The NDEP observes that the first three pages of Section 1 (Background) are from previous reports and provide a partial list of site documents. It may be more informative to provide a description of site history in several paragraphs rather than a 3-page list of documents. Readers may also be referred to the on-line administrative record available at <http://ndep.nv.gov/pce/foia.htm> for more information about the site.

Section 3 (Summary) of the report provides a lot of numerical data in text format. It may be more informative for the reader if a concise table of results was provided instead, with a brief discussion in the text. See an example table included here as **Attachment 1** to this letter.

The NDEP notes that Section 3.1 (Recommendations) recommends continuing monitoring and sampling with the current schedule. Section 3.1 also proposes locations for three new monitoring wells, with two of these wells to help define the easternmost extent of the plume, and one well on Commanche Drive, north of the elementary school. Well MW-38 is presently the only monitoring well east of Eastern Avenue, so the northern and southern boundaries of the plume are poorly constrained in this area. A well installed north of the school would provide some certainty regarding the northern boundary of the plume in this area.

NDEP Requirements

Table A-I. Please add to this table, a column listing the date of installation for each well.

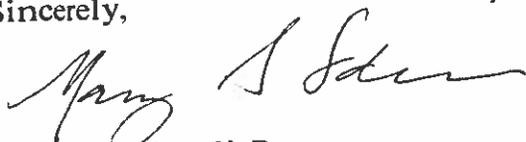
The NDEP concurs with the recommendation to continue to follow the current monitoring sampling schedule.

The NDEP concurs with the recommended locations for the three new monitoring wells. Please provide a schedule for installation of these three wells. These wells are to be installed by **August 30, 2013**.

The Second Quarter 2013 Groundwater Monitoring Letter Report is due by **July 30, 2013**.

If you have any questions or require additional information regarding this letter, contact me by telephone at (775) 687-9496 or e-mail at msiders@ndep.nv.gov

Sincerely,



Mary A. Siders, Ph.D.
Bureau of Corrective Actions
Fax (775) 687-8335

cc: Greg Lovato, Bureau Chief, Bureau of Corrective Actions, NDEP, Carson City, NV
Scott Smale, Supervisor, BCA, NDEP, Carson City, NV
Todd Croft, Supervisor, BCA, NDEP, Las Vegas, NV
Carolyn Tanner, State of Nevada, Office of the Attorney General, 100 N. Carson Street, Carson City, NV
Jasmine Mehta, State of Nevada, Office of the Attorney General, 100 N. Carson Street, Carson City, NV
Ebrahim Juma, Assistant Planning Manager ejuma@cleanwaterteam.com
Joseph R. Leedy, Principal Planner jleedy@cleanwaterteam.com
Dennis Campbell, Southern Nevada Health District campbell@snhdmail.org
Michael Houghtaling, P.E., Senior Engineer, Clark County Department of Development Services, 4701 Russell Rd, Las Vegas, NV 89118 mhoughta@co.clark.nv.us
Lynne S. Stella, Manager of Environmental Services, General Growth Properties, Inc., 110 N. Wacker Drive, Chicago, IL 60606 lynne.stella@ggp.com
Ric Jimenez, General Manager, The Boulevard Mall, 3528 S. Maryland Parkway, Las Vegas, NV 89169
ric.jimenez@ggp.com
Frank A. Bell, Facilities Operations Manager, The Boulevard Mall, 3528 S. Maryland Parkway, Las Vegas, NV 89169
Frank.Bell@rouseproperties.com
Jeffrey R. Diver, P.C., 25741 Crimson King Lane, Glen Ellyn, IL 60137 JeffDiver@comcast.net
David B. Kuhlman, Procopio, Cory, Hargreaves & Savitch LLP, david.kuhlman@procopio.com
Robert G. Russell, Procopio, Cory, Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101
bob.russell@procopio.com
Steven J. Parsons, Law Offices of Steven J. Parsons, 7201 W. Lake Mead Blvd., Suite 108, Las Vegas, Nevada 89128-8354
steve@sjplawver.com
Paul G. Roberts, Vice President and General Counsel, The Interface Group proberts@tigmass.com
Jerry Tidball, Key Golf Management, Las Vegas National Golf Club kgmjerry@yahoo.com
Coy Wood, General Manager, Las Vegas National Golf Course coy@lasvegasnational.com
Tamara Williams, Clark County Community Liaison, 3900 Cambridge Suite #111, Las Vegas, NV 89119
TGW@ClarkCountyNV.gov
Peter Krasnoff, P.E., WEST, Inc., 711 Grand Avenue, Suite 220, San Rafael, CA 94901 peterk@westenvironmental.com
Lisa Medve, P.E., Tetra Tech, 518 17th Street, Suite 900, Denver, CO 80202 lisa.medve@tetrattech.com
James Elliot, P.G., Tetra Tech, 5383 Hollister Ave., Suite 130, Santa Barbara, CA 93111 james.elliott@tetrattech.com

Maryland Square Shopping Center, LLC

Kishner, Swickard, Levy and Oberman

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Steve Bradley, CEM, Tetra Tech, 1230 Columbia Street, Suite 1000, San Diego, CA 92101 steve.bradley@tetratech.com

Andrew Stuart, Senior Project Manager, ATC Associates, 2925 E. Patrick Lane, Suite M, Las Vegas, NV 89120
andrew.stuart@atcassociates.com

cc: Joe Blagg, Project Manager, Diversified Real Estate Group, 4255 Dean Martin Rd, Ste J, Las Vegas, NV 89103

John Griffin, Kaempfer Crowell, 510 W Fourth St., Carson City NV 89703.

John Knott, CBRE, 3993 Howard Hughes Parkway, Suite 700, Las Vegas, NV 89169

Jan Greben, 125 E. De La Guerra St, Ste 203, Santa Barbara, CA 93101-7204

Alexander Robertson, 32121 Lindero Canyon Rd, Ste 200, Westlake Village, CA 91361

Jan Villaire, Coordinator, Environmental Compliance, Safety & Environmental Services, 1700 Galleria Drive, Bldg C, Henderson, NV 89014

Glenn D. Phillips, The Travelers Companies, Inc., SLCU-Suite 160, 4650 Westway Park Blvd., Houston Texas 77041

ATTACHMENT 1

Summary of PCE Concentrations in Monitoring Wells across the Site, 1st Quarter, 2013

ND (<0.5 µg/L)	>0.5 to <5.0 µg/L	5.0 to 7,200 µg/L (ordered by well ID)	>5.0 to 7,200 µg/L (ordered by concentration)	
MW-6D1	MW-8	MW-1	MW-9	6.6
MW-6D2	MW-12	MW-2	MW-38	7.3
MW-6D3	MW-15	MW-3	MW-21	8.4
MW-10	MW-16	MW-5	MW-7	10
MW-11	MW-19D3	MW-6	MW-3	12
MW-16	MW-20D3	MW-7	MW-20D2	25
MW-22	MW-24	MW-9	MW-37	34
MW-29	MW-28	MW-13	MW-40 CMT-35	48
	MW-40 CMT-30	MW-14	MW-31	61
		MW-14I	MW-30	62
		MW-17	MW-20D1	69
		MW-18	MW-36	160
		MW-19	MW-17	170
		MW-19I	MW-19D2	190
		MW-19D1	MW-1	260
		MW-19D2	MW-40 CMT-40	270
		MW-20	MW-40 CMT-50	280
		MW-20D1	MW-39	280
		MW-20D2	MW-20	290
		MW-21	MW-19D1	300
		MW-23	MW-40 CMT-45	310
		MW-25	MW-35	340
		MW-26	MW-40 CMT-55	390
		MW-27	MW-27	450
		MW-30	MW-19	520
		MW-31	MW-5	530
		MW-32	MW-34	550
		MW-34	MW-2	580
		MW-35	MW-25	660
		MW-36	MW-19I	710
		MW-37	MW-32	720
		MW-38	MW-26	740
		MW-39	MW-23	960
		MW-40 CMT-35	MW-18	1,200
		MW-40 CMT-40	MW-40 CMT-60	1,200
		MW-40 CMT-45	MW-13	1,300
		MW-40 CMT-50	MW-14	1,900
		MW-40 CMT-55	MW-6	2,600
		MW-40 CMT-60	MW-14I	7,200

