



October 8, 2012

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

RE: **PROPOSAL FOR CHANGES TO THE PROPOSED PILOT TESTS – ADDITIONAL VERTICAL DELINEATION**  
MARYLAND SQUARE PCE SITE; 3661 SOUTH MARYLAND PARKWAY; LAS VEGAS, NEVADA  
FACILITY ID No. H-000086

Dear Ms. Siders:

Based on preliminary review and assessment of vertical delineation and aquifer test data collected in July and August 2012 and technical discussions with the Nevada Division of Environmental Protection (NDEP) in September and October 2012, Tetra Tech proposes additional investigation to determine the presence of PCE at greater depths and evaluate hydraulic communication across the clay layer encountered at 60 feet bgs. This letter proposes changes to the Work Plan for Bench and Pilot Tests (included as Appendix C of the Draft Corrective Action Plan [CAP] for Groundwater dated June 14, 2011, and the Addendum to the CAP for Groundwater dated August 25, 2011) and the letter sent to NDEP on August 20, 2012.

Vertical delineation work completed at the Boulevard Mall confirms tetrachloroethene (PCE) contamination in groundwater at 60 feet below ground surface (bgs). Therefore, additional investigation to determine the presence of PCE at greater depths and evaluate hydraulic communication across the clay layer is important information needed for selection of a remedy to treat groundwater. Tetra Tech proposes the following changes to the groundwater pilot study for further consideration:

- Install a deep nested well near MW-6 in the western parking lot of the Boulevard Mall. The total depth of the well will be the lesser of: 1) the depth at which the PCE concentration in three consecutive groundwater samples is below 100 micrograms per liter ( $\mu\text{g/L}$ ); or 2) a depth of 200 feet below grade surface (bgs). Groundwater samples will be collected at 10-foot intervals, where changes in lithology are encountered, or in more permeable layers if they are present. If the sample at 200 feet has a PCE concentration greater than 1,000  $\mu\text{g/L}$ , NDEP will be contacted for further counsel and collaboration.
- Increase the total depth of the two nested monitoring wells (MW-P1 and MW-P2) proposed for the pilot tests in the eastern parking lot of the Boulevard Mall. The total depth of the wells will be the lesser of: 1) the depth at which the PCE concentration in three consecutive groundwater samples is below 100  $\mu\text{g/L}$ ; or 2) a depth of 100 feet bgs. Groundwater samples will be collected at 10-foot intervals, where changes in lithology are encountered, or in more permeable layers if they are present.
- Depending on the results of the first three additional vertical delineation wells, if warranted and if possible, install another deep nested well in the Paradise Palms neighborhood. The total depth of the nested well will be the lesser of: 1) the depth at which the PCE concentration in three consecutive groundwater samples is below 100  $\mu\text{g/L}$ ; or 2) a depth of 100 feet bgs. Groundwater samples will be collected at 10-foot intervals below the phreatic surface, where changes in lithology are encountered, or in more permeable layers if they are present. Tetra Tech requests NDEP collaboration to determine the best location for this new well within the Paradise Palms neighborhood.

Wells will be installed with a sonic drill rig to improve recovery and samples will be taken with a discrete depth sampling method. A schedule for proposed field work will be provided as soon as access to the Boulevard Mall property can be contractually secured. In the event that access cannot be secured, Tetra Tech will notify NDEP.

Should you have questions or require additional information, please do not hesitate to contact us 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



Lisa M. Medve, PE  
Project Engineer

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