

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

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

April 30, 2009

Albert Marquis
Marquis & Aurbach,
10001 Park Run Drive,
Las Vegas, NV 89145

Subject: Groundwater Monitoring Report, 1st Quarter 2009, Maryland Square Shopping Center
Facility: Al Phillips the Cleaner (former)
3661 S. Maryland Pkwy
Las Vegas, NV
NDEP ID#: H-000086

Dear Mr. Marquis:

The Nevada Division of Environmental Protection (NDEP) has reviewed the quarterly groundwater monitoring report provided by your environmental consultant, Converse Consultants (Converse), and received on April 22, 2009. The NDEP notes that sampling followed the frequency schedule set forth in the NDEP letter of December 24, 2007, and reiterated on pages 3 and 4 of the *Groundwater Monitoring Report*.

NDEP Comments

The map on Plate 2 shows the plume drawn using only wells sampled during the first quarter, and ignores wells not sampled quarterly. This makes the plume appear to change size and shape from quarterly to semi-annual sampling events.

The second sentence in Bullet 2 of the summary section of the report states that "*Trichloroethene (TCE) was also detected in select wells.*" Because "select wells" is vague, it would be more informative to state that "TCE was detected in two of the ten wells sampled this quarter; at concentrations of 5.2 micrograms per liter ($\mu\text{g/L}$) in MW-18 and 7.2 $\mu\text{g/L}$ in MW-32." In fact, the statement about TCE may be best in a separate bullet, especially considering that the reference for the third sentence is unclear and could be either TCE or tetrachloroethylene (PCE).

The third bullet notes that the plume is "relatively stable." However, the NDEP notes that the Mann-Kendall Trend Test (Appendix D of the *1st Quarter 2009 Groundwater Monitoring Report*) did not include evaluation of wells MW-31 and MW-32, although there is now a sufficient number of groundwater samples (four) to conduct statistical testing.



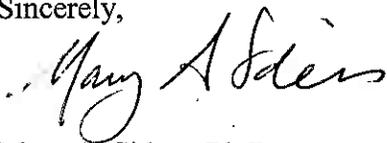
NDEP Requirements

1. The NDEP requests that you conduct statistical testing (at the 90% confidence level) for wells MW-31 and MW-32. The NDEP requests that you continue to conduct statistical analysis of plume stability for all wells with a sufficient number of detected concentrations, and provide the results in each quarterly report.
2. Please use the most recent datum from each well when contouring the PCE plume rather than completely ignoring wells sampled annually and semi-annually (Plate 2 in the *1st Quarter 2008 Groundwater Monitoring Report*). You can show the annual, semi-annual, and the quarterly wells in different colors on the map and note the dates of most recent sampling for each group. Do not simply contour the data from only the monitoring wells sampled quarterly. Please provide electronic and hard copies of the revised plume map no later than **May 15, 2009**.
3. Please provide an electronic copy (pdf file) of the *1st Quarter 2009 Groundwater Monitoring Report*, so that the NDEP can post it on the Maryland Square website: <http://www.ndep.nv.gov/pce/foia.htm>. Submittal of a "print-to-pdf" file is appreciated, because this generates a smaller file than does a scanned pdf file. Please submit this electronic copy to the NDEP by **May 15, 2009**.
4. Please provide quarterly reports on the following schedule:

Groundwater Monitoring Report for Second Quarter, 2009	July 22, 2009
Groundwater Monitoring Report for Third Quarter, 2009	October 22, 2009
Groundwater Monitoring Report for Fourth Quarter, 2009	January 20, 2010

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
Nevada Division of Environmental Protection
Fax (775) 687-8335

cc: Andrea Havens, Converse Consultants, 731 Pilot Road Suite H, Las Vegas, NV 89119
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Mr. Albert Marquis
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