

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

BUREAU OF CORRECTIVE ACTIONS

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April 28, 2008

Mr. Kevin Lyng
DCI Management Group, Ltd.
Chief Executive Officer
11811 N. Tatum Blvd.
Phoenix, AZ 85028

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7007 0220 0003 5225 2526

Subject: Comments on "1st Quarter 2008 Groundwater Sampling Report" (04-14-08)

Facility: Al Phillips the Cleaner (former)
3661 S. Maryland Pkwy
Las Vegas, NV

NDEP ID#: H-000086

Dear Mr. Lyng:

The Nevada Division of Environmental Protection (NDEP) has reviewed the quarterly groundwater monitoring report provided by your environmental consultant, URS Corporation for NDEP case H-000086.

The NDEP notes that four additional monitoring wells (MW-30, MW-31, MW-32, and MW-33) were installed in 2007 and early 2008, to better delineate the eastern extent of the tetrachloroethylene (PCE) plume. The analytical data from the new monitoring wells show that the plume continues its generally eastward migration, with some spreading northward along Spencer Street.

NDEP Comments

The NDEP noted what appears to be an error in Section 3.2, paragraph 3, which states that "...shallow well MW-31 was below the MCL for PCE." Based on the data summarized in Table 3 of this quarterly report, and the analytical report contained in the March 24, 2008 report, well MW-31 contained 49 micrograms per liter ($\mu\text{g/L}$) of PCE; whereas, well MW-33 contained PCE at 2.4 $\mu\text{g/L}$. Please correct this in the next quarterly report.

In Section 4.1, the text states that the plume is approximately 550 feet wide; this is true for the western portion of the plume, but the plume appears wider along Spencer St. just west of the golf course. Please describe and confirm plume geometry in the next quarterly report.

Section 4.1 also mentions the results of the NDEP's trend analysis (Mann-Kendall Test for Trend). The NDEP conducts trend analysis of the revised data set each time new data are added. Results from the most recent trend testing are provided in the following section of this letter.

Figure 5 shows the approximate location of the golf course irrigation well, PW-1. The location is close, but the well is actually slightly to the north of the location shown on the figure. The golf course well is located on the north side of the small outbuilding, and is just about due east of well MW-27.



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NDEP Evaluation of Groundwater Data

The NDEP continues to evaluate changes in PCE concentrations over time, using statistical trend analysis. There are not yet enough quarters of data from the new wells (MW-30, MW-31, MW-32, and MW-33) to conduct trend analysis on these wells; however, all other wells along the plume centerline do have sufficient data for statistical trend analysis. Accordingly, data for six wells (west to east): MW-20, MW-18, MW-23, MW-25, MW-26, and MW-27, were analyzed using the Mann-Kendall test, and evaluated at the 80% and 90% confidence levels. At the 90% confidence level, PCE concentrations are stable in five of the six wells, but are increasing in well MW-27. At the 80% confidence level, PCE concentrations are stable in two wells (MW-20 and MW-23), are decreasing in two wells (MW-18 and MW-25), and are increasing in two wells (MW-26 and MW-27). Output from the trend test is provided here in Attachment 1.

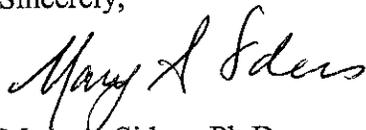
The NDEP notes that data for the first round of low-flow samples (September 2007) were excluded from the trend analysis because those results appear to be anomalously low. Data from all other low-flow samples appear more in keeping with the historical data and were used in the trend testing.

Requirements by the NDEP

The NDEP anticipates receiving the next quarterly monitoring report (2st Quarter, 2008) by **July 30, 2008**. Please notify the NDEP if any delays are encountered that necessitate an extension of this deadline.

If you have any comments or questions please contact the NDEP Case Officer, Mary Siders at (775) 687-9496 or email msiders@ndep.nv.gov.

Sincerely,



Mary A. Siders, Ph.D.
Bureau of Corrective Actions
NDEP Carson City

cc: w/enc

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w/o enc

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Module1: Mann-Kendall Trend Test for Plume Stability (Non-parametric Statistical Test)

Site Name: Maryland Square PCE Site
 Site Address: Las Vegas, NV

Additional Description: _____

Well (Sampling) Location? **MS**
 Level of Confidence (Decision Criteria)? **90%**

1. Monitoring Well Information: Contaminant Concentration at a well: Quarterly sampling recommended.

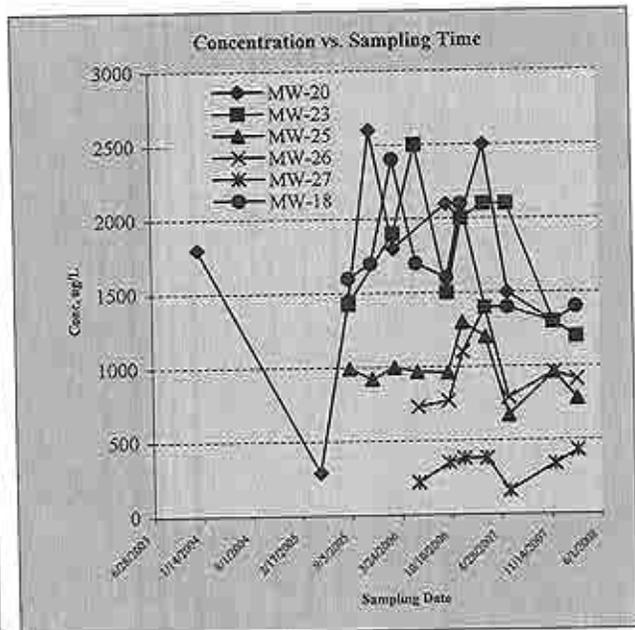
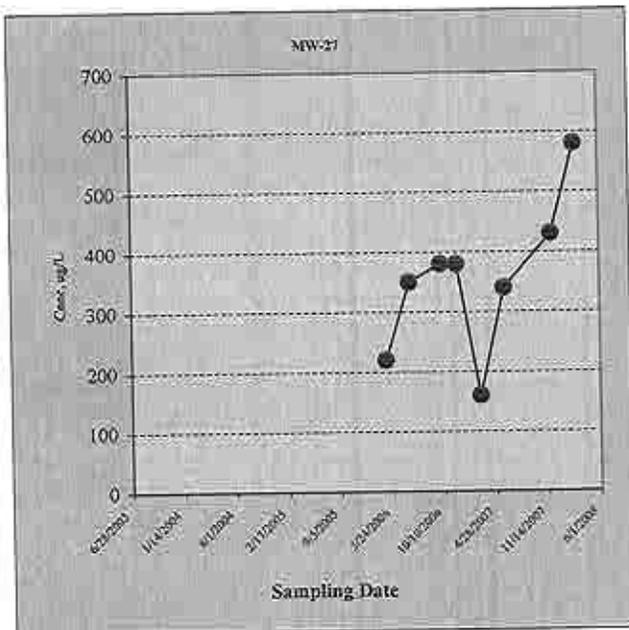
Sampling Event	Date Sampled	Hazardous Substances (unit is ug/L)					
		MW-20	MW-23	MW-25	MW-26	MW-27	MW-18
#1	Nov-03	1800					
#2	Jan-04	290					
#3	May-05	1460	1430	993			1600
#4	Sep-05	2600		920			1700
#5	Dec-05	1800	1900	1000			2400
#6	Mar-06		2500	970	730	220	1700
#7	Jun-06	2100	1500	960	770	350	1600
#8	Oct-06	2000	2000	1300	1100	380	2100
#9	Dec-06	2500	2100	1200	1400	380	1400
#10	Mar-07	1500	2100	670	790	160	1400
#11	Jun-07	1300	1300	960	960	340	1300
#12	Dec-07	1400	1200	780	910	430	1400
#13	Mar-08	1600	1400	890	1100	580	1800
#14							
#15							
#16							

2. Mann-Kendall Non-parametric Statistical Test Results

Hazardous Substance?	MW-20	MW-23	MW-25	MW-26	MW-27	MW-18
Confidence Level Calculated?	58.00%	75.80%	85.90%	86.20%	91.10%	85.90%
Plume Stability?	Stable	Stable	Stable	Stable	<i>Expanding</i>	Stable
Coefficient of Variation?	CV <= 1	CV <= 1	CV <= 1	CV <= 1		CV <= 1
Mann-Kendall Statistic "S" value?	-5	-10	-16	11	13	-16
Number of Sampling Rounds?	12	10	11	8	8	11
Average Concentration?	1695.83	1743.00	967.55	970.00	355.00	1672.73
Standard Deviation?	607.94	432.62	172.73	224.37	127.62	331.94
Coefficient of Variation?	0.36	0.25	0.18	0.23	0.36	0.20
Blank if No Errors found						

3. Temporal Trend: Plot of Concentration vs. Sampling Time

Hazardous substance? **MW-27**
 Plume Stability? **Expanding**



Module1: Mann-Kendall Trend Test for Plume Stability (Non-parametric Statistical Test)

Site Name: Maryland Square PCE Site
 Site Address: Las Vegas, NV
 Additional Description:

Well (Sampling) Location? **MS**
 Level of Confidence (Decision Criteria)? **80%**

1. Monitoring Well Information: Contaminant Concentration at a well: Quarterly sampling recommended.

Sampling Event	Date Sampled	Hazardous Substances (unit is ug/L)					
		MW-20	MW-23	MW-25	MW-26	MW-27	MW-18
#1	Nov-03	1800					
#2	Jan-04	290					
#3	May-05	1460	1430	993			1600
#4	Sep-05	2600		920			1700
#5	Dec-05	1800	1900	1000			2400
#6	Mar-06		2500	970	730	220	1700
#7	Jun-06	2100	1500	960	770	350	1600
#8	Oct-06	2000	2000	1300	1100	380	2100
#9	Dec-06	2500	2100	1200	1400	380	1400
#10	Mar-07	1500	2100	670	790	160	1400
#11	Jun-07	1300	1300	960	960	340	1300
#12	Dec-07	1400	1200	780	910	430	1400
#13	Mar-08	1600	1400	890	1100	580	1800
#14							
#15							
#16							

2. Mann-Kendall Non-parametric Statistical Test Results

Hazardous Substance?	MW-20	MW-23	MW-25	MW-26	MW-27	MW-18
Confidence Level Calculated?	58.00%	75.80%	85.90%	86.20%	91.10%	85.90%
Plume Stability?	Stable	Stable	Shrinking	<i>Expanding</i>	<i>Expanding</i>	Shrinking
Coefficient of Variation?	CV <= 1	CV <= 1				
Mann-Kendall Statistic "S" value?	-5	-10	-16	11	13	-16
Number of Sampling Rounds?	12	10	11	8	8	11
Average Concentration?	1695.83	1743.00	967.55	970.00	355.00	1672.73
Standard Deviation?	607.94	432.62	172.73	224.37	127.62	331.94
Coefficient of Variation?	0.36	0.25	0.18	0.23	0.36	0.20
Blank if No Errors found						

3. Temporal Trend: Plot of Concentration vs. Sampling Time

Hazardous substance? **MW-27**
 Plume Stability? **Expanding**

