



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF CORRECTIVE ACTIONS

P: 775.687.9368 F: 775.687.8335

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

April 8, 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 2533

Subject: Comments on Letter Report, "Installation of Additional Downgradient Groundwater Monitoring Wells" (03-24-08)

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 letter report provided by your environmental consultant, URS Corporation, on the results of new borings and wells installed as part of the on-going environmental investigation for NDEP case H-000086. These additional borings and wells were installed to better delineate the northern and eastern extent of the tetrachloroethylene (PCE) plume of in shallow groundwater.

Summary of Letter Report for Additional Borings and Wells

The letter report states that URS performed the following tasks:

- Drilled and sampled one borehole (B-T2);
- Installed and sampled three new groundwater monitoring wells (MW-31, MW-32, and MW-33);
- Evaluated the groundwater gradient and flow direction in the area of the plume;
- Evaluated the downgradient extent of PCE impact to groundwater based on the additional groundwater analysis;
- Initiated groundwater monitoring for the three new wells;
- Surveyed the elevations of the three new wells;
- Reported findings of the additional groundwater assessment.

The analytical data from the three new monitoring wells show that the PCE plume continues its generally eastward migration, with some spreading northward along Spencer Street, possibly due to lower groundwater gradients in the area of the golf course. It may be that the irrigation of the golf course, and subsequent downward percolation of irrigation water has contributed to the lower gradients in shallow groundwater in the area. At any rate, the NDEP notes that the northern boundary of the PCE plume is south of the intersection of Commanche and Spencer Street, based on data from well MW-33 (2.4 µg/L PCE).



East of the golf course, there are now two wells (MW-30 and MW-31) that indicate significantly lower concentrations (74 and 49 µg/L, respectively) toward the leading edge of the PCE plume. Although we have not yet delineated the eastern extent of the plume, the NDEP does not request any additional monitoring wells at this time. As quarterly data accrue for the new wells (MW-30, MW-31, and MW-32), the NDEP will evaluate plume stability in this region of the PCE plume. Concentrations of PCE in groundwater east of the golf course appear to be sufficiently low to preclude vapor intrusion concerns. However, the NDEP will continue to carefully evaluate all data to assess the behavior of the plume.

Please adhere to the following monitoring schedule for the new wells:

Monitoring Well	Sampling Frequency
MW-30	Quarterly monitoring
MW-31	Quarterly monitoring
MW-32	Quarterly monitoring
MW-33	Semi-annual monitoring

Additional Clarification by the NDEP

The NDEP notes that previous correspondence (see NDEP letters of 10-9-06, 12-18-06, and 2-27-07) stated that source area cleanup was the top priority for the project, whereas, groundwater remediation was the second priority. URS has noted in its quarterly reports since July, 2007 that "...the NDEP is currently reevaluating the remedial approach to the downgradient groundwater contamination and has not authorized implementation of the Source Removal Corrective Action Plan." The NDEP has indeed reevaluated priorities for cleanup, as described in the following paragraph

Since February, 2007, additional data and analysis have changed the NDEP's priorities for remediation at the site. The additional data presented in the Source Area Soil Assessment Report (February 23, 2007) and the additional data collected for soil gas (URS Report, April 13, 2007) indicate that most of the mass of PCE is already in the groundwater. After reviewing these two documents, the NDEP estimated the amount of PCE remaining in source-area soils (20-30 pounds) versus the amount of PCE estimated in the dissolved-phase plume (approximately 800 pounds). The NDEP also performed initial modeling of the groundwater-to-indoor-air intrusion pathway (EPA version of the Johnson-Ettinger model) for the area to the east of Boulevard Mall. Additionally, subsequent data gathered from samples of indoor air from 97 residences and two schools, have substantially altered the priorities for remediation. **The NDEP now considers remediation of offsite groundwater to be the top priority for cleanup of environmental media at the Maryland Square PCE Site; whereas, remediation of source-area soils is now considered the second priority.** Based on this, cleanup of source area soils and implementation of the Source Removal Corrective Action Plan have been put on hold, while the NDEP evaluates remedial options for the groundwater.

However, while cleanup options are being evaluated for groundwater remediation, the NDEP is moving ahead with the installation of home mitigation systems for those homes with indoor air samples containing PCE at concentrations greater than the NDEP action level. The NDEP has evaluated bids from experienced contractors, and will be conducting home evaluations and installing home mitigation systems in the near future. These systems will provide immediate relief for homeowners, while the groundwater undergoes remediation.

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Requirements by the NDEP

The NDEP anticipates receiving the next quarterly monitoring report (1st Quarter, 2008) by April 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:

Greg Lovato, Supervisor, Corrective Actions, BCA, Carson City, NV
Randall Jackson, 9237 Ward Pkwy, Suite 220, Kansas City, MO 64114
William J. Goines, Greenberg Traurig, LLP, Silicon Valley Office, 1900 University Avenue, 5th Floor, East Palo Alto, CA 94303
Albert Marquis, Marquis Aurbach, 10001 Park Run Drive, Las Vegas, NV 89145
Franklin Levy, Maryland Square LLC, 3355 South Las Vegas Boulevard, Las Vegas, NV 89109
Sonja A. Inglin, Jenkens & Gilchrist, LLP, 12100 Wilshire Boulevard, 15th Floor, Los Angeles, CA 90025
Lisa Lowe, URS Corporation, 811 Grier Drive, Suite A, Las Vegas, Nevada 89119
Travis Harmon, Boulevard Mall, 3528 S. Maryland Parkway, Las Vegas, NV 89109
Lynne S. Stella, Manager of Environmental Services, General Growth Properties, Inc., 110 N. Wacker Drive, Chicago, IL 60606
Kelly Webb, Manager, Environmental Services, General Growth Properties, Inc., 10275 Little Patuxent Parkway, Columbia, Maryland 21044
John Knott, CBRE, 3993 Howard Hughes Pkwy, Suite 700, Las Vegas, NV 89169
Kathleen M. Drakulich, Kummer Kaempfer, 5585 Kietzke Ln, Reno, NV 89511
Ebrahim Juma, Clark County Division of Environmental Planning, 500 S. Grand Central Pkwy, 1st floor, P.O. Box 551741, Las Vegas, NV 89155-1741
Dennis Campbell, Southern Nevada Health District, PO Box 3902, Las Vegas, NV 89127
William Frey, State of Nevada, Office of the Attorney General, 100 N. Carson Street, Carson City, NV 89701
Jan Greben, 1332 Anacapa, Suite 110, Santa Barbara, CA 93101
Alexander Robertson, 880 Hampshire Road, Suite B, Westlake Village, CA., 91361