



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

July 31, 2009

Maryland Square Shopping Center, LLC
 c/o Albert Marquis
 Marquis & Aurbach,
 10001 Park Run Drive,
 Las Vegas, NV 89145

Subject: Groundwater Monitoring Report, 2nd 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 *Groundwater Monitoring Report for 2nd Quarter 2009*, provided by the environmental consultant for Maryland Square Shopping Center, LLC, Converse Consultants (Converse), and received via e-mail on July 21, 2009 and hard copy on July 24, 2009.

NDEP Comments

1. The "Sampling Schedule" provided on page 4 of the 2nd Quarter 2009 Report incorrectly indicates that well MW-19 is scheduled for semi-annual sampling. The NDEP's letter of December 14, 2007 contained the following table for sampling frequency, with newer wells added later (MW-31 through MW-33). This table indicates that well MW-19 should be sampled quarterly. Please revise your sampling schedule accordingly.

Sampling Frequency	Monitoring Wells
Discontinue	MW-11
Annual	MW-3, MW-7, MW-8, MW-10, MW-12, MW-15, MW-16, MW-21, MW-22, MW-24
Semi-annual	MW-1, MW-2, MW-4, MW-5, MW-6, MW-9, MW-13, MW-14, MW-17, MW-28, MW-29
Quarterly	MW-18, MW-19, MW-20, MW-23, MW-25, MW-26, MW-27, MW-30; MW-31; MW-32, MW-33

2. There is apparently a blockage in well MW-4. The NDEP notes that groundwater sampled from well MW-4 contained a maximum detected concentration of 220 micrograms per liter (µg/L) of PCE in January, 2004. Please indicate your future plans for this well.



3. Table 3 (pages 9 and 10) provides data on water quality parameters, including turbidity, dissolved oxygen (DO), specific conductance (SC), pH, total dissolved solids (TDS), temperature and oxidation-reduction potential (ORP). The NDEP notes that several readings show "0.0" for turbidity, "0.00" for DO. Please check and confirm that these are correct, or note that the field instrument was not operating properly for these readings.
4. The wording in item 5 of the summary section (page 10) is not technically correct. The text should note that the Mann-Kendall Trend Test is a nonparametric statistical test that is used to evaluate whether there are statistically significant trends in a data set, at a specified level of confidence. Please review guidance document EPA/240/B-06/003 (2006) from the US Environmental Protection Agency (USEPA) (<http://www.epa.gov/quality/qs-docs/g9s-final.pdf>), for further explanation of this statistical test. (See Section 4.3.4 for a discussion of the Mann-Kendall Trend Test).

According to the output provided in Appendix D of the 2nd Quarter Report, at a 90% level of confidence, concentrations of PCE are *decreasing* over time in monitoring wells **MW-1, MW-2, MW-13, MW-14, MW-17, MW-9, MW-20, MW-23, and MW-25**. And, at a 90% level of confidence, concentrations of PCE are *increasing* in monitoring wells **MW-5, MW-6, MW-19, MW-26, MW-27, and MW-32**. Therefore, the summary should note that concentration trends in groundwater sampled at each of these wells showed statistically significant test results at a 90% level of confidence. The remainder of monitoring wells for which PCE concentrations were evaluated did not show statistically significant trends in concentration (i.e., concentrations were deemed stable in these wells).

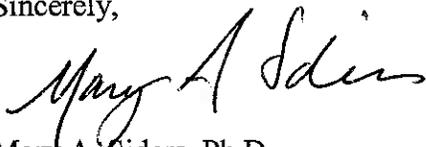
NDEP Requirements

1. Please continue to provide electronic copies (pdf file) of all reports submitted to the NDEP, so that the NDEP can post these 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.
2. Unless a schedule modification is agreed to by the NDEP, please provide future quarterly reports on the following schedule:

Groundwater Monitoring Report for Third Quarter, 2009	October 22, 2009
Groundwater Monitoring Report for Fourth Quarter, 2009	January 20, 2010
Groundwater Monitoring Report for First Quarter, 2010	April 19, 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

Mr. Albert Marquis
H-000086
July 31, 2009
Page 3 of 3

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