



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

August 6, 2013

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Las Vegas, NV 89109

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707 Wilshire Blvd, 45th Floor
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SBIC
c/o Jeffrey T. Oberman
Levin & Oberman
361 N. Canon Dr.
Beverly Hills, CA. 90210

Subject: Second Quarter 2013 Groundwater Monitoring and Sampling Report

Facility: Al Phillips the Cleaner (former)
3661 S. Maryland Parkway
Las Vegas, Nevada
Facility ID: H-000086

Dear Messrs. Kishner, Swickard, Levy and Oberman:

The Nevada Division of Environmental Protection (NDEP) received the **Second Quarter 2013 Groundwater Monitoring and Sampling Letter Report** prepared by Cardno ATC Associates, Inc. (Cardno ATC) on behalf of the Herman Kishner Trust (Trust) and Maryland Square Shopping Center, LLC (MSSC LLC), dated July 26, 2013 and received in hard copy on July 29, 2013.

Overview of Reported Results

The Second Quarter Report provides the analytical data for groundwater samples collected from 33 individual, multi-level and nested wells across the site. The report notes an average decrease in water levels of 0.52 feet compared with the first quarter of 2013, using water-level data for wells measured in both the first and second quarters of 2013. The report also describes a range of oxidation-reduction potentials (ORP) from 2.9 to 606.9 millivolts (mV). This is notable because the range of ORP values needed for significant reductive dechlorination of PCE is approximately -220 to -240 mV. The range of ORP measured for groundwater indicates why no natural degradation of PCE is occurring and why only PCE is present in the plume at 6,000 feet downgradient of the source area.



Results from the Mann-Kendall trend test indicate that concentrations of PCE appear to be decreasing in many wells across the site. The report shows increasing or generally upward trends in concentration for several wells close to the source area (MW-7, MW-5, MW-6 and MW-3), as well as MW-27 and MW-38 (Table 3 and Appendix C in the report).

Analysis of groundwater samples collected downgradient of the pilot testing area in the eastern mall parking lot shows high concentrations of manganese (Mn) related to the injections of the oxidant (potassium permanganate), along with low concentrations of PCE. A groundwater sample collected March 8, 2013 from well MW-19I contained 710 µg/L PCE and no detectable manganese; a sample collected from this well on June 12, 2013 contained no detectable PCE, but did contain 62 milligrams per liter (mg/L) manganese.

NDEP Requirements

The report recommends continued monitoring and sampling of the site monitoring wells; the NDEP concurs with this recommendation, but also requests that site data be reviewed to make recommendations on reducing sampling frequency for some wells. Monitoring should focus on collecting those data are needed to assess effectiveness of the groundwater remedy and demonstrate plume stability (or not). Provide these recommendations, along with justifications for modifying sampling frequency in the next quarterly report or in a separate letter to the NDEP.

The report also requests that the deadline for installing the three additional monitoring wells be extended from August 30, 2013 to September 30, 2013. The NDEP concurs with this extension to **September 30, 2013**.

The NDEP requests that vertical gradients be calculated for nested wells. Provide results of these calculations in the next report.

The Third Quarter 2013 Groundwater Monitoring Letter Report is due by **October 30, 2013**.

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,



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