OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
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August 24, 2022

Dr. Weiquan Dong, P.E. Bureau of Industrial Site Cleanup Nevada Division of Environmental Protection 375 E. Warm Springs Road, Suite 200 Las Vegas, Nevada 89119

RE: Groundwater Monitoring Program Well Relocations Nevada Environmental Response Trust

Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is seeking the Nevada Division of Environmental Protection's (NDEPs) approval to relocate three groundwater monitoring wells and remove one monitoring well from our ongoing groundwater monitoring program. With the growth of the residential communities within Operable Unit 2 (OU-2), NERT must adjust the groundwater well network to accommodate development in accordance with our existing access agreements. Accordingly, NERT is seeking approval to make the following adjustments to the existing groundwater monitoring well network:

- Well ES-2 this well monitored the shallow water table and is screened from 35 to 55 feet below ground surface (bgs) within the alluvium and Upper Muddy Creek Formation (UMCf). The original location is situated within an area of elevated perchlorate concentrations in groundwater (e.g., concentrations >10 mg/L). To allow continued monitoring of groundwater within this area of elevated perchlorate concentrations, NERT recommends reinstalling the well (replacement well ES-2R) slightly to the north of the original location. The proposed location will be in a future residential community and the specific location for the replacement well will be confirmed once final development plans become available and a specific location can be discussed with the property owner.
- Well ES-6 this well monitored the shallow water bearing zone and is screened from 55 to 75 feet bgs within the UMCf. The original location is situated within an area of elevated perchlorate concentrations in groundwater (e.g., concentrations between 1 and 10 mg/L). To allow continued monitoring of groundwater in this portion of the perchlorate plume, NERT recommends reinstalling the well (replacement well ES-6R) slightly west of the original location. The recommended location will be on public right-of-way along a reconfigured Pabco Road, subject to property owner approval. This section of Pabco Road is currently under construction and the replacement well can't be installed until after completion of construction.
- Well ES-7 this well monitored the shallow water bearing zone and is screened from 60 to 80 feet bgs within the UMCf. The original location is situated within an area of lower perchlorate concentrations in groundwater (e.g., concentrations <1 mg/L) between lobes of the perchlorate plume with elevated perchlorate concentrations (e.g., concentrations between 1 and 10 mg/L). To allow continued monitoring of the area between the lobes of the perchlorate plume, NERT recommends reinstalling the well (replacement well ES-7R) slightly northeast of the original location. The recommended locations will be on public right-of-way along what will become an extension of Sunset Road, subject to property owner approval. This section of Sunset Road is currently under construction and the replacement well can't be installed until after completion of construction.

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Well ES-20 - this well monitored the middle water bearing zone well screened from 91 to 111 feet bgs within the UMCf. This location was clearly outside of the eastern edge of the perchlorate plume (e.g. concentrations <15 ug/L). While this well was used in the Remedial Investigation to delineate the extent of perchlorate and chlorate contamination in groundwater in this area, continued monitoring is not necessary to achieve the objectives of the ongoing groundwater monitoring program. As such, NERT does not believe that a replacement well for further monitoring at this location is necessary.

Figure 1 displays the location of the groundwater monitoring wells described above and the proposed location of the replacement wells ES-2R, ES-6R, and ES-7R. If approved, the proposed changes will be incorporated into the Groundwater and Surface Water Monitoring Program Sampling and Analysis Plan, Revision 2 when revised to address NDEP comments on this document.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust

Stephen R. Clough, P.G., CEM

Stephen R. Clough

Remediation Director

CEM Certification Number: 2399, exp. 3/24/23

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Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually

Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually

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