

From: Shannon Harbour
Sent: Wednesday, May 30, 2007 2:55 PM
To: 'Bailey, Keith'; 'Crowley, Susan'
Cc: Brian Rakvica; 'David Gerry'; 'Lisa Bradley'
Subject: RE: Phase A Report: Draft Table 3-2 Review by NDEP
Keith and Susan,

NDEP has reviewed the Draft Table 3-2 for the upcoming Phase A Report. It appears that there a number of errors in the draft Table 3-2 that was provided to the NDEP. The following reflect our comments:

Please verify the following numbers as they appear to be in error:

1. Hexavalent chromium, USEPA MCL – this needs a note to explain what this number signifies.
2. Total chromium, Ind Soil PRG – This value is listed as 4.48E+02. Add rationale if not using this number.
3. Copper – Nevada MCL
4. 1,2-Dibromoethane, Bromodichloromethane, Bromoform, Dibromochloromethane – no USEPA MCL
5. 1,2,3-Trichloropropane: note that the cancer endpoint PRG is listed in table.
6. Uranium 235 and Uranium 238 – footnote indicates that for radionuclides with decay chains, the PRG for the decay chain was used. Check against PRG with decay chain for typos.
7. Chloroform – should note that the MCL is for total trihalomethanes
8. The following PRG values should be checked against the PRG table for typos: Aldrin, Aroclor 1221, Aroclor 1232, Aroclor 1242, Aroclor 1248, Aroclor 1254, Aroclor 1260, ETBE, and MTBE,
9. The following values could not be located in the PRG table: Coumaphos, EPN, Parathion-ethyl, Sulfotepp, Silvex, 4-Chlorotoluene, and Dibromomethane.
10. Xylenes – add (mm) footnote to Industrial Soil PRG and Selected Comparison Level: Industrial Soil PRG columns.

In addition, please make the following changes:

1. As discussed, please add a column that explains the basis for the selected number. The numerous footnotes are cumbersome and do not appear to be used for each number that is presented as the selected comparison value.
2. Add rationale for substitution of a surrogate analyte (e.g. Methyl isobutyl ketone was used as a surrogate for 2-Hexanone due to structural similarity).
3. Nevada has an action level for TPH in soils of 100 mg/kg.
4. Please be advised that Nevada has guidance regarding MTBE that can be provided, if necessary. Please advise.
5. Parathion-methyl is listed as Methyl parathion in the PRG table. Please note.
6. Isopropyl benzene is listed as Cumene (isopropylbenzene) in the PRG table. Please note.
7. Silvex is listed as 2-(2,4,5-Trichlorophenoxy) propionic acid in the PRG table. Please note.
8. Footnote (s): remove “NDEP.” and “to NAC.445A.201” from the reference. Add “Las Vegas Wash” to the reference.

Sincerely,
Shannon

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