



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

12 December 2017

Harry Van den Berg
AECOM, Inc.
1220 Avenida Acaso
Camarillo, CA 93012

Carmen Caceres-Schnell
AECOM, Inc.
1220 Avenida Acaso
Camarillo, CA 93012

Re: Nevada Division of Environmental Protection (NDEP) Response to:
NDEP Accreditation, Laboratory ID for Perchlorate Non-Potable Water
Dated: 24 July 2017

Dear Mr. Harry Van den Berg and Ms. Carmen Caceres-Schnell:

The NDEP has reviewed the above-identified document situation (Attachment A) and finds that that the data from Test America for the period of August 2016 through June 2017 is acceptable with the following comments noted for the Administrative Record:

Test America (TA) lost their certification for non-potable water perchlorate analysis, and only for the state of Nevada for the time period identified above. The laboratory lost the certification for forgetting to run PT performance samples for the State of Nevada, which is important in that the TA lost the certification due to a human error, the lab did not lose certification due to Nevada taking the certification or due to equipment failure or malfunction. Once the error caused was discovered, TA worked quickly to regain their certification and it is important that during this same time period, TA did not lose certification for potable water perchlorate testing, (same equipment, same personal, and same laboratory). Additionally, TA did not lose any other state certification for non-potable water perchlorate over that time period. This data over this time period was not used for a decision such as "No Further Action" with NDEP. For all these reason, NDEP will accept the data.

Please contact the undersigned with any questions at jcarltonparker@ndep.nv.gov or 702-486-2850 x228.

Sincerely,

Carlton Parker, P.G.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

ec: JD Dotchin, Chief, Bureau of Industrial Site Clean-Up, Las Vegas
Weiquan Dong, Bureau of Industrial Site Clean-Up, Las Vegas
Chad Schoop, Bureau of Industrial Site Clean-Up, Las Vegas
Alan Pineda, Bureau of Industrial Site Clean-Up, Las Vegas
Grant Evenson, Bureau of Industrial Site Clean-Up, Las Vegas
Alison Fong, EPA Region 9
Allan Delorme, Ramboll Environ
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Charles Elmendorf, Stauffer
Chris Ritchie, Rambol
Curt Richards, Olin
Dave Share, Olin
Dan Pastor, P.E. TetraTech
Dave Johnson, LVVWD
Derek Amidon, Tetrtech
Ebrahim Juma , Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
Gary Carter, AMPAC
George Crouse, Syngenta Crop Protection, Inc.
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose
Joe Leedy, Clean Water Team
John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
Kelly McIntosh, GEI Consultants
Kim Kuwabara, Ramboll Environ
Kirk Stowers, Broadbent & Associates
Kurt Fehling, The Fehling Group
Kyle Gadley, Geosyntec
Kyle Hansen, Tetrtech
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
Mark Duffy, U.S. Environmental Protection Agency, Region 9
Mark Paris, Landwell
Michael Bogle, Womble Carlyle Sandridge & Rice LLC
Michael Long, Hargis + Associates
Micheline Fairbank, AG Office
Nicholas Pogoncheff, PES Environmental, Inc.
Orestes Morfin, CAP
Patti Meeks, Neptune & Company Inc
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Peggy Roefer, CRC
Ranajit Sahu, BRC.
Richard Pfarrer, TIMET

Rick Kellogg, BRC
Scott Bryan, Central Arizona Project
Steve Clough, NERT
Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner LLP
Todd Tietjen, SNWA
William Carson, Terraphase Engineering



July 24, 2017

Carmen Caceres-Schnell
AECOM, Inc.
1220 Avenida Acaso
Camarillo, CA 93012

Subject: NDEP Accreditation, Laboratory ID for Perchlorate Non-Potable Water

Dear Ms. Caceres-Schnell:

It is the policy of TestAmerica to provide its clients with defensible data of the highest quality and to comply with the certification requirements of all appropriate regulatory authorities. TestAmerica Irvine is notifying affected clients of a recent gap on our certification with the Nevada Department of Environmental Protection (NDEP) for determination of Perchlorate in non-potable water at our Irvine laboratory. This notification is a part of our standard client notification procedure for events involving State or agency certifications. This certification change does not affect the validity of any data reported by TestAmerica Irvine, and all other required certifications are in place.

- CWA perchlorate was included on our NDEP Fiscal Year 2016 scope, which expired 07/31/16, but was extended per NDEP until an updated scope could be issued, on 10/27/16.
- CWA perchlorate was not included on the 2017 scope issued by NDEP, due to the lack of state-specific Performance Testing studies (PTs) for CWA perchlorate. CWA perchlorate was added to our PT schedule for NDEP, and PTs completed successfully on 2/18/17 and 5/16/17. CWA perchlorate was added back to our NDEP scope effective 06/21/2017.
- We have maintained passing PTs for perchlorate by EPA 314.0 under the Safe Drinking Water Act (SDWA) and Resource Conservation and Recovery Act (RCRA) throughout this timeframe for both ORELAP and NDEP. We have maintained this parameter on our Oregon TNI-NELAP (ORELAP) scope throughout this timeframe. ORELAP is our primary accrediting authority and NDEP certification is based upon reciprocity with ORELAP. The analytical method (EPA 314.0), instrumentation, standards, and analysts are the same for all three programs (CWA, SDWA and RCRA).
- As an immediate corrective action we engaged with NDEP to ensure a return to scope for perchlorate in non-potable water. As a long term corrective action, we have implemented a more rigorous review procedure with regard to scope requests versus existing scope elements versus PT availability in the case of state-specific accreditation programs.

TestAmerica

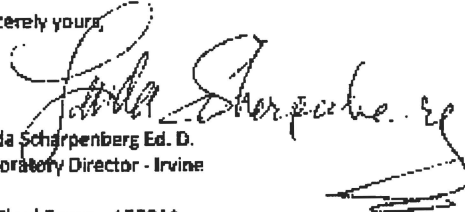
THE LEADER IN ENVIRONMENTAL TESTING

- Initial client notifications were made upon our discovery of the issue and follow up with NDEP regarding requirements for adding perchlorate back to the scope. These notifications occurred in June 2017.

Through this process, TestAmerica has complied with all requests from NDEP for supporting documentation. We appreciate NDEP's dedication and thoroughness to review the PT and comparison data, and assist us in obtaining the appropriate certification. We look forward to continuing to serve our clients, their programs, and the residents of the State of Nevada.

If you have any questions regarding this or require further information, please contact me at linda.scharpenberg@testamericainc.com, or via phone at 949.261.1022.

Sincerely yours,



Linda Scharpenberg Ed. D.
Laboratory Director - Irvine

cc: Chad Roper - AECOM
Kathryn Chang, Quality Assurance Manager - TestAmerica
Pamela Schemmer, Quality Assessment Director - TestAmerica
Patty Mata, Project Manager - TestAmerica