



environmental management, inc.

From: Deni Chambers
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Date: August 13, 2010

To: Shannon Harbour, P.E.
Nevada Division of Environmental Protection

RE: Response to August 2, 2010 Nevada Division of Environmental Protection (NDEP) Comments on *Data Validation Summary Report, Pre-Confirmation Sampling RZ-B*, Dated July 19, 2010.

1. *Comment: Data Issues, NDEP noted 38 records for asbestos where the detect_flag_fod = T and result_reported < SQL. The code final_validation_code given is "sp", which was not found in the validation_reason_code table. TRX does list "sp#" in the table but it says "detected value reported >SQL <PQL", which is incorrect in this case since the value is < SQL and no PQL is provided. For this issue, please clarify the following:*
 - a. *The basis for the SQL (i.e. how is this derived since asbestos_analytical_sensitivity value is also provided?).*
 - b. *Why the asbestos data is qualified with "sp" based on this SQL.*

Response:

- a. The SQL for asbestos has been removed from the EDD per the most recent EDD guidance document (BMI Plant Sites and Common Areas Projects, Henderson, Nevada NDEP-Required Electronic Data Deliverables (EDD) Format, July 10, 2010).
 - b. When the result is qualified by the laboratory as "J/Estimated" (when Total asbestos fibers are detected but, less than 3 as specified in the analytical method) the "sp" validation reason qualifier is applied.
2. *Comment: Format Issues, please note that the following comments should be corrected for future DVSR submittals. No revision is needed for this Deliverable.*
 - a. *Field name prep_date has a space introduced in the name "prep _date".*
 - b. *Field name prep_time has a space introduced in the name "prep _time".*
 - c. *The validation code "sp" is found in the results table but not in the validation_reason table. The validation_reason table has the # sign after the "sp." Confirm these are equivalent.*

Response:

- a. The format for the field name "prep-date" was amended by removing the space.
- b. The format for the field name "prep_time" was amended by removing the space.
- c. The validation reason code "sp#" found in the results table was amended to "sp" to match the validation_reason table.