NERT Response to NDEP October 10, 2011 Comments Regarding:

NERT's Data Validation Summary Report (Appendix C of the Annual Remedial Performance Report for Chromium and Perchlorate, Henderson, Nevada, July 2010 – June 2011) Dated August 26, 2011.

DVSR Comments

1. NDEP Comment:

The validation of the total chromium results, using methods 6010 and 200.7, resulted in the censoring of 8 samples due to blank contamination. The censoring of data due to blank issues is inconsistent with the July 18, 2011 Guidance on Qualifying Data Due to Blank Contamination. This may be due to an overlap between when the data was validated and when the Guidance was issued. Please revise the DVSR using the referenced Guidance.

NERT Response:

The eight total chromium samples that had been censored due to blank contamination have been revalidated. These results are now consistent with the July 18, 2011 Guidance on Qualifying Data Due to Blank Contamination. The DVSR and EDD have been revised to reflect the revalidated results. Laboratory Data Consultants (LDC) will validate future DVSRs consistent with the July 18, 2011 Guidance.

EDD Comments

2. NDEP Comment:

Please move the filter_flag to the Results table. This is necessary for this and future EDDs since samples were analyzed both filtered and unfiltered. It is noted that the sample IDs have been adjusted in this report to identify those filtered and unfiltered (e.g. 2VD2911_02/09/11-F versus 2VD2911_02/09/11-t).

NERT Response:

The field filter_flag has been moved to the Results table. Sample IDs no longer have the filter_flag appended to the end.

3. NDEP Comment:

There appears to be a typographical error. Location_id CDL1-R in the Samples table is listed as CLD-1R in the Locations table. Please revise.

NERT Response:

CLD-1R is the correct location ID. The Samples table has been corrected.

4. NDEP Comment:

Please provide the dvsr-id for the following two identified records in the Samples table where dvsr-id is null: M-48A and PC-21A.

NERT Response:

The two sample IDs without dvsr-id were incorrect and have been deleted.

5. NDEP Comment:

There are 1126 records in Samples table where Litho field is NULL but Matrix field is WG. (Please see Tab "#1 Litho NULL for SO, WG" in the attached spreadsheet–electronic attachment.) Please revise as necessary.

NERT Response:

The litho field has been populated for all groundwater samples.

6. NDEP Comment:

There are 459 records in Results table where Prep_date and prep_time is NULL. (Please see Tab "#2 prep_date NULL" of the attached spreadsheet.) It is understood that some of these analyses have no preparation (e.g. pH). However, if a preparation step is required, the laboratory should provide that information in the report and this should be incorporated into the EDD. Please revise as necessary.

NERT Response:

The lab identified the following issues regarding results reported without prep_date and prep_time:

- Sodium results should have had the prep info reported. These samples are reported correctly now.
- Total Organic Halides are prepped and analyzed the same day. The EDD has been corrected to report prep_date correctly. Prep_time information is not available for these results; however the lab is fixing their system to correctly report prep_date and prep_time for future deliverables.
- Perchlorate is not prepped and any reported prep_date and prep_time was incorrect. These results have been corrected to show no prep info.

The lab confirmed that any other results that had been reported without prep_date had not been prepped, and were reported correctly.

7. NDEP Comment:

Field result_unit in the Results table should be result_units (add the s at the end). Please revise.

NERT Response:

The name of the field "result_units" has been corrected.

8. NDEP Comment:

Field name subarea in the Locations table should be named sub_area. Please revise.

NERT Response:

The name of the field "sub_area" has been corrected.

9. NDEP Comment:

There are 246 rows where subarea in Locations table is NULL. (Please see Tab "#3 subarea NULL" of the attached spreadsheet.) Please revise as necessary and clarify whether there are subarea designations available for these locations.

NERT Response:

The field sub_area has been filled in for all field samples except for SF-1 samples, which were surface water samples. Also, many locations had been classified under the sub_area "TRONOX". These have been updated to sub_area "NERT".

10. NDEP Comment:

There are 1124 rows where hydro in Locations table is NULL and matrix is WG. (Please see Tab "#4 hydro null for WG" of the attached spreadsheet.) Please revise as necessary.

NERT Response:

The hydro field has been populated for all groundwater samples.