



June 10, 2013

Mr. Weiquan Dong, PE  
Bureau of Corrective Actions, Special Projects Branch  
Nevada Division of Environmental Protection  
2030 E. Flamingo Rd., Suite 230  
Las Vegas, Nevada 89119

**Re: NERT Response to NDEP April 29, 2013 Comments on the Electronic Data Deliverable from the Annual Remedial Performance Report for Chromium and Perchlorate, July 2011 – June 2012, dated August 2012**

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (the Trust), ENVIRON International Corporation (ENVIRON) has prepared an annotated response to the Nevada Division of Environmental Protection's (NDEP's) comments on the Electronic Data Deliverable (EDD) included as part of the Annual Remedial Performance Report for Chromium and Perchlorate, July 2011 – June 2012. The comments were included as Attachment A in NDEP's letter to the Trust dated April 29, 2013.

Please contact John Pekala at (602) 734-7710 if you have any comments or questions concerning this response to comments.

Sincerely,

John M. Pekala, CEM #2347  
Senior Manager

Allan J. DeLorme, PE  
Managing Principal

#### Attachments

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas  
Brian Rakvica, McGinley and Associates, Las Vegas  
NDEP c/o McGinley and Associates, Reno

ec: Shannon Harbour, NDEP  
JD Dotchin, NDEP  
Greg Lovato, NDEP  
Stephen Tyahla, USEPA  
Rebecca Shircliff, Neptune and Company  
Nevada Environmental Response Trust  
Tanya O'Neill, Foley & Lardner LLP  
Jeff Gibson, AMPAC  
Mark Paris, BMI  
Lee Farris, Landwell  
Ranajit Sahu, BMI  
Joe Kelly, Montrose  
Paul Sundberg, Montrose

Curt Richards, Olin  
Jay Gear, Olin  
Ed Modiano, de maximis  
Chuck Elmendorf, Stauffer  
Nick Pogoncheff, Stauffer  
George Crouse, Syngenta  
David Hadzinsky, TIMET  
Steve Sarandis, GEI Consultants  
Kirk Stowers, TIMET  
Victoria Tyson, Tyson Contracting (for TIMET)  
Enoe Marcum, WAPA

## Attachment A

### Nevada Environmental Response Trust (“NERT” or “the Trust”) Response to Nevada Division of Environmental Protection (NDEP) April 29, 2013 Comments on the Electronic Data Deliverable from the Annual Remedial Performance Report for Chromium and Perchlorate, July 2011 – June 2012, dated August 2012

The NDEP Comments (numbered and italicized) and Response to Comments (RTCs) from ENVIRON on behalf of the Trust are presented below:

1. *Sample top depth and sample bottom depth must be populated for all "WG" matrix samples.*

**Response:** The sample\_top\_depth and sample\_bottom\_depth fields have been populated with the groundwater well's top of screen and bottom of screen values. The following wells have no available well screen information and the depth fields have been left blank for these samples: H-11, H28A, H48, HM-2, HMW-13, HMW-14, HMW-15, HMW-16, MC-3, MC-6, MC-7.

2. *The litho field in the samples table needs to be populated for six "WG" matrix samples.*

**Response:** The six records are from SF-1 samples, which are not part of the reported sampling event and have been removed from the EDD.

3. *There are 422 records where validation\_flag is NULL. This field must be populated with T (true) or F (false). T indicates the value was validated after the laboratory reported the value. The analytes that were not validated in this EDD should equal F.*

**Response:** All results now have the correct value set in the validation\_flag field.

4. *The northing and easting fields need to be populated for location\_id "SF-1."*

**Response:** SF-1 samples are not part of the reported sampling event and have been removed from the EDD.

5. *The hydro field in the samples table must be populated for six "WG" matrix samples.*

**Response:** The six records are from SF-1 samples, which are not part of the reported sampling event and have been removed from the EDD.

6. *For 49 records, result\_reported is NULL and the detect\_flag\_fod = 'U'. For non-radionuclide non-detected results, the result\_reported should equal the SQL, unless the value has been censored to a higher level because of mitigating factors (in this*

*case, the reason for raising the reported value above the SQL should be very apparent from the final validation qualifier, reason code, and validation reason).*

**Response:** The result\_reported field has been populated for these samples.

- 7. There are 23 records where analyte\_name = "Total Dissolved Solids" and the SQL is NULL. There are many other TDS results with the SQL reported. The SQL needs to be populated for these records.*

**Response:** The MDL and SQL fields have been populated for the results that had been missing these values.