



July 24, 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: Response to NDEP Comments dated June 12, 2013 on the Data Validation Summary Report Revision 1 and Electronic Data Deliverable Revision 1 for the Interim Soil Removal Action Completion Report Nevada Environmental Response Trust Site, Henderson, Nevada

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (the Trust), ENVIRON International Corporation (ENVIRON) has prepared the enclosed Revised Data Validation Summary Report (DVSR) and Revised Electronic Data Deliverable (EDD). The DVSR and EDD have been revised to address Nevada Division of Environmental Protection (NDEP) comments, which were provided to the Trust by email on June 12, 2013. The EDD has also been revised in accordance with the EDD guidance recently issued by NDEP, as requested by NDEP. Included with the electronic files are copies of two revised lab reports (G1E040615 and G1E050552). Also, attached are ENVIRON's annotated responses to NDEP's comments.

Please contact John Pekala with any questions at jpekala@environcorp.com or (602) 734-7710.

Sincerely,

John M. Pekala, PG
Senior Manager
Nevada CEM #2347

Allan J. DeLorme, PE
Principal

Attachment

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

ec: James D. 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
Ranjit 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

ec: Kirk Stowers, TIMET
Victoria Tyson, Tyson Contracting
(for TIMET)
Enoe Marcum, WAPA

Response to NDEP Comments dated June 12, 2013 on: *Data Validation Summary Report Revision 1 and Electronic Data Deliverable Revision 1 for the Interim Soil Removal Action Completion Report, Nevada Environmental Response Trust Site, Henderson, Nevada*
June 2010-November 2011
Dated January 2012

DVSR Comments

3. NDEP Comment:

General comment, Asbestos Data, the introduction of the report and the EDD indicate that samples were analyzed for asbestos but there is no discussion of these results in the report. It is understood that asbestos is a distinct analyte and qualifications for asbestos analysis are not well defined but the report should discuss any quality issues or lack thereof found in the results. Section 1.0 has asbestos listed as a wet chemistry method but indicates that EPA Method 540-R97-028, which is for asbestos in soil and bulk samples, is used for analysis. The asbestos method should not be listed under wet chemistry and should be set apart in its own category. For results in the EDD, it appears that a concentration (S/gPMIO) is listed instead of the total structure counts. Asbestos-related risk assessment is calculated based on the number of structures and the results should be reported in number of total structures counted.

NERT Response:

A new section has been added to the DVSR for discussion of asbestos data validation (Section 8.0). In the EDD, result_units for asbestos has been updated to "Total Structure Count" to reflect that the result values are structure counts and not a concentration.

Neptune & Co., Inc.:

The units have been changed but the actual result values are still in concentration, listed at values such as 8960000. The count should be 0 for both for all structures. Additionally, the DVSR report indicates that there were no detects in the method blanks. This data should have been included with field samples, but was not. These issues need to be addressed.

NERT Response:

Results and detection limits have been changed to 0 for all asbestos structures counts. Method blanks were not required for the asbestos analysis, and none were submitted. Section 8.2.2 of the DVSR has been updated to reflect this.

6. NDEP Comment:

EDD and Attachments A and H, the reported results for two samples do not match what is in the EDD. Sample DS-14-1 (toxaphene) has a reported result of 6,700 µg/kg in Attachment A but the EDD lists a result of 28,000 µg/kg. Sample SSAO5-09-0.0_0I_BPC (benzo[k]fluoranthene) has a reported result of 45 µg/kg in Attachment H but the EDD lists a results value of 370 µg/kg. In addition to these two reporting issues, it is believed that this issue may be more systematic and it is recommended that the agreement between EDD results and reported results be checked for all samples.

NERT Response:

The Sample Quantitation Limit (SQL) and Practical Quantitation Limit (PQL) fields were swapped in the data from the lab, resulting in these fields being shown incorrectly in the EDD. As a result, non-detects were adjusted to the wrong value in the EDD. The EDD has been

updated to show correct values for the SQL, PQL, and result_reported fields. Non-detects have been adjusted to the correct SQL. The non-detect results were correctly reported in Attachments A and H.

Neptune & Co., Inc.:

The proper corrections were made for sample DS-14-1(toxaphene) but no changes were made in the EDD for Sample SSAO5-09-0.0_0I_BPC (benzo[k]fluoranthene), which still shows a value of 370 and does not agree with Attachment H. This still needs to be addressed.

NERT Response:

SQL and PQL fields were reviewed for all samples which indicated that three sample delivery groups (SDGs) needed correction. After the SQLs and PQLs were corrected for these samples, non-detect results were updated to the corrected SQLs. Results now agree with Attachments A and H. With this correction, the correct value of <45 µg/kg for benzo[k]fluoranthene in Sample SSAO5-09-0.0_0I_BPC is provided in both the EDD and Attachment H.

EDD Comments

16. NDEP Comment:

Detect Status, there are 782 records where detect_flag = T and result reported < SQL. Nondetects should have detect flag fod = F and detect flag ra = F for non radionuclides and result_reported should be equal to the SQL. 47 of these records also need final validation qualifier and final validation reason codes fields populated (currently NULL).

NERT Response:

The SQL and PQL fields were swapped in the data from the lab, resulting in these fields being shown incorrectly in the report EDD. These results appeared to be detections less than the SQL, but the SQL field had the PQL value. The EDD has been updated to correctly show the SQL and PQL values. These results are not less than the corrected SQL.

Neptune & Co., Inc.:

There are 83 records that still have this issue: detect_flag = T and result reported < SQL. Nondetects should have detect flag fod = F and detect flag ra = F for non radionuclides and result_reported should be equal to the SQL. These records also need final validation qualifier and final validation reason codes fields populated to reflect the nondetect status.

NERT Response:

SQL and PQL fields were reviewed for all samples which indicated that three sample delivery groups (SDGs) needed correction. After SQLs and PQLs were corrected for these three SDGs, the above mentioned records were reviewed and are properly reported. Previously, the SQL column showed the PQL and these results looked as though they were detects reported below the SQL. With the SQL column now correctly showing the SQL these samples are reported correctly as detections greater than SQL. Because these results remain detections, the final_validation_qualifier and final_validation_reason_code fields did not require any changes. Further data checks revealed six dioxin results that were incorrectly reported by the lab as estimated detections below the SQL; however these results should have been reported as not detected at the SQL. The DVSR and EDD have been corrected. Corrected lab reports for both of the affected SDGs (G1E040615 and G1E050552) have been issued by TestAmerica, and are provided with these responses to comments.

18. NDEP Comment:

EDD, SQL Greater Than PQL in EDD, Sample DS-14-1. The SQL listed for Sample DS-14-1 is 28,000 while the PQL is listed as 16. Although the units are not labeled for the SQL and PQL, they are assumed to be µg/kg. The SQL should be lower than the PQL and this should be addressed/corrected.

NERT Response:

The SQL and PQL fields were swapped in the data from the lab, resulting in these fields being shown incorrectly in the EDD. The EDD has been updated to correctly show the SQL, PQL, and result_reported values. The SQL and PQL units are reported using the same units as the analytical results.

Neptune & Co., Inc.:

In revision 0 of the EDD, this issue was associated with sample DS-14-1b and in revision 1 it is associated with sample DS-14-1a. Please clarify.

NERT Response:

Sample DS-D14-1 was analyzed by two different Test America laboratories (Denver and Sacramento), and each reported on a unique SDG. To make these sample ids unique in the data deliverable, an 'a' or 'b' was appended to each sample id. The suffix 'a' and 'b' have no meaning other than to make each sample unique, and they were randomly assigned. In Rev0, 'a' was applied to the sample analyzed in Sacramento, and 'b' was assigned to the sample analyzed in Denver. When the EDD was regenerated for Rev1, the 'a' and 'b' suffixes were again randomly assigned; however, in this EDD, 'a' was applied to the sample analyzed in Denver and 'b' was assigned to the sample in Sacramento. For each revision of the EDD, the samples and results tables are internally consistent.

New EDD Comment**20. NDEP Comment:**

Locations table, the locations DS-DB-1a and DS-DB-1b are present in the samples table but not the locations table. These locations need to be added to the location stable.

NERT Response:

Both samples refer to location DS-DB-1. The location_id field in the samples table has been corrected for these two samples.