

September 26, 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 August 22, 2013 and supplemental comment dated August 29, 2013 on NERT's RTC for the Data Validation Summary Report, Revision 2; and NERT's RTC for the Data Validation Summary Report, Revision 1

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 in a letter dated August 22, 2013, and the supplemental comments provided to the Trust by email on August 29, 2013. 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
Kirk Stowers, TIMET
Victoria Tyson, Tyson Contracting
(for TIMET)
Enoe Marcum, WAPA

**Response to NDEP Comments dated August 22, 2013 and supplemental comment dated August 29, 2013 on: *Data Validation Summary Report Revision 2 and Electronic Data Deliverable Revision 2 for the Interim Soil Removal Action Completion Report, Nevada Environmental Response Trust Site, Henderson, Nevada June 2010-November 2011*
Dated January 2012**

DVSR Comments

1. NDEP Comment:

Asbestos data should be validated following NDEP guidance (Data Validation Guidance for Asbestos Data in Soils for the Basic Management Incorporated (BMI) Complex and Common Areas, July 2012) and the modified elutriator method (EPA Method 540-R-97-028 with Berman and Kolk Modifications, 2000). It is not clear how any of the DQO measures (e.g., calibration, accuracy, holding time) were determined for Section 8.0 of the DVSR. For example, Section 8.1.1 points the reader to a metals report for instrument calibration in Section 7.1.1. The two main QC measures listed in the modified elutriator method are duplicates and blanks. Instructions or criteria for calibration or analyte quantitation are not discussed. Blanks are required for analysis per the modified elutriator method.

NERT Response:

Asbestos samples were taken by a previous consultant, Northgate Environmental Management (Northgate). The EDD and lab report they provided did not contain raw data, instrument calibration, or filter blank data. The lab report also did not contain laboratory duplicates applicable to these samples. An EPA Level IV laboratory report for these samples, which should contain the information requested by NDEP, has been requested from the analytical laboratory EMSL, via a request from ENVIRON to Northgate; however, as of the date of this letter, the Level IV laboratory report has not yet been received. Section 8.0 of the DVSR has been revised to indicate that the EDD and laboratory report previously provided does not contain the requested information. Upon receipt of the Level IV laboratory report, the laboratory report can be reviewed and the DVSR can be updated and provided to NDEP under separate cover.

2. NDEP Comment:

Attachment E, it appears that the "Acceptance Limits" column may have formatting issues and needs to be resized to show all the ranges.

NERT Response:

Attachment E has been reformatted to properly display the "Acceptance Limits" column.

EDD Comments

3. NDEP Comment:

The Samples table contains location IDs "DS-DB-1a" and "DS-DB-1b", which are not currently in the Locations table. These two locations need to be added to the Locations table so that we have the metadata for each location. The EDD Guidance requires that all location IDs are in both the Samples table and the Locations table. We also note that "DS-DB-1a" and "DS-DB-1b" were used as both sample IDs and location IDs. In this case, it may be good to make sure

they were used correctly in the EDD. In the future to avoid confusion, it is recommended that the same name not be used for sample IDs and location IDs.

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. The samples associated with this location have been reviewed and the sample IDs and analytical results are reported correctly.