

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 MAY 19, 2015 COMMENTS ON THE  
DATA VALIDATION SUMMARY REPORT AND ELECTRONIC DATA  
DELIVERABLE FOR THE SEMI-ANNUAL REMEDIAL PERFORMANCE  
REPORT FOR CHROMIUM AND PERCHLORATE, JULY – DECEMBER  
2014, DATED APRIL 30, 2015**

Date June 17, 2015

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (Trust), Ramboll Environ US Corporation (Ramboll Environ) has prepared an annotated response to the Nevada Division of Environmental Protection (NDEP) comments on the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) included as part of the Semi-Annual Remedial Performance Report for Chromium and Perchlorate, July – December 2014. The comments were included as Attachment A in NDEP's letter to the Trust dated May 19, 2015. Our responses to NDEP comments are provided in Attachment A to this letter.

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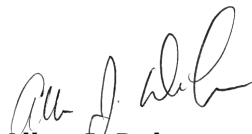
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Please contact John Pekala at (602) 734-7710 if you have any comments or questions concerning this submittal.

Yours sincerely



**John M. Pekala, PG**  
Manager



**Allan J. Delorme, PE**  
Principal

Attachments

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas

NDEP c/o Broadbent and Associates, Las Vegas

ec: James D. Dotchin, NDEP  
Greg Lovato, NDEP  
Nevada Environmental Response Trust  
Kirk Stowers, Broadbent & Associates  
Kurt Fehling, The Fehling Group  
Rebecca Shircliff, Neptune and Company  
Alison Fong, USEPA  
Katherine Baylor, USEPA  
Tanya O'Neill, Foley & Lardner LLP  
Frank Johns, Tetra Tech  
Derik Amidon, Tetra Tech  
Jeff Gibson, AMPAC  
Mark Paris, BMI  
Ranjit Sahu, BMI  
Lee Farris, Landwell  
Joe Kelly, Montrose  
Paul Sundberg, Montrose  
Curt Richards, Olin  
David Share, Olin  
Chuck Elmendorf, Stauffer  
Nick Pogoncheff, Stauffer  
George Crouse, Syngenta  
Ed Modiano, de maximis  
Richard Pfarrer, TIMET  
Enoe Marcum, WAPA

**Attachment A****Nevada Environmental Response Trust (Trust) Response to Nevada Division of Environmental Protection (NDEP) May 19, 2015 Comments on the Data Validation Summary Report and Electronic Data Deliverable for the Semi-Annual Remedial Performance Report for Chromium and Perchlorate July – December 2014, dated April 30, 2015**

The NDEP comments (numbered and italicized) and our response to comments on behalf of the Trust are presented below:

**DVSR Comments**

- 1. Section 1.0, page 3, Qualifier Hierarchy. It appears that the qualifier hierarchy has been truncated from previous DVSRs and the following statement was removed from this DVSR. "UJ = U plus J or J-" and "The UJ flag is used when a non-detected (U) flag is added to a biased (J-) or non-biased flag (J)." This hierarchy should be used with non-detects that may be affected by non-biased or potentially low biased QC issues. Previous comments may have created confusion, but please add this back into the DVSR and confirm this is the hierarchy used for data validation. Note that a UJ is not used with there is a potential positive bias (J+) since a positive bias would theoretically result in a detect.*

**Response:** The DVSR hierarchy has been revised to include qualifiers removed and the J+ qualifier clarification has been added to address the qualifications of detect only. The hierarchy shown is the one used for data validation.

- 2. Section 1.0, page 6, Sensitivity. Define MDL, SQL, and PQL per NDEP guidance (4/13/09), including details as to how they are determined.*

**Response:** Definitions consistent with NDEP guidance for MDL, SQL, and PQL have been added to Section 1.0.

- 3. Section 1.0, QC Checks. Please add a table that lists the QC checks performed for each validation stage.*

**Response:** A new Table II has been added. It shows the quality control checks that are performed for each validation stage.

- 4. Section 3.1.2, Surrogates. Note that this suggestion is in the DVSR, but is not discussed in Attachment B.*

**Response:** A discussion of surrogates has been added to Attachment B as Section V.

5. *Section 3.1.7, Not Reportable Data. Please discuss in the DVSR how the data considered "not reportable" were qualified (i.e., qualifier/code used). Also, discuss in the DVSR what criteria or guidelines were used to determine which data would be reported and which were not.*

**Response:** A discussion of data considered "not reportable" has been added to Section 3.1.7.

6. *General, Results between the SQL and PQL. The EDD includes samples that are qualified due to results between the SQL and PQL. Please describe this in the DVSR and include a table.*

**Response:** With the addition of a new Table II in response to Comment 3, Table III has been renamed to Table IV. Results between the SQL and PQL have been added to Table IV. The DVSR describes this in Sections 2.3 and 3.3.

7. *Table III. There are no results listed for EB-I for chromium and FB-1 for chromium, hexavalent in this table. Please revise as necessary.*

**Response:** With the addition of a new Table II in response to Comment 3, Table III has been renamed to Table IV. The chromium results for EB-I and FB-1 have been added to Table IV.

#### **EDD Comments**

1. *Location M-94 was the only location\_id that did not have a sub\_area provided. The EDD guidance requires a sub\_area for all locations. Please provide the sub\_area for M-94 if it is available.*

**Response:** The sub\_area of location\_id M-94 is "FORMER PARCEL I" and the field in the Locations table has been populated in the attached revised EDD.