

ENVIRONMENT & HEALTH

Mr. Weiquan Dong, PE Bureau of Industrial Site Cleanup Nevada Division of Environmental Protection 2030 E. Flamingo Rd., Suite 230 Las Vegas, Nevada 89119

RE: NERT RESPONSE TO NDEP JULY 14, 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, REVISION 1, DATED JUNE 11, 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, Revision 1, dated June 11, 2015. The comments were included as Attachment A in NDEP's letter to the Trust dated July 14, 2015. Our responses to NDEP comments are provided in Attachment A to this letter. Revised copies of Tables III and IV of the DVSR are provided with this letter. Date August 4, 2015

Ramboll Environ 2200 Powell Street Suite 700 Emeryville, CA 94608 USA

T +1 510 655 7400 F +1 510 655 9517 www.ramboll-environ.com

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

Yours sincerely,

John M. Pekala, PG Senior Manager

Allan J. Delorme, PE Principal

Attachments cc: BMI Compliance Coordinator, NDEP, 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 Ranajit 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) July 14, 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, Revision 1, dated June 11, 2015

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

DVSR Comments

1. Table IV "Reason Code Definition" does not match with the Table II definition for "sp". Please revise Table IV to include the correct "Reason Definition Code" for "sp" and also add a column that shows the SQLs for results. The revised Table IV can be submitted electronically.

Response: In Table IV, the Reason Code Definition for Reason Code "sp" has been changed to "SQL < Detect < PQL" to note that the detection is greater than the SQL and less than the PQL. Although the wording is different, this definition is consistent with the definition of "sp" as "detected value reported >SQL <PQL" previously included in Table III (formerly Table II). To avoid confusion, the definition in Table III has also been changed to "SQL < Detect < PQL". As requested, the revised Table IV includes SQLs. The revised Table III and IV are provided with this response.