

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

**NERT RESPONSE TO NDEP DECEMBER 4, 2015 COMMENTS ON THE  
DATA VALIDATION SUMMARY REPORT AND ELECTRONIC DATA  
DELIVERABLE FOR THE ANNUAL REMEDIAL PERFORMANCE REPORT  
FOR CHROMIUM AND PERCHLORATE, JULY 2014 THROUGH JUNE  
2015, DATED SEPTEMBER 9, 2015**

February 12, 2016

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 Annual Remedial Performance Report for Chromium and Perchlorate, July 2014 through June 2015. The comments were included as Attachment A in NDEP's letter to the Trust dated December 4, 2015. Our responses to NDEP comments are provided in Attachment A to this letter. The revised DVSR and EDD are included in this transmittal as electronic files.

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](http://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  
CEM #2347 (expires 9/20/2016)



**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  
Carlton Parker, 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  
Tanya O'Neill, Foley & Lardner LLP  
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) December 4, 2015 Comments on the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) for the Annual Remedial Performance Report for Chromium and Perchlorate July 2014 through June 2015, dated September 9, 2015

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

#### DVSR Comments

- 1. Attachment A and Section VI. Matrix Spike/Matrix Spike Duplicate Table is missing information for sample M-7B Matrix Spike/Matrix Spike Duplicate recovery as is listed in Table IV Overall Qualified Results indicating that the recoveries were outside the laboratory acceptance limits.*

**Response:** The Attachment A, Section VI table of the DVSR indicates that boron results for all samples in SDG 440-110915-1 are qualified due to M-5A matrix spike/matrix spike duplicate (MS/MSD) percent recoveries. In the attached revised DVSR, the Attachment A, Section VI table has been revised to specify that samples M-5A and M-7B boron results are qualified. Table IV Overall Qualified Results is unchanged. No Matrix Spike/Matrix Spike Duplicate was run for sample M-7B.

- 2. Attachment B and Section XII Overall Assessment of Data. Row six (6) of the 2015 Annual Remedial Performance Sampling section Technical Holding Time (H) should be a lower case (h).*

**Response:** In the attached revised DVSR the code (H) has been changed to lower case (h) in the sixth row of the Wet Chemistry - Data Qualification Summary table.

#### EDD Comments

- 1. In the results table, the final\_validation\_qualifier for chromium [VI] for one field blank and one equipment blank as well as the initial result for M-95-20150526 is an "R", which indicates the result is rejected. Because the result is qualified as rejected, the detect\_flag\_fod and detect\_flag\_ra should also be populated with an "R". Please correct the "D" in the detect\_flag\_fod and detect\_flag\_ra fields to an "R" to be consistent with the final\_validation qualifier.*

**Response:** In the attached revised EDD, the detect\_flag\_fod and detect\_flag\_ra fields have been populated with an "R" for the three results mentioned.

2. *In the results table, there are two results for chromium [VI] for sample M-95-20150526. One result was rejected and one result was qualified with a J- for exceeding holding times. Please use the reanalysis\_flag field in the results table to indicate which is the reanalysis, so only the final result gets uploaded into the database.*

**Response:** In the attached revised EDD the reanalysis\_flag field for the M-95-20150526 chromium [VI] results has been changed to indicate which result is the reanalysis.

3. *In the samples table, all of the groundwater samples with the exception of nine samples have a sample\_top\_depth and a sample\_bottom\_depth provided. Please provide the sample\_top\_depth and a sample\_bottom\_depth for these nine samples if available.*

**Response:** There is no available well screen information in the January 2014 All Wells Database for the nine wells: H-28A, HM-2, HMW-13, HMW-14, HMW-15, HMW-16, MC-3, MC-6, and MC-7. In the attached revised EDD, the note "No screen information available" has been added to the sample\_comment field in the samples table for the nine samples. In future EDDs, sample depths for these wells will be included if that information becomes available.

4. *In the validation\_reason table, the validation\_reason for "m,be" is null. If this is a combination of the "be" and "m" codes, then provide both of those definitions in the validation\_reason field for completeness or just remove the row since both codes are already defined.*

**Response:** The validation\_reason code for "m,be" is a combination of the "m" and "be" codes. In the attached revised EDD, the "m,be" row has been removed because the individual codes are defined in other rows.