

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

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March 27, 2017

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

RE: Remedial Performance Groundwater Sampling and Analysis Plan
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the Remedial Performance Groundwater Sampling and Analysis Plan (SAP) for Nevada Division of Environmental Protection (NDEP) review. This document builds on the 2016 Groundwater Monitoring Optimization Plan (GWMO) which was approved by NDEP on June 24, 2016 and provides additional details regarding implementation of the revised groundwater monitoring program. The SAP summarizes the groundwater monitoring program and provides specific information on monitoring wells, sampling and analysis procedures and quality assurance. The data acquired under this SAP, as well as the ongoing Remedial Investigation, will be used in the contaminant mass estimates and performance metrics programs to be discussed with NDEP and launched later this year. Any additional sampling or monitoring wells installed as a result of these programs will be integrated into a revised SAP, as appropriate.

There are some minor differences between the NDEP-approved 2016 Groundwater Monitoring Optimization Plan and the SAP. These differences are listed below:

- The GWMO did not include total chromium sampling at HM-2 during the annual event. This sampling has been added to the SAP.
- The GWMO did not include well DBMW-4. This well has been added to the SAP, and will be sampled annually for depth to water, total chromium, perchlorate, TDS, nitrate, chlorate, and VOCs.
- The GWMO Plan listed Envirogen Technologies, Inc. (ETI) as the party responsible for all data collection. The SAP divides responsibility for data collection between ETI and Tetra Tech.
- The northing, easting, and top of casing information listed in Tables 1 and 5 of the GWMO reflected old measurements in the All Wells Database. The information listed in Table 6 of the SAP has been updated based on a survey completed in late-2016.
- Procedures for purging and sampling wells where stabilized drawdown cannot be achieved have been updated. While the GWMO indicated that these wells should be purged at 100 mL/min, the SAP provides revised procedure indicating that these wells should be purged at the pump's slowest purge rate. In addition, the GWMO defined the system volume as the volume of the tubing, pump, and flow cell, while the SAP defines the system volume as the pump and tubing.

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- The SAP and Water Level Measurement Field Guidance Document, inclusive to the SAP, now include information on collecting data using transducers. This was not discussed in the GWMO Plan.
- The SAP includes a comprehensive list of field documents that need to be provided for each sampling event.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Remediation Director
CEM Certification Number: 2399, exp. 3/24/19

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