OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
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January 19, 2018

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: Response to NDEP Comments on the Phase 1 Remedial Investigation Data Validation Summary Report and Electronic Data Deliverable for the March 2015 Soil Gas Remedial Investigation Sampling Nevada Environmental Response Trust Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present this response to the NDEP's December 27, 2017 comment on the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) for Soil Vapor Data collected as part of the NERT Phase 1 Remedial Investigation (RI) completed in 2015. NERT's response to the NDEP comment is provided in Attachment A.

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

Stephen R. Clough

Remediation Director

CEM Certification Number: 2399, exp. 3/24/19

Cc (via NERT Sharefile Distribution):

Jeff Kinder, NDEP, Deputy Administrator

James Dotchin, NDEP, Chief, Bureau of Industrial Site Cleanup

Carlton Parker, NDEP, Bureau of Industrial Site Cleanup

Alan Pineda, NDEP, Bureau of Industrial Site Cleanup

Christa Smaling, NDEP, Bureau of Industrial Site Cleanup

Frederick Perdomo, Nevada Attorney General's Office

Alison Fong, U.S. Environmental Protection Agency, Region 9

Mark Duffy, U.S. Environmental Protection Agency, Region 9

Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually

Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually

Tanya C. O'Neill, Foley and Lardner, LLP

Allan DeLorme, Ramboll Environ

John Pekala, Ramboll Environ

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Ranajit Sahu, BRC

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Richard Pfarrer, TIMET Rick Kellogg, BRC Rick Stater, Tronox John Holmstrom, Tronox Mike Skromyda, Tronox

NDEP Comment	Response to Comment
DVSR Comment	
1. Table V and EDD: Fifty-two results were qualified "JC" or "JBC" by the laboratory. These cannister [sic] certification results are not discussed in the text. Please add a discussion to the text and also include text regarding the professional judgment used in the decision not to qualify these results. If in the process it is decided that some (or all of the results) should be qualified, please provide an updated EDD.	Section 2.2.2 Blanks discusses blanks, including canister blanks. The criteria for qualifying is: Results Below or Above the Practical Quantitation Limit (PQL) If a sample result for the blank contaminant was less than or greater than the PQL and less than or equal to 2 times the blank value, the sample result was qualified as detected estimated (J) at the reported concentration. If a result is not qualified by the data validator it is due to: No Action If a sample result for the blank contaminant was greater than 2 times the blank value, the result was not amended. As noted in Section 2.2.2.1 Laboratory and Canister Blanks, 16 results were qualified due to canister blank contamination, and details are presented in Attachment A. Since the information above is already in the DVSR, no edits to the DVSR are necessary to address this comment. Since no additional data qualification was made as a result of this comment, no edits to the EDD have been made.

1/1 Ramboll