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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February 28, 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: Revised Data Validation Summary Report for March 2013 Soil Gas Sampling
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the March 2013 Soil Gas Sampling Response to Comments and Revised DVSR for Nevada Division of Environmental Protection (NDEP) review. This DVSR pertains to the Health Risk Assessments for Parcels C, D, F, and G. No changes were require to the electronic data deliverable. This information is being submitted as requested in your letter dated February 5, 2018. NERT's responses to the NDEP comments are 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

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

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

Attachment 1
Response to NDEP Comments - February 5, 2018

NERT and NDEP Comment	Response to Comment
DVSR Comments	
1. NDEP Comment of 12/5/2017: Section 1.0, precision: The discussion of precision states that RPD is calculated from percent recoveries but the RPD equation uses concentration. Please revise the text to use either recovery or concentration. NERT Response of 12/20/2017: In Section 1.0, precision, the text has been revised to state that relative percent difference (RPD) is calculated from reported concentrations. NDEP Response: The paragraph following the definition of "D1" and "D2" still refers to calculating RPD from percent recovery. As a revision to the text is requested in DVSR comment 9 [of 12/5/2017 NDEP letter], we also request the completion of this edit.	The paragraph following the definition of "D1" and "D2" has been revised to refer to "reported concentrations". It now states: Precision is primarily assessed by calculating an RPD from the reported concentrations of the spiked compounds for each sample in the MS/MSD pair.
2. NDEP Comment of 12/5/2017: Section 2.1.1: continuing calibration: The text notes 13 methylene chloride results were qualified. Were the remaining %Ds acceptable? NERT Response of 12/20/2017: In Section 2.1.1, continuing calibration, the text notes 13 methylene chloride results were qualified. The remaining percent difference (%Ds) were within acceptance criteria. No changes were made to the DVSR. NDEP Response: Noted. In the future, it would add clarity to note there were no other outliers or qualifications.	To clarify that data were generally acceptable and exceptions are noted in the DVSR, the final sentence of Section 1.0, Introduction now states: The QA/QC criteria were met with the exceptions noted in the following sections for each analytical method.

NERT and NDEP Comment	Response to Comment
3. NDEP Comment of 12/5/2017: Sections 4.1 and 4.2: precision and representativeness: Approximately 30% of the field duplicate results were qualified for RPD (or difference) outliers and 75% of all data (including the field duplicate results) were qualified due to the detection of helium, the leak detection compound. Given the large percentage of data qualified for these issues, a discussion of possible impacts on data representativeness and precision is warranted. (As these data are likely biased low, the discussion could also include potential effects on the usefulness of the data in the health risk assessment.) NERT Response of 12/20/2017: Field duplicate RPDs were reassessed for consistency with current field duplicate protocol. Associated results were qualified only when the RPD exceeded the precision goal and both field duplicate results were greater than the PQL. After requalifying, fewer than 11% of all results were qualified due to RPD outliers. The data_validation columns in the EDD have been updated with these qualifiers. This requalification is consistent with NDEP's June 5, 2017 comments on the NERT Parcel C DVSR. Comment 12 states: *"A number of nondetect results and results detected below the PQL were qualified for field duplicate RPD outliers. Given the additional uncertainty in results reported below the PQL, these seem like unnecessary qualifications."* Leak check data were reviewed. Of the 13 samples, the helium concentration was greater than five percent of the concentration in the shroud in only one sample, E-SG-6-030813. The 65 results for this sample are qualified due to the detection of helium. After review of leak check data, fewer than eight percent of all results were qualified. NDEP Response: Please revise the text to include the logic behind the professional judgement (or cite the guiding document containing the criterion) used to "unqualify" 585 sample results for detection of the leak check compound.	Section 2.1.7, Analyte Quantitation and Target Identification, details qualification of results due to the presence of the leak check compound (helium) in the shroud. This section has been revised to note the guidance document criterion used to determine when results for a sample with helium detected in the shroud are qualified. Since no Nevada-specific guidance regarding the qualification of data due to the detection of leak check compounds is available, guidance developed by multiple agencies in California has been used to perform the validation of these data. This guidance is the Advisory Active Soil Gas Investigations (July 2015), prepared by the California EPA, Department of Toxic Substances Control, Los Angeles Regional Water Quality Control Board, and the San Francisco Regional Water Quality Control Board. As noted in the revised text, an ambient air leak up to 5 percent is acceptable if quantitative tracer testing is performed by shrouding. The text now states: Per the California EPA, Department of Toxic Substances Control, Los Angeles Regional Water Quality Control Board, San Francisco Regional Water Quality Control Board, Advisory Active Soil Gas Investigations (July 2015) Section 4.2.2.2, an ambient air leak up to 5 percent is acceptable if quantitative tracer testing is performed by shrouding. The details regarding the qualification of results are provided in Attachment C.