

**OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE**

**Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee**  
**35 East Wacker Drive - Suite 690**  
**Chicago, Illinois 60601**  
**Tel: (702) 357-8149, x104**

June 20, 2018

Dr. 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: Data Validation Summary Report and EDD of the 2016 Annual Remedial Performance Report Including 2016 Q1 Supplemental, 2016 Q2 Supplemental, Weir Dewatered Groundwater Characterization, and Seep Well Field Sampling Response to Comments and Revised DVSR Nevada Environmental Response Trust Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the 2016 Annual Remedial Performance Report DVSR Response to Comments and Revised DVSR for Nevada Division of Environmental Protection (NDEP) review. This information is being submitted as requested in your letter dated April 27, 2018 and addresses NDEP's comments. NERT's responses to the NDEP comments and a revised DVSR and EDD are attached for your review.

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

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

Office of the Nevada Environmental Response Trust Trustee  
June 20, 2018

Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually  
Brian Loffman, Le Petomane, Inc.  
Tanya C. O'Neill, Foley and Lardner, LLP  
Allan DeLorme, Ramboll  
John Pekala, Ramboll  
Kim Kuwabara, Ramboll  
Derek Amidon, Tetra Tech  
Dan Pastor, Tetra Tech

Cc (via NERT Stakeholder Sharefile Distribution):

Betty Kuo, Metropolitan Water District of Southern California  
Brenda Pohlmann, City of Henderson  
Carol Nagai, Metropolitan Water District of Southern California  
Dave Johnson, LV Valley Water District  
Eric Fordham, Geopentech  
Jill Teraoka, Metropolitan Water District of Southern California  
Kevin Fisher, LV Valley Water District  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Metropolitan Water District of Southern California  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Orestes Morfin, Central Arizona Water Conservation District  
Peggy Roefer, Colorado River Commission  
Steven Anderson, LV Valley Water District  
Todd Tietjen, Southern Nevada Water Authority

Cc (via NERT BMI Companies Sharefile Distribution):

Anna Springsteen, Neptune Inc.  
Kirk Stowers, Broadbent Inc.  
Kristen Lockhart, Neptune Inc.  
Kurt Fehling, The Fehling Group  
Patti Meeks, Neptune Inc.  
Paul Black, Neptune Inc.  
Paul S. Hackenberry, Hackenberry Associates  
John Edgcomb, Edgcomb Law Group  
Andrew Barnes, Geosyntec  
Brian Waggle, Hargis + Associates  
Chinny Esakkiperumal, Olin Corporation  
Chuck Elmendorf, Stauffer  
Curt Richards, Olin Corporation  
Dave Share, Olin Corporation  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximus  
Gary Carter, Endeavour LLC  
George Crouse, Syngenta  
Harry Van Den Berg, AECOM  
Jeff Gibson, Endeavour LLC  
Joanne Otani, Joanne M. Otani LLC  
Joe Kelly, Montrose Chemical  
Joe Leedy, Clean Water Team  
Kelly McIntosh, GEI Consultants  
Kevin Lombardozzi, Valhi  
Kyle Gadley, Geosyntec  
Lee C. Farris, Landwell  
Mark Paris, Landwell  
Michael Bogle, Womble Carlyle Sandridge & Rice, LLP

Office of the Nevada Environmental Response Trust Trustee  
June 20, 2018

Michael Long, Hargis + Associates  
Nick Pogoncheff, PES Environmental, Inc.  
Ranajit Sahu, BRC  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
Jack Luna, Tronox  
John Holmstrom, Tronox  
Mike Skromyda, Tronox

**DVSR and EDD January to June 2016 Annual Remedial Performance  
Report Sampling RTC and Revised DVSR**

**Nevada Environmental Response Trust Site  
(Former Tronox LLC Site)  
Henderson, Nevada**

**Nevada Environmental Response Trust (NERT) Representative Certification**

I certify that this document and all attachments submitted to the Division were prepared at the request of, or under the direction or supervision of NERT. Based on my own involvement and/or my inquiry of the person or persons who manage the system(s) or those directly responsible for gathering the information or preparing the document, or the immediate supervisor of such person(s), the information submitted and provided herein is, to the best of my knowledge and belief, true, accurate, and complete in all material respects.

Office of the Nevada Environmental Response Trust

Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

**Signature:** Jay A Steinberg, not individually, but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee

*not individually but solely as Pres. of*

**Name:** Jay A. Steinberg, not individually, but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee

**Title:** Solely as President and not individually

**Company:** Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

**Date:** June 20, 2018

DVSR and EDD January to June 2016 Annual Remedial  
Performance Report Sampling RTC and Revised DVSR  
Nevada Environmental Response Trust Site  
Henderson, Nevada

**DVSR and EDD January to June 2016 Annual Remedial  
Performance Report Sampling RTC and Revised DVSR**

**Nevada Environmental Response Trust Site  
(Former Tronox LLC Site)  
Henderson, Nevada**

**Responsible Certified Environmental Manager (CEM) for this Project**

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.



June 20, 2018

**John M. Pekala, PG  
Senior Manager**

Date

Certified Environmental Manager  
Ramboll  
CEM Certificate Number: 2347  
CEM Expiration Date: September 20, 2018

The following individuals provided input to this document:

Kristin Drucquer  
Jon Hunt, PhD  
Craig J. Knox



NDEP Comment	Response to Comment
<b>DVSR Review:</b>	
<p>1. <u>Section 1.0, Introduction:</u> The text notes there are 862 environmental and quality control samples for the combined reports; however, the <i>Samples</i> table has 928 samples and Table 1 has 1205 (less the laboratory MS, MSD and DUP samples). Please confirm the number of samples and correct the DVSR or EDD/Table 1 as/if necessary.</p>	<p>The text has been updated to state that 857 environmental and quality control samples are included in the combined reports. The EDD and Table 1 have been verified and list 857 unique sample IDs.</p>
<p>2. <u>Section 1.0, Introduction, method list:</u> DOC is not among the analytes listed in the <i>parameter</i> field of the EDD. TOC is the reported parameter for SM5310C, the analysis listed for DOC. Please confirm the analyte(s) and method(s) for DOC and TOC.</p>	<p>The EDD has been revised to confirm the analytes and methods for DOC and TOC. DOC was analyzed using method SM5310B; the EDD now has "DOC" for analytical_suite and parameter_id, and "Dissolved Organic Carbon" for the parameter. TOC was analyzed using method SM5310C; no changes were made for these results; analytical_suite and parameter_id both have the value "TOC", and the parameter is "Total Organic Carbon".</p>
<p>3. <u>Table II:</u> This table indicates surrogates are assessed for metals. As neither 200.7 or 200.8 utilize surrogates, please revise this text.</p>	<p>Table II has been revised to remove the indication that surrogates are assessed for metals.</p>
<p>4. <u>Table III:</u> Stage 4 validation criterion of 10% was not met for five 2016 Q1 Supplemental analyses (dissolved metals, anions, total phosphorous, alkalinity, DOC) and one analysis for SWF (dissolved metals). This is noted in Table III, but please include this information, and the reason the criterion was not met, in the paragraph discussing validation levels.</p>	<p>For the 2016 Q1 Supplemental dataset, sample PC-137D-20160211 was validated to Stage 4 for dissolved metals, anions, total phosphorous, alkalinity, DOC. Therefore, Stage 4 validation criterion is met with 50% of samples validated to Stage 4 for these analyses. Table III has been revised accordingly.</p> <p>For the SWF dataset, three samples were analyzed for dissolved boron and dissolved chromium only. These samples were validated to Stage 2B and were included on a separate row in Table III than the other samples analyzed for dissolved metals. Table III has been revised to combine the rows for "Dissolved Metals (Boron and Chromium)" and "Dissolved Metals (Methods 200.7/200.8/7470A)". Five of the 41 dissolved metals samples were validated to Stage 4, resulting in 12% Stage 4 validation. Boron and chromium were included in the list of metals validated to Stage 4 for these samples; therefore, the Stage 4 validation criteria of 10% has been met for all individual metals.</p>

<b>NDEP Comment</b>	<b>Response to Comment</b>
<p>5. <u>Section 1.0, Introduction, next to last paragraph on page 7:</u> In addition to defining the reason codes, the text indicates Table IV also identifies possible limitations to data use. The Table title does not indicate this and table appears only to provide a definition of the reason code. Please clarify the sentence or expand Table IV to include potential data use limitations.</p>	<p>The DVSR text has been revised to clarify the use of reason codes and now states:</p> <p style="padding-left: 40px;">Reason codes explain why flags have been applied and allow data users to assess if a result is usable with qualification due to QA/QC outliers or not usable when rejected due to QA/QC outliers.</p> <p>Table IV is a list of the reason code definitions; the table has not been updated.</p>
<p>6. <u>Section 2.0:</u> The text indicates there were 4,709 results for VOCs by 8260B, but the EDD has 4,908 results, or 4,659 results without the surrogates. Please check the counts and correct as necessary.</p>	<p>The text has been revised to indicate there were 4,659 results for VOCs by method 8260B. Consistent with recent submittals, in the EDD, surrogate and spike results in the "results" table have been moved to the "results_LabQCSamples" table.</p>
<p>7. <u>Section 2.1.1, Instrument Calibration:</u> The text states 4 results were qualified for dichlorodifluoromethane and chloromethane. The EDD has 15 qualified results for these two analytes and a total of 179 results qualified "UJ" with reason code "c." Please check the counts and qualifications and correct the text/EDD as necessary. Update Table V as necessary, as a quick check indicates it has 9 results qualified for calibration outliers.</p>	<p>The DVSR text correctly states that four results for dichlorodifluoromethane and chloromethane were qualified "UJ" with reason code "c". In the revised EDD, 175 of the original 179 "UJ" qualified results by 8260B have been revised to a "U" qualifier with the reason code "nd". The remaining four results are the results noted in Section 2.1.1 of the DVSR text.</p> <p>Table V correctly shows nine VOC results qualified with reason code "c". In addition to the four dichlorodifluoromethane and chloromethane results, Table V has five qualified 1,2,3-Trichloropropane results analyzed by 8260B-SIM, as noted in the DVSR in Section 3.1.1.</p>

<b>NDEP Comment</b>	<b>Response to Comment</b>
<p>8. <u>Section 2.1.6 and 3.1.6, Field duplicate samples:</u> Rather than relying strictly on the RPD, regardless of the analyte concentration, we suggest using criteria similar to the inorganic criteria for evaluating field duplicate pairs. If 5x the PQL seems too large for the <math>\pm</math>PQL criterion, the <math>\pm</math>PQL criterion could be applied only when one or both results are less than the PQL. If changed, results in Section 2.1.6 and 3.1.6 would not require qualification and in Section 4.1.6, aluminum in pair BP-08A, chromium and lead in pair PC-91, iron and zinc in pair PC-120 would not require qualification. If changes are made, please update the text and Table V as necessary.</p>	<p>Field duplicate RPDs were reassessed for consistency with current field duplicate protocol. Field duplicate RPDs are calculated only when both results are detected above the PQL. The data validation columns in the EDD and Table V have been updated to remove the field duplicate qualifiers for 1,2-dichloroethane in pair PC-160, aluminum in pair BP-08A, chromium and lead in pair PC-91, iron and zinc in pair PC-120 with these qualifiers.</p> <p>This requalification is consistent with NDEP's June 5, 2017 comments on the NERT Parcel C DVSR. NDEP's Comment 12 regarding the Parcel C DVSR states:</p> <p style="padding-left: 40px;">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.</p> <p>Ramboll believes that NDEP's June 5, 2017 comment on Parcel C DVSR is the appropriate resolution of this matter. Since two conflicting comments have been received from NDEP on this matter, Ramboll has exercised its professional judgement and implemented a resolution consistent with NDEP's June 5, 2017 comment. Therefore, the requested change in NDEP's April 27, 2018 comment letter has not been made.</p>
<p>9. <u>Section 2.2.2, Blanks:</u> The NFG promulgates the 2x rule only for methylene chloride, acetone and 2-butanone (common laboratory contaminants). The professional judgment invoked to utilize the 2x rule for other analytes should be discussed in the text. If the 2x rule was only applied to the common laboratory contaminants, then please clarify this in the text.</p>	<p>The text was revised to indicate that professional judgement was used to utilize the 2X rule for all VOCs. The text now states:</p> <p style="padding-left: 40px;"><u>Results Below the PQL</u> Using professional judgment, if a sample result for the blank contaminant was less than the PQL and the sample result was less than or equal to 2 times the blank value, the sample result was qualified as detected estimated (J) at the reported concentration.</p> <p style="padding-left: 40px;"><u>Results Above the PQL</u> Using professional judgment, if a sample result for the blank contaminant was greater than the PQL and the sample result was less than or equal to 2 times the blank contaminant value, the sample result was</p>



NDEP Comment	Response to Comment
	<p>qualified as detected estimated (J+) at the reported concentration.</p> <p><u>No Action</u> Using professional judgment, if a sample result for the blank contaminant was greater than 2 times the blank value, the result was not amended.</p>
<p>10. <u>Section 3.1.1, Instrument Calibration:</u> The text notes five 1,2,3-trichloropropane results were qualified "J+" for an ICV %D outlier; however, the EDD has 5 results qualified "J" and 32 results qualified "UJ." Please check the counts and qualifications and correct the text/EDD as necessary. A quick check of Table V revealed 4 results qualified "J+." This table may also need to be updated.</p>	<p>The DVSR text and Table V were correct in noting five 1,2,3-trichloropropane results were qualified "J+" for an ICV %D outlier. The EDD has been revised.</p>
<p>11. <u>Section 4.1.1 Instrument calibration:</u> The text notes that some results were qualified "J+" for CRI recovery outliers; however, no results were qualified "J+" in the EDD or Table V. Please either correct the qualifications or the text and update Table V as necessary, as no bias was added to the qualifications in this table.</p>	<p>Two of the three results qualified "J+" were also qualified due to blank contamination. Due to hierarchy rules, bias was removed. The text has been revised to indicate this and now states:</p> <p style="padding-left: 40px;">Positive bias was removed for two aluminum results since these results were also qualified as estimated (J) due to method blank contamination.</p> <p>The EDD and Table V were updated to change the "J" qualifier to "J+" for zinc for sample PC-120-20160212-FD.</p>
<p>12. <u>Section 4.1.2 MS/MSD samples:</u> The text notes that four potassium results were qualified "J-" for MS/MSD recovery outliers; however, in the EDD, the potassium results were qualified "J" with no bias. Please either correct the qualification or the text. (Bias was present in the qualifications in Table V.)</p>	<p>The EDD has been revised to show the "J-" qualifier for the four qualified potassium results.</p>
<p>13. <u>Section 4.2.1, Holding times:</u> The mercury holding time is not noted in this section. Please confirm the mercury analyses were performed within the 28-day holding time and add the mercury holding time to the text in this section.</p>	<p>The text has been revised to note mercury holding time. All mercury analyses were performed within the holding time.</p>
<p>14. <u>Section 4.2.2, Blanks:</u> The description of how samples are qualified for blanks detects does not address cases where the samples result is less than the PQL and the blank is above the PQL. Please add a sentence describing this situation.</p>	<p>Section 4.2.2, Blanks has been revised to note the qualification for sample results that are lower than the PQL when the blank result is above the PQL. The text now states:</p>

NDEP Comment	Response to Comment
	<p><u>Results Below the PQL</u> If a sample result was less than the PQL and the blank contaminant value was either less than or greater than the PQL, the sample result was amended as estimated (J) at the concentration reported in the sample results.</p>
<p>15. 5.0, Wet chemistry sample counts and methods: The following sample counts noted in the text do not match the EDD (result_type field filtered to "TG"). Please check the samples counts and methods, and correct the text or EDD as required. Due to its size, Table 1 was not cross-checked.</p> <p>a. Hexavalent chromium - DVSR = 352; EDD = 354</p> <p>b. Anions - DVSR = 98; EDD = 121</p> <p>c. Perchlorate - DVSR = 841; EDD = 842</p> <p>d. Dissolved organic carbon - DVSR = 40, EDD = 0</p> <p>e. Nitrate/nitrite by calculation - The DVSR lists two samples for nitrate/nitrite as determined by calculation; however, these samples are listed in the EDD as Method 300.0 instead of Calculation. Similarly, the method for total inorganic nitrogen (TIN) is listed in the EDD as NTOTAL, instead of Calculation, as noted in the DVSR.</p>	<p>a. The text of the DVSR has been revised to note there are 354 hexavalent chromium results.</p> <p>b. The text and the EDD summarized subcontracted samples differently, resulting in different numbers for the total number of samples. The EDD has been updated to be consistent with the DVSR text and Table I. The revised DVSR, Table I, and EDD all have 98 samples analyzed for anions.</p> <p>c. The DVSR has been revised to note that 840 samples were analyzed for perchlorate. In the EDD sample M-10-20160217 has two perchlorate results, one of which is qualified as "DNR" (do not report). Also in the EDD, a lab confirmation result for PC-119-20160502 has been removed. The DVSR, EDD, and Table I all correctly show 840 samples were analyzed for perchlorate.</p> <p>d. As noted in response to Comment 2, the EDD has been revised to note the DOC results. There are 40, which is consistent with the DVSR.</p> <p>e. In the EDD, the method for the two nitrate/nitrite results and for the two total inorganic nitrogen results has been changed to "Calculation".</p>
<p>16. <u>Section 5.1.1, Instrument calibration:</u> Nitrate and orthophosphate results for samples PC-121 and PC-133 were qualified in the EDD for calibration outliers but were not noted in the text or identified in Table V. Please check the qualifications and update the text, EDD and/or Table V as necessary.</p>	<p>Four nitrate and orthophosphate results for PC-121 and PC-133 were lab confirmation results and were qualified DNR with reason code "o" for other. They were not qualified due to calibration outliers. These lab reanalyses have been removed from the EDD. No changes were made to the DVSR.</p>

NDEP Comment	Response to Comment																				
<p>17. <u>Section 5.1.3, MS/MSD samples</u>: The text indicates nitrate as nitrogen and nitrate were both qualified for MS/MSD outliers; however, only nitrate was qualified in the EDD. Please correct the text or EDD as necessary. Also, please determine if any of the qualified results were used to calculate TIN or nitrate/nitrite. If so, these results should also be qualified. Please update Table V as necessary.</p>	<p>As later noted in the response to Comment 21, the parameter and parameter_id fields for nitrate and nitrite have been revised in the EDD to show the basis for reporting. The EDD now shows the nitrate as N and the nitrate as NO3 results that were qualified for MS/MSD outliers. No changes were made to Table V. The text has been updated to state:</p> <p style="padding-left: 40px;">Positive bias was removed for one nitrate as nitrogen result since it was also qualified as estimated (J-) due to holding time exceedance.</p> <p>No qualified results were used to calculate TIN or nitrate/nitrite values.</p>																				
<p>18. <u>5.1.7, Sample result verification</u>: The following sample counts noted in the text as validated at Stage 4 do not match the EDD (result_type field filtered to "TG"). Please check the samples counts and methods, and correct the text or EDD as required. If necessary, please also update Table III.</p> <ul style="list-style-type: none"> <li>a. Hexavalent chromium - DVSR = 44; EDD = 17</li> <li>b. Anions - DVSR = 16; EDD = 15</li> <li>c. Perchlorate - DVSR = 94; EDD = 93</li> <li>d. Specific conductance - DVSR = 1; EDD = 0</li> <li>e. Phenol - DVSR = 1; EDD = 0</li> <li>f. TDS - DVSR = 98; EDD = 89</li> <li>g. Field pH - DVSR = 78; EDD = 77</li> <li>h. TOC - DVSR = 1; EDD = 5</li> <li>i. Dissolved organic carbon - DVSR = 5, EDD = 0</li> </ul>	<p>The following Stage 4 sample counts have been reviewed; the text, EDD, and Table III have been revised as necessary. The final counts below are consistent in the DVSR, EDD, and Table III.</p> <table border="1" data-bbox="1119 768 1740 1130"> <thead> <tr> <th data-bbox="1119 768 1533 857">Analytes</th> <th data-bbox="1533 768 1740 857">Samples Validated to Stage 4</th> </tr> </thead> <tbody> <tr> <td data-bbox="1119 857 1533 886">a. Hexavalent chromium</td> <td data-bbox="1533 857 1740 886">42</td> </tr> <tr> <td data-bbox="1119 886 1533 915">b. Anions</td> <td data-bbox="1533 886 1740 915">17</td> </tr> <tr> <td data-bbox="1119 915 1533 945">c. Perchlorate</td> <td data-bbox="1533 915 1740 945">94</td> </tr> <tr> <td data-bbox="1119 945 1533 974">d. Specific conductance</td> <td data-bbox="1533 945 1740 974">1</td> </tr> <tr> <td data-bbox="1119 974 1533 1003">e. Total Recoverable Phenolics</td> <td data-bbox="1533 974 1740 1003">1</td> </tr> <tr> <td data-bbox="1119 1003 1533 1032">f. TDS</td> <td data-bbox="1533 1003 1740 1032">90</td> </tr> <tr> <td data-bbox="1119 1032 1533 1062">g. Field pH</td> <td data-bbox="1533 1032 1740 1062">78</td> </tr> <tr> <td data-bbox="1119 1062 1533 1091">h. TOC</td> <td data-bbox="1533 1062 1740 1091">1</td> </tr> <tr> <td data-bbox="1119 1091 1533 1120">i. DOC</td> <td data-bbox="1533 1091 1740 1120">6</td> </tr> </tbody> </table>	Analytes	Samples Validated to Stage 4	a. Hexavalent chromium	42	b. Anions	17	c. Perchlorate	94	d. Specific conductance	1	e. Total Recoverable Phenolics	1	f. TDS	90	g. Field pH	78	h. TOC	1	i. DOC	6
Analytes	Samples Validated to Stage 4																				
a. Hexavalent chromium	42																				
b. Anions	17																				
c. Perchlorate	94																				
d. Specific conductance	1																				
e. Total Recoverable Phenolics	1																				
f. TDS	90																				
g. Field pH	78																				
h. TOC	1																				
i. DOC	6																				

<b>NDEP Comment</b>	<b>Response to Comment</b>
<p>19. <u>Section 5.2.1, Holding times:</u> The text indicates 58 samples were qualified for holding times; however, only 28 are qualified as such in the EDD. Please check the sample counts and correct the text, Table V and/or EDD as necessary. Also, please check Table V, as a quick count indicated 55 results were qualified there. The text notes nitrate and nitrate as nitrogen were both qualified, but only nitrate was qualified in the EDD (this may be related to comment #21). And, as noted in #17 above, please determine if any of the qualified results were used to calculate TIN or nitrate/nitrite. If so, these results should also be qualified (and Table V updated).</p>	<p>A total of 57 results were qualified due to holding times. The text now states:</p> <p style="padding-left: 40px;">Due to holding time criteria exceedance, three pH results by Method 9040C were qualified as detected estimated (J). Bias cannot be determined. Additionally, 54 alkalinity, hexavalent chromium, nitrate as nitrogen, nitrate as NO<sub>3</sub>, TDS results were qualified as detected estimated (J-) or non-detected estimated (UJ).</p> <p>The EDD and Table V have been revised and also have 57 results qualified due to holding times.</p> <p>As later noted in the response to comment #21, parameter names for nitrate have been updated in the EDD. The text has been updated to "nitrate as nitrogen" and "nitrate as NO<sub>3</sub>".</p> <p>As previously noted in the response to comment #17 above, no qualified results were used to calculate TIN or nitrate/nitrite values.</p>
<p>20. <u>Section 6.0, Variances in analytical performance:</u> Please add a description of the method variances mentioned in this section to the text, particularly in reference to how they may affect comparability.</p>	<p>In Section 6.0, Variances, a description of method variances has been added to the text. It now states the following exceptions:</p> <p style="padding-left: 40px;">Initial calibration verification/continuing calibration verifications (ICV/CCV) were not performed at the required frequency for hexavalent chromium in several SDGs and a closing CCV was not performed for nitrate as NO<sub>3</sub> for sample BP-05-20160218. Using professional judgment, data were not qualified in the associated samples. Since bracketing CCVs, and MS/MSD and LCS percent recoveries were within criteria, the absence of ICV/CCV was judged to have no impact on the data quality.</p> <p style="padding-left: 40px;">Initial calibration blank/continuing calibration blanks (ICB/CCB) were not performed at the required frequency. Using professional judgment, data were not qualified in the associated samples. Since the associated method blank was analyzed prior to the samples and no contaminants were found, the absence of ICB/CCB was judged to have no impact on the data quality.</p>

<b>NDEP Comment</b>	<b>Response to Comment</b>								
<p>21. <u>Nitrate in EDD</u>: For clarification, please update the <i>parameter</i> field of the analyte reported as "nitrate" to include the basis for how it was reported (e.g. as N or as NO3).</p>	<p>For clarification in the EDD, to show the basis for reporting nitrate and nitrite results, the parameter and parameter_id fields have been revised to the following.</p> <table border="1" data-bbox="1226 418 1734 542"> <thead> <tr> <th>parameter</th> <th>parameter_id</th> </tr> </thead> <tbody> <tr> <td>Nitrate as N</td> <td>14797-55-8</td> </tr> <tr> <td>Nitrate as NO3</td> <td>NO3-N</td> </tr> <tr> <td>Nitrite as N</td> <td>14797-65-0</td> </tr> </tbody> </table>	parameter	parameter_id	Nitrate as N	14797-55-8	Nitrate as NO3	NO3-N	Nitrite as N	14797-65-0
parameter	parameter_id								
Nitrate as N	14797-55-8								
Nitrate as NO3	NO3-N								
Nitrite as N	14797-65-0								
<p>22. <u>Nondetects and detects less than the PQL</u>: In the EDD there are 20 results qualified as "U" by the laboratory but not qualified U with an "nd" reason code. There are also 22 results qualified as detected below the PQL by the laboratory but not qualified "J" with an "sp" reason code. Please check these qualifications and correct as necessary.</p>	<p>The EDD has been revised. A U qualifier with an "nd" reason code has been applied to the 20 results that were qualified U by the laboratory. A J qualifier with an "sp" reason code has been applied to the 22 results qualified as detected below the PQL by the laboratory.</p>								
<p><b>EDD Review</b></p>									
<p>1. There are three records in the results table for dichloromethane (field_sample_ids are M-145-20160210, M-148A-20160210, and M-189-20160210) where the detect flags and the final_validation_qualifier are not consistent. These records have a final_validation_qualifier of "U" with a final_validation_reason_code of "bf", which indicates qualification due to field blank contamination. The detect_flag_fod and detect_flag_ra should be assigned based on the final_validation_qualifier. In this case, if the results are not detected, as indicated by the "U" final_validation_qualifier, then both detect flag fields should also be "U".</p>	<p>The dichloromethane results for M-145-20160210, M-148A-20160210, and M-189-20160210 are all detected values. In the EDD, the final validation qualifier has been revised to "J" for all three results.</p>								