

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 4, 2019

Dr. Weiquan Dong, P.E.
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, Soil Background Concentration Study
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the Revised Data Validation Summary Report associated with the Soil Background Concentration Study for Nevada Division of Environmental Protection (NDEP) review. This information is being submitted as requested in your letter dated December 19, 2018 and includes the requested annotated responses to comments.

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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NDEP Comment	Response to Comment
DVSR Comments	
<p>1. <u>Section 1, analysis list</u>: Radium-226 (Method 903.0) and radium-228 (Method 904.0) are missing from the list of methods/analytes. Please update the list to include these.</p>	<p>In the Section 1.0 analysis list, radium-226 (Method 903.0) is listed as "Radium-226 by EPA Method 903.0", and radium-228 (Method 904.0) is listed as "Radium-228 by EPA Method 904.0". No revisions to the text have been made.</p>
<p>2. <u>Section 1, references</u>: Please note that the July 13, 2018 Data Validation Guidance letter encompasses all previous data validation guidance, including blank qualification. Older NDEP data validation guidance need not be cited.</p>	<p>The reference to the January 5, 2012 NDEP data validation guidance has been removed from Section 1.0.</p>
<p>3. <u>Sections 2.1.8, 3.1.5, Stage 4 validation</u>: The text in these sections indicates that all results for samples validated at Stage 4 were detects above the SQL; however, many of the results for Stage 4 samples were non-detects. Please verify that all sample results - detects and non-detects - were verified to be correctly calculated and consider rewording these sentences to correctly convey what was done in the validation process.</p>	<p>The text in Sections 2.1.8 and 3.1.5 have been revised to note that all reported results, both detects and non-detects, were correctly calculated and reviewed as part of the Level IV evaluation.</p> <p>Section 2.1.8 now states "All reported sample results, detects and non-detects, were correctly calculated for these Stage 4 samples."</p> <p>Section 3.1.5 now states "All reported sample results, detects and non-detects, were correctly calculated for these Stage 4 samples."</p>
<p>4. <u>Sections 4.1.6, 4.2.2, 5.1.5 and Attachment C</u>: The references cite MARLAP for the evaluation of QA/QC criteria, but based on the text in Sections 4.1.6, 4.2.2, 5.1.5 and Attachment C, field duplicate results are assessed using static RPDs and method blank results are assessed as metals/wet chemistry analytes as opposed to the evaluation methods suggested in Appendix C of MARLAP. Please explain which MARLAP criteria are used, which are not, and the reason for these choices.</p>	<p>MARLAP Chapter 8 was used as a general guidance document for evaluating quality control samples associated with radiochemical data analyses. However, consistent with the validation methods used for prior radiological data collected from the NERT Site and commonly used in the environmental field for radiological data, the criteria used for calculating RPDs and assessing method blank contamination for radiological data are the same criteria established for inorganic methods. This is consistent with the objectives for precision and representativeness established in the NERT Site QAPP and allows for comparison between methods, across data sets, and with historical data.</p>
<p>5. <u>Sections 4.3 and 5.3, MDC</u>: Sections 4.3 and 5.3, MDC: While the validation guidance used to (incorrectly) refer to the minimum detectable concentration as the minimum detectable activity, this terminology has been updated. Please replace "minimum detectable activity (MDA)" with "minimum detectable concentration (MDC)."</p>	<p>"Minimum detectable activity (MDA)" has been replaced with "minimum detectable concentration (MDC)" in Sections 4.3 and 5.3, and in the List of Acronyms and Abbreviations.</p>

NDEP Comment	Response to Comment
<p>6. <u>Sections 4.2.2, 4.5, 5.1.5 and 5.5</u>: As there is no PQL for radionuclides, the final paragraph of Sections 4.2.2/5.1.5 and the final sentence of Sections 4.5/5.5 are not applicable and should be removed or revised.</p>	<p>The laboratory reported a Requested Limit of 1.0 picocurie per gram (pCi/g) for radionuclide analyses as specified in the QAPP. This Requested Limit was reviewed as part of the data validation to ensure that the QAPP requirements were met. Section 4.2.2 has been revised to note the criteria used to evaluate method blanks. The text in Sections 4.5, 5.1.5, and 5.5 have been revised to replace "PQL" with "Requested Limit".</p>
EDD Comments	
<p>1. There are no comments for the EDD "NERT 2018-1811 EDD Rev 0.mdb"</p>	<p>The above DVSR revisions do not affect the EDD; no revisions to the EDD have been made.</p>