

**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) 960-4309**

April 17, 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 and Electronic Data Deliverable  
Addendum to the In-Situ Chromium Treatability Study Results Report  
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 and Electronic Data Deliverable, In-Situ Chromium Treatability Study for Nevada Division of Environmental Protection (NDEP) review. This information is being submitted as requested in your letter dated February 21, 2019. As requested, NERT's annotated responses to the NDEP comments is provided with this letter as well as the revised DVSR and EDD.

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](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. 3/24/21

Cc (via NERT Sharefile Distribution):

Jeff Kinder, NDEP, Deputy Administrator  
Frederick Perdomo, 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  
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  
Brian Loffman, Le Petomane, Inc.  
Tanya C. O'Neill, Foley and Lardner, LLP

Office of the Nevada Environmental Response Trust Trustee  
April 17, 2019

Allan DeLorme, Ramboll  
John Pekala, Ramboll  
Kim Kuwabara, Ramboll  
Dan Pastor, Tetra Tech  
David Bohmann, 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  
David Parker, Central Arizona Project  
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 Project  
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  
Michael Long, Hargis + Associates  
Nick Pogoncheff, PES Environmental, Inc.

Office of the Nevada Environmental Response Trust Trustee  
April 17, 2019

Ranajit Sahu, BRC  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
Jack Luna, EMD  
John Holmstrom, EMD  
Mike Skromyda, EMD

NDEP Comment	Response to Comment
<i>DVSR Review</i>	
<p>1. Section 3.2.2, MS/MSD qualifications: The result for chloroform in sample CTMW-06D- 20180307 was qualified for a low MSD recovery. Although the result was not qualified for any other reason, bias was not added to the qualifier. Please explain.</p>	<p>In accordance with the approved guidelines used in validation for volatiles data, bias was not applied. From section VIII.E of the organic National Functional Guidelines "If the MS/MSD %R is <math>\geq 20\%</math> and <math>&lt;</math> lower acceptance limit, qualify detects as estimated (J) and non-detects as estimated (UJ)."</p>
<p>2. Section 3.3.2.1, table reference: Laboratory blank detections that resulted in sample qualifications are reported in Table 11, instead of Table 10, as noted in this section.</p>	<p>Section 3.3.2.1 was updated to reference Table 11 instead of Table 10.</p>
<i>EDD Review</i>	
<p>1. In the results table, there are records with a parameter of "Orthophosphorus as PO4". Please clarify if this is the correct parameter name. Currently the BMI database does not have any other "orthophosphorus" parameter names.</p>	<p>"Orthophosphorus as PO4" was the parameter name reported by the lab. The laboratory confirmed that the reported parameter could be correctly reported as Phosphate. The EDD has been updated to report the "Orthophosphorus as PO4" results as "Phosphate" to conform with current BMI database parameter name and parameter_id combinations.</p>
<p>2. In the results table, there are records with a parameter of "Orthophosphate (as P)" and a parameter_id of "11-36-9-P". In the BMI database, there are standardized names of "Orthophosphate" with a parameter_id of "11-36-9" and "Orthophosphate (as P)" with a parameter_id of "O-PO4".</p>	<p>The EDD has been updated to "Orthophosphate (as P)" with a parameter_id of "O-PO4" to conform with the updated parameter list found on the new BMI database website.</p>
<p>In addition, previous NERT EDDs have also reported "Orthophosphate [as P]" and "Orthophosphate (total) (As P)" as parameter names.</p>	<p>Confirmed. In response to your comment, Trust consultants are working closely together to standardize valid values across the NERT program.</p>
<p>Please check the "Analyte Table" in the BMI database to standardized the parameter names and parameter_ids that you use. This will help clarify that the same analytical results are always reported by the same parameter name and parameter_id in the BMI database.</p>	<p>Thank you for this comment. After contacting Neptune we now have the correct location for the new BMI website and access to the updated standardized parameter list. Please note that the original BMI database website located at the URL <a href="http://ndep.gisdt.org">http://ndep.gisdt.org</a> does not have links to the updated analyte table. Additionally, a banner directing users to the new website could be helpful.</p>

NDEP Comment	Response to Comment
<i>DVSR Review</i>	
	<p>Supporting, unvalidated data including field parameters and microbial results have been combined into the samples, results and locations tables as requested in the April 8, 2019, NDEP Administrative Record comment: "... EDDs have been received with various types of test data in tables separate from the main locations, samples, results, and validation_reason tables. Because these field data may need to be uploaded into the NDEP BMI database, please include the data in the locations, samples, results, and validation_reason tables unless there is a reason not to do so."</p>