

NDEP Comment	Response to Comment
DVSR Comments	
<p>1. <u>Section 8.2.2.1, TPH method blank</u>: Two detects above the PQL were qualified as estimated but had no bias assigned. Please add bias or explain why it was not used.</p>	<p>The qualifiers for TPH results for samples DSPE-7-0.0-20180920 and DSPE-6-1.0-20180920 have been reviewed and updated to J+ to show the bias. The DVSR text, Table V, and EDD have been revised to note the J+ qualifier.</p>
<p>2. <u>Section 9.1.6, dioxin matrix interference qualifications</u>: Text in this section indicates that 44 results were qualified for matrix interference. 47 results in the EDD were qualified and had a reason code of "o." Please investigate this discrepancy and revise either the text or the EDD.</p>	<p>The data have been reviewed and the text in Section 9.1.6 has been revised to indicate that 47 results were qualified for matrix interference.</p>
<p>3. <u>Section 9.2.2, dioxin blank qualifications</u>: Please explain why a 5x rule is used for dioxin qualifications when a 2x rule is used for the other organic analytes.</p>	<p>A 5x rule has previously been used at this site for dioxin qualifications because it provides an understanding of the level of contamination relative to that found in the samples without censoring the data. For this dataset, a 5x rule has been used to ensure comparability with historical data.</p> <p>Section 9.2.2 has been updated to include the following text: "For this data set, five times the blank value was used to assess contaminants for dioxins. This allows the data not to be censored and provides an understanding of the level of contamination relative to that found in the samples. To ensure comparability, this approach is employed for all dioxin data sets associated with the Remedial Investigation collected for the NERT site by Ramboll."</p>

<p>4. <u>Section 11.1.7, wet chemistry Stage 4 counts:</u> The Stage 4 validation sample counts for TOC, ignitability and anions do not match the EDD. Please investigate these discrepancies and revise either the text or the EDD.</p>	<p>The data have been reviewed and it has been confirmed that Stage 4 validation was performed for eight (8) TOC samples, one (1) ignitability sample, and nine (9) anion samples. The EDD includes the correct number of samples; no revisions have been made to the EDD.</p> <p>In the DVSR, the text in Section 11.1.7 has been revised to state that raw data were evaluated for eight (8) soil samples for TOC by EPA SW-846 Method 9060 and one (1) soil sample for ignitability by EPA SW-846 Method 7.1.2. The text notes that raw data were evaluated for "nine (9) soil samples for anions by EPA Method 300.0", which is consistent with the EDD. The DVSR text in Section 11.1.7 was also revised to indicate that raw data were evaluated for one (1) soil sample for pH by EPA SW-846 method 9045C.</p>
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<p>EDD Comments</p>	
<p>1. Please provide the following information and verifications for the obsolete samples.</p> <ol style="list-style-type: none"> a. Verify that the four samples in table "obsolete_samples" should have all dioxin data removed from the database. b. Provide the DVSR/EDD for sample SSAK-05-0BPC. c. Verify that the samples marked as "obsolete" in the samples and results tables should not be uploaded into the database. 	<p>1a. The four samples in the table "obsolete_samples" were collected from soil that has been removed during the soil removal action. For the four samples, all analytical results, including dioxins, should be removed from the database.</p> <p>1b. Results for sample SSAK3-05-0BPC were included in the DVSR/EDD submittal TRONO-2711-2011, which was submitted on April 11, 2011, and approved by NDEP on April 25, 2013.</p> <p>1c. The samples and results marked as "obsolete" were from soil that has been removed from the site and should not be uploaded into the database.</p>