

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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October 29, 2021

Mr. James Dotchin
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Road, Suite 200
Las Vegas, Nevada 89119

RE: Baseline Health Risk Assessment Work Plan Modification for OU-2 Soil Gas
and Groundwater, Revision 1
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dotchin:

The Nevada Environmental Response Trust (NERT) provides the enclosed Baseline Health Risk Assessment Work Plan Modification for OU-2 Soil Gas and Groundwater (BHRA Modification), Revision 1 for Nevada Division of Environmental Protection (NDEP) review and approval. This BHRA Modification has been revised in accordance with NDEP's comments in its October 19, 2021 letter. As requested, an annotated response to comments has also been prepared and accompanies this letter.

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. 3/24/23

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NDEP Comment	Response to Comment
Specific Comments	
<p><u>Specific Comment #1 – Page 2:</u> “All samples collected will be analyzed for a list of target VOCs that were detected at a frequency greater than 85% in previous deeper soil gas samples...” Why 85%? Was this value arbitrarily selected? If not, what is it based on? Please provide justification for such a list.</p>	<p>A footnote was added to provide the justification for the 85% detection frequency threshold. The text was further revised to explain that in addition to comparing the BHRA modeling and individual chemical results, the ratios of different chemical concentrations in the subsurface and indoor air will be compared if chloroform is detected in indoor air at greater concentrations than in ambient air. The analysis of chemical ratios is necessary to distinguish the effects of subsurface sources from indoor or ambient sources on indoor air concentrations.</p>
<p><u>Specific Comment #2 – Page 2:</u> The last sentence appears to be incomplete. Please add: “... and to assess current risk to indoor receptors” to the end of it.</p>	<p>The text was revised to indicate that the indoor air results will be compared to health-based screening levels to confirm that the vapor intrusion risk to residents is within the US Environmental Protection Agency’s acceptable risk range.</p>
<p><u>Specific Comment #3 – Page 3, Footnote 2:</u> “If the home being sampled is not located within 25 feet of an existing soil gas sampling location, two soil gas probes will be installed at a single location adjacent to the home.” Why 25 feet? Was this value arbitrarily selected? If not, what is it based on?</p>	<p>The 25 ft distance was an assumption of the approximate distance between a residence and the property boundary. The text was revised to clarify that new soil gas probes will be installed in the public right-of-way adjacent to the residential property if there are no existing probes in the public right-of-way immediately abutting the property.</p>
<p><u>Specific Comment #4: Page 4, Ambient Air Sampling Procedures:</u> “Two ambient air samples (approximately upwind and downwind) will be collected from outside the home...” Should there be a distance specified here (e.g., approximately ## feet upwind and downwind)?</p>	<p>The text was revised to clarify that the ambient samples will be collected within the property boundary. The exact distance from the home will depend on the size of the property, access considerations, and the wind direction in comparison to the property dimensions. As such, it is not possible to specify a distance between upwind and downwind sample locations. The Trust would like to note that the average property size for single family homes within the two target areas is less than 5,000 square feet with a length generally in excess of four time the width.</p>
<p><u>Specific Comment #5: Page 4, First partial paragraph:</u> It is recommended that vacant houses have their HVAC system run consistent with occupied housing to allow comparability of the collected data.</p>	<p>Agreed. The work plan modification states that the HVAC systems will be operated normally during sampling. The text of the work plan modification was revised to more explicitly state that this statement applies whether the house is vacant or not.</p>