

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 18, 2022

Dr. Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Road, Suite 200
Las Vegas, Nevada 89119

RE: Change in Analytical Laboratory and Methodology for Hexavalent Chromium Analysis
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

This letter serves as an update to the laboratory analysis used for hexavalent chromium sampling performed for the Nevada Environmental Response Trust (NERT or the Trust) Site in Henderson, Nevada (the Site). As you are aware, the forthcoming revision of the Groundwater and Surface Water Monitoring Program Sampling and Analysis Plan (SAP) is being developed by the Trust at the request of the Nevada Division of Environmental Protection (NDEP), in response to the latest comments from NDEP received on August 31, 2022. This letter has been prepared to address changes to the SAP that will be implemented ahead of the forthcoming SAP, Revision 3 submittal and NDEP approval.

Starting on October 24, 2022, Envirogen Technologies, Inc. (ETI) will cease using Eurofins Environment Testing (Eurofins), located in Phoenix, Arizona, as the analytical laboratory for hexavalent chromium to avoid a significant increase in courier prices and to reduce the environmental footprint of shipping samples to Phoenix, Arizona. For reference, approximately 1,020 samples are currently routed to Eurofins within the 24-hour hold time required for hexavalent chromium analysis. Instead, samples included in the SAP to be analyzed for hexavalent chromium will be sent to Pace Analytical National Center for Testing and Innovation (Pace), located in Las Vegas. Pace will use United States Environmental Protection Agency (USEPA) SW-846 Method 7199 - Determination of Hexavalent Chromium in Drinking Water, Groundwater and Industrial Wastewater Effluents by Ion Chromatography. Previously, Eurofins has used USEPA Clean Water Act (CWA) section 304(h) Method 218.6: Determination of Dissolved Hexavalent Chromium in Drinking Water, Groundwater, and Industrial Wastewater Effluents by Ion Chromatography. The methods are nearly identical in that they both use anion exchange chromatography followed by diphenyl carbazide (DPC) post column chemistry and have comparable detection limits. In addition, SW-846 Method 7199 references CWA Method 218.6 and has very similar language and the same method performance tables.

The forthcoming revision of the SAP, inclusive of modifications resulting from NDEP's comments, will document use of Pace and additional details pertaining to SW-846 Method 7199 and the roles and responsibilities of the analytical laboratories.

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October 18, 2022

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



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