

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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December 8, 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: DVSR and EDD Revision 1 for Semi-Annual Groundwater Monitoring and GWETS Performance Sampling July through December 2021
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 (DVSR) associated with the Semi-Annual Groundwater Monitoring and GWETS Performance Sampling July through December 2021 for Nevada Division of Environmental Protection (NDEP) review. This revised DVSR addresses NDEP's comment in your November 9, 2022 correspondence. As requested, an annotated response to comments is attached to 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
DVSR Review	
<p>1. NDEP’s Comment: Sample I-E-20210803 result for Nitrate as N was reported outside the calibration range. Please provide an explanation why the sample was not diluted and reanalyzed.</p> <p>NERT Response: Sample I-E-20210803 was diluted and re-analyzed because the nitrate result for the initial analysis exceeded the calibration range. However, due to the short holding time for nitrate (48 hours), the re-analysis was performed outside the holding time and was not reported in the laboratory report or DVSR. The result of the re-analysis was 32 mg/L, supporting the initial result of 29 mg/L. Because of this and the fact that either result would be considered estimated, the decision was made to retain the original result and not revise the laboratory report or DVSR. No changes have been made to the DVSR.</p> <p>NDEP Response: Since the data reviewer is using professional judgement for choosing the first analysis over the dilution analysis, this explanation must be included in the DVSR.</p>	<p>The following text in italics has been added to Section 3.1.6 of the DVSR to include an explanation for reporting the nitrate result from the initial analysis of sample I-E-20210803:</p> <p>The nitrate as nitrogen result for sample I-E-20210803 was qualified as detected estimated (J). The associated result exceeded the calibration range. <i>The sample was diluted and re-analyzed outside of hold time, but not reported by the laboratory because the result confirmed the original result. Because the laboratory stated the results confirmed each other and either result would be considered estimated, the decision was made to retain the original result and not revise the laboratory report or DVSR.</i></p>