

June 10, 2013

Mr. Weiquan Dong, PE
Bureau of Corrective Actions, Special Projects Branch
Nevada Division of Environmental Protection
2030 E. Flamingo Rd., Suite 230
Las Vegas, Nevada 89119

Re: NERT Response to NDEP April 4, 2013 Comments on Data Validation Summary Report and Electronic Data Deliverables for the Semi Annual Remedial Performance Report for Chromium and Perchlorate, July 2012 to December 2012, dated March 1, 2013

Dear Mr. Dong:

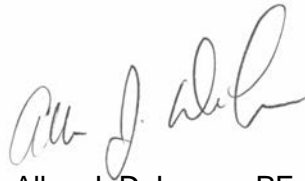
On behalf of the Nevada Environmental Response Trust (the Trust), ENVIRON International Corporation (ENVIRON) has prepared an annotated response to the Nevada Division of Environmental Protection's (NDEP's) comments on the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) included as part of the Semi Annual Remedial Performance Report for Chromium and Perchlorate, July 2012 – December 2012. The comments were included as Attachment A in NDEP's letter to the Trust dated April 4, 2013.

Please contact John Pekala at (602) 734-7710 if you have any comments or questions concerning this response to comments.

Sincerely,



John M. Pekala, CEM #2347
Senior Manager



Allan J. DeLorme, PE
Managing Principal

Attachments

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas
Brian Rakvica, McGinley and Associates, Las Vegas
NDEP c/o McGinley and Associates, Reno

ec: Shannon Harbour, NDEP
JD Dotchin, NDEP
Greg Lovato, NDEP
Stephen Tyahla, USEPA
Rebecca Shircliff, Neptune and Company
Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
Jeff Gibson, AMPAC
Mark Paris, BMI
Lee Farris, Landwell
Ranjit Sahu, BMI
Joe Kelly, Montrose
Paul Sundberg, Montrose

Curt Richards, Olin
Jay Gear, Olin
Ed Modiano, de maximis
Chuck Elmendorf, Stauffer
Nick Pogoncheff, Stauffer
George Crouse, Syngenta
David Hadzinsky, TIMET
Steve Sarandis, GEI Consultants
Kirk Stowers, TIMET
Victoria Tyson, Tyson Contracting (for TIMET)
Enoe Marcum, WAPA

Attachment A

Nevada Environmental Response Trust (“NERT” or “the Trust”) Response to Nevada Division of Environmental Protection (NDEP) April 4, 2013 Comments on Data Validation Summary Report and Electronic Data Deliverables for the Semi Annual Remedial Performance Report for Chromium and Perchlorate July 2012 to December 2012, dated March 1, 2013

The NDEP Comments (numbered and italicized) and Response to Comments (RTCs) from ENVIRON on behalf of the Trust are presented below:

1. *Section 2.2.2 Blanks, and Attachments A and B, this section states, “No Action If a sample result and blank contaminant values were greater than the PQL, the result was not amended.” According to National Functional Guidelines, “no action” should be taken when samples are below the MDL (when blank result is below quantification limit) or when the sample result is 10x the blank result. The statement quoted above does not give enough details as to when no action is taken for blank contamination nor does it appear to agree with National Functional Guidelines. Please clarify this statement and discuss why no action is taken for samples associated with contaminated blanks in Section IV of Attachments A and B.*

Response: The “No Action” statement has been changed to:

If blank contaminant values were less than the PQL and associated sample results were greater than the PQL, or if blank contaminant values were greater than the PQL and associated sample results were greater than 10 times the blank contaminant value, the result was not amended.

Section IV of Attachments A and B have been updated with this revised “No Action” statement.

2. *Section 7.0 References, the last reference may be incomplete. Additionally for the reference to BRC SOP-40, is the Trust should use and reference the latest updated version (v.4, May 2009) to this document. The Trust should also revise these references for consistency in the citations. There were 444 records (non-QC) where sample_top_depth and sample_bottom-depth are blank. The sample_top_depth and sample_bottom_depth fields should be populated.*

Response: The last reference was corrected. The reference to BRC SOP-40 has been updated to Revision 4, May 2009. The references have been revised for consistency.

For 437 records attributed to field samples, the sample_top_depth and sample_bottom_depth fields have been populated with the groundwater well’s top of screen and bottom of screen values. No well screen information is available for sample H-28A_08/08/12, and these fields have been left blank for this one field sample. The six remaining samples are either Equipment Blanks or Field Blanks and

these fields were also left blank. The sample_top_depth and sample_bottom_depth fields will be populated for groundwater well samples in future Deliverables.

3. *Electronic Data Deliverable (EDD), there are 7 records where litho and hydro are blank or NA. The litho and hydro fields should be populated.*

Response: Six of the records are from SF-1 samples, which are not part of the reported sampling event and have been removed from the EDD. The litho and hydro fields have been populated for the remaining record, sample H-28A_08/08/12.

4. *EDD, there are 25 records where the result_reported is blank and the detect_flag_fod is "U". The result_reported field should be populated.*

Response: The result_reported field has been populated for these samples.

5. *EDD, the northing and easting fields are blank for location_id "SF-1". The northing and easting fields should be populated for location_id "SF-1".*

Response: SF-1 samples are not part of the reported sampling event and have been removed from the EDD.