



July 25, 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: *Soil Gas Investigation Report and Health Risk Assessment for  
Parcels C, D, F, G, and H, Revision 0, Nevada Environmental Response Trust Site,  
Henderson, Nevada, July 25, 2013***

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust, this letter transmits the *Soil Gas Investigation Report and Health Risk Assessment for Parcels C, D, F, G, and H, Revision 0* (the HRA), dated July 25, 2013. The HRA follows the methodology presented in the March 2013 Work Plan, and incorporates revisions proposed in the April 9, 2013 comments from the Nevada Division of Environmental Protection (NDEP) on the March 2013 Work Plan. In addition, the HRA includes data analyses specifically requested by NDEP during a February 21, 2013 teleconference.

In addition to an evaluation of risks associated with the inhalation of volatile organic compounds, the HRA presents a summary of cumulative risks to workers considering the inhalation pathways evaluated in this HRA, and the soil pathways evaluated in the Soil HRA, presented in a report prepared by Northgate Environmental Management, Inc. (Northgate), titled *Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G, and H, Revision 2* (Northgate 2013). As presented in the HRA, the cumulative cancer risks for indoor and outdoor commercial/industrial workers are at or below the lower end of the acceptable cancer risk range of  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$  and the cumulative noncancer hazard indices (HIs) are below 1. For the short-term construction worker, the cumulative cancer risks are below the acceptable cancer risk range of  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$  and the cumulative noncancer HI is below 1.

The risk estimates were based on conservative modeling and exposure assumptions that are intended to provide upper-end estimates of risk. Given that the cumulative risk results are at or below the lower end of the acceptable cancer risk range for the receptors evaluated, exposure to chemicals in soil gas and soil in the Study Area parcels should not result in unacceptable risks to future receptors. Based on the HRA results, the Trust requests that NDEP issue a No Further Action letter for Parcels C, D, F, G, and H soils less than 10 feet below ground surface, including vapor intrusion.

Please contact John Pekala at (602) 734-7710 or Allan DeLorme at (510) 420-2565 if you have any comments or questions concerning this report.

Sincerely,

John M. Pekala, PG  
Senior Manager  
Nevada CEM #2347, expires 9/20/2014

Allan J. DeLorme, PE  
Principal

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas  
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