

December 19, 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: Revised Response to NDEP Comment 1 dated August 22, 2013 on NERT's RTC for the Data Validation Summary Report, Revision 2

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (the Trust), ENVIRON International Corporation (ENVIRON) has prepared the enclosed asbestos-only Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) to address the Nevada Division of Environmental Protection (NDEP) Comment 1 provided to the Trust in a letter dated August 22, 2013. Also enclosed is a revision of the previously submitted DVSR, which has been revised to reference the asbestos-only DVSR. Attached is ENVIRON's annotated, revised response to NDEP's original comment.

Please contact John Pekala with any questions at jpekala@environcorp.com or (602) 734-7710.

Sincerely,



John M. Pekala, PG
Senior Manager
Nevada CEM #2347



Allan J. DeLorme, PE
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: James D. 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
Curt Richards, Olin
Jay Gear, Olin
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Chuck Elmendorf, Stauffer
Nick Pogoncheff, Stauffer

George Crouse, Syngenta
David Hadzinsky, TIMET
Kirk Stowers, Broadbent & Associates
Richard Truax, GEI Consultants
Victoria Tyson, Tyson Contracting
Enoe Marcum, WAPA
Ranjit Sahu, BMI
Joe Kelly, Montrose
Paul Sundberg, Montrose
Mark Paris, BMI
Lee Farris, Landwell

Revised Response to NDEP Comment 1 dated August 22, 2013 on: *Data Validation Summary Report Revision 2 for the Interim Soil Removal Action Completion Report, Nevada Environmental Response Trust Site, Henderson, Nevada*
June 2010-November 2011
Dated January 2012

DVSR Comments

1. NDEP Comment, August 22, 2013:

Asbestos data should be validated following NDEP guidance (Data Validation Guidance for Asbestos Data in Soils for the Basic Management Incorporated (BMI) Complex and Common Areas, July 2012) and the modified elutriator method (EPA Method 540-R-97-028 with Berman and Kolk Modifications, 2000). It is not clear how any of the DQO measures (e.g., calibration, accuracy, holding time) were determined for Section 8.0 of the DVSR. For example, Section 8.1.1 points the reader to a metals report for instrument calibration in Section 7.1.1. The two main QC measures listed in the modified elutriator method are duplicates and blanks. Instructions or criteria for calibration or analyte quantitation are not discussed. Blanks are required for analysis per the modified elutriator method.

NDEP Comment, October 10, 2013:

We received new comments on the RTC for DVSR, Revision 3, February to August 2011 Soil Remediation Completion Sampling. Major issue is still DVSR on the asbestos data. This issue happened on the parcels C through H too. I really don't want to see so many iterations on this issue. The BRC had Neptune do DVSR on the asbestos data because Neptune wrote the guidance and they want people to follow it. It is difficult to pass the DVSR without the EPA Level IV laboratory report from EMSL (See comments below):

Neptune & Co., Inc.: These revisions will be fully reviewed once the asbestos data is attained and the DVSR is updated. Note that Section 8 still mentions QC criteria that are not founded and are not listed in the EPA Method 540-R-97-028 with Berman and Kolk Modifications (May 23, 2000). For example, Section 8.1.3 is using a criterion of 5xRL for qualifying field duplicates based on RPD issues. The 5xRL criteria is not listed in the EPA Method and duplicates should be qualified if there is >50% RPD between them. Additionally, there is no reporting limit (RL) for asbestos samples since the results are reported as structure counts; structures are either present or absent. The EDD indicates no asbestos structures were found; therefore, the RPD is not applicable for the duplicate samples if these values are correct. Section 8.2.1 indicates a 28-day holding time for asbestos samples. EPA has established no holding time; however, EMSL recommends that samples be shipped on ice and stored at ice temperature if they are not immediately analyzed to avoid bacterial growth. Section 8.4 mentions SQLs and PQLs for asbestos, these are not applicable and should be removed. As stated above, asbestos structures are either present or absent; an MDL, SQL or PQL is not appropriate for these types of samples. Asbestos concentrations are calculated based on several inputs (e.g. structures, volume of air sampled); however, the asbestos counts are used in the human health risk calculations. Section 8 also mentions a Stage 2A review of data. Note that NDEP requires all data be reviewed to at least Stage 2B and 10% be reviewed to Stage 4. The lack of instrument-related QC data for asbestos samples is understood; however the level of data validation

should not be changed. Section 8 should instead indicate that some QC (e.g., calibration and analyte quantitation) do not apply to asbestos analysis.

NERT Response:

This is a revised response to NDEP's Comment 1 dated August 22, 2013. The necessary lab reports were subsequently received and asbestos results were validated by Neptune & Company following NDEP guidance. The asbestos-only DVSR and EDD are included with this response letter. Also included is a revision of the previously submitted DVSR, which now states that asbestos validation is in the asbestos-only DVSR.