Response to NDEP Comments Dated 05/08/17

Data Validation Summary Report for the Soil Flushing Treatability Study Report

Nevada Environmental Response Trust

NDEP Comment	Trust's Response:
1. <u>Section 1.0 and EDD:</u> 208 results for equipment blanks do not have a valid value for the field "validation_stage". Per NDEP guidance, all data collected at the BMI Complex and Common Areas should be validated at least to Stage 2A. This treatment of equipment blanks is not consistent with previous submissions from NERT. Field and equipment blanks have been validated for the <u>Semi-Annual Remediation Performance Reports</u> and for the combined DVSR for <u>Performance Report, IX, 2016 Q1 Supplemental, 2016 Q2</u> <u>Supplemental, Weir Dewatered Groundwater Characterization, and Seep Well Field Sampling.</u> Additionally, these blank samples require validation to access their usability before they can be used to access site samples. Please validate these samples and revise the EDD and the DVSR as necessary.	Comment noted. All equipment blanks have been validated and the results for the equipment blanks have valid values in the "validation_stage". The EDD and DVSR have been revised to reflect these changes.
2. <u>Section 2.1</u> : Text indicates RPD is calculated from recoveries; however, the equation indicates RPD is calculated from concentrations. Please standardize to one of the other, or indicate RPD can be calculated either recoveries or concentrations, depending on the parameter being assessed.	Comment noted. The text in Section 2.1 has been revised to reflect that RPDs are calculated using concentrations.
3. <u>Section 3.0 hierarchy:</u> Per the National Functional Guidelines (NFG), bias is not applied to nondetected results. Please remove references to UJ- (UJ = U plus J or J-"and" The UJ qualifier is used when a non-detected (U) flag is added to a biased (J-) or unbiased flag (J).")	Comment noted. The cited reference to UJ- has been removed from Section 3.0.
4. <u>Section 3.3.1</u> : There are three results (TT-TP1-L2-20160505, TT-TP3-L1-20160303, TT-TP4-L1-20160310) for hexavalent chromium flagged by the laboratory as having exceeded holding times that are not qualified. Please determine if these results should be qualified. If the laboratory flag was in error, please provide an explanation in the text.	Comment noted. These three samples did exceed holding times and the laboratory flag was not in error. These samples have now been qualified for the holding time exceptions. Table 7 and the EDD were updated to reflect the changes.
5. <u>Section 3.3.1, preservation errors:</u> Please provide details regarding the preservation errors mentioned in this section.	Comment noted. The text in Section 3.3.1 has been revised to clarify that there were no preservation errors.

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6. <u>Section 3.2.2, MS/MSD:</u> Please report the rejected results (analyte and number of rejected results) in the text.	Comment noted. Section 3.2.2 has been revised to reflect the single rejected result with both analyte and number.
7. <u>Table 2, sample analysis counts:</u> None of the analyte counts reported in this table match the EDD. Please determine the source of these discrepancies and correct the Table and/or EDD. (Note: The counts in this table should include the equipment blanks, once validated and the footer to this table should be deleted at that time.)	Comment noted. Table 2 and the EDD have been updated and reconciled. The equipment blanks have been added and the footnote deleted.
8. <u>Table 5, field duplicate qualifications:</u> Qualifications in the EDD do not match Table 5. More samples are qualified in the EDD than reported in the table. 264 results (132 pairs) are qualified in the EDD but only 39 samples are identified in Table 5. Please determine the source of these discrepancies and correct the Table and/or EDD.	Comment noted. Table 5 and the EDD have been revised and now present no discrepancies.
9. <u>Table 6, MS/MSD qualifications:</u> Qualifications in the EDD do not match Table 6. More samples are qualified in the EDD than reported in the table. 246 results are qualified in the EDD but only 81 samples are identified in Table 6. Please determine the source of these discrepancies and correct the Table and/or EDD.	Comment noted. Table 6 and the EDD have been revised and now present no discrepancies.
10. <u>Table 7, holding times qualifications:</u> Qualifications in the EDD do not match Table 7. More samples are qualified in the EDD than reported in the table. 58 results are qualified in the EDD buy only 36 samples are identified in Table 7. Please determine the source of these discrepancies and correct the Table and/or EDD.	Comment noted. Table 7 and the EDD have been revised and now present no discrepancies.
11. <u>Table 8, method blank qualification:</u> The copper result for TT-TP4-M2- 20160211-DUP was qualified in the EDD but this qualification was not listed in Table 8. Please include this qualification.	Agree. Table 8 has been modified to include TT-TP4-M2-20160211-DUP.

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12. <u>Laboratory duplicate qualifications:</u> No table was provided to support these qualifications. Please add a table.	Table 4 has been renamed and revised to include duplicate RPD exceedances.
EDD Review	Trust's Response:
1. There are 1693 records in the results table where the final_validation_qualifier is a "U", but the field final_validation_reason_codes is null. Please provide a reason code for every record that has final_validation_qualifier.	All records with a final_validation_qualifier of "U" in the results table have been updated with a final_validation_reason_code of "nd".
2. The results table has 844 records for soil samples that do not have percent_moisture reported. Provide a percent_moisture for these sample records.	The percent moisture has been populated for all soil samples.
3. In the sample table, the sample_type code of "N" is not in Appendix C of the EDD Guidance. Update the sample_type for these records based on Appendix C.	The EDD has been revised to indicate the normal sample type with "NORM" rather than "N."
4. The fields "matrix" and "sample_type" appear in both the samples table and the results table. These fields should be removed from the results table.	The fields "matrix" and "sample_type" have been removed from the results table.
5. As noted in DVSR comment 1, the field blanks and equipment blanks should be validated. When these samples are validated, please update the validation_flag field as well as the validation_stage field for these records.	The equipment blanks have been validated, the validation_flag field has been indicated as "T", and the validation_stage field has been populated with "Stage 2A."