

NDEP Comment	Response to Comment
DVSR Comments	
<p>1. <u>Section 2.2.2, 7.2.2, and 8.2.2</u>, blank qualification: The text in these sections states that when a result is qualified for an associated blank detect, the result will be qualified as estimated (J). Please edit the text to include the bias which should be applied with the qualifier. The National Functional Guidelines does recommend assigning bias to organic results in some cases of blank contamination (see volatile Section VI.E.4). Please consider this use of bias.</p>	<p>In Section 2.2.2, Volatile Organic Compounds, the following discussion of bias has been added:</p> <p style="padding-left: 40px;"><u>Results Above the PQL</u> If a sample result for the blank contaminant was greater than the PQL and the sample result was less than or equal to 2 times the blank contaminant value, the sample result was qualified as detected estimated (J+) at the reported concentration.</p> <p>No changes were made to Section 7.2.2, Polychlorinated dioxins and Dibenzofurans; per the National Functional Guidelines (2016), there is no bias applied with the qualifier for high resolution methods.</p> <p>In Section 8.2.2, Metals, bias is discussed in the "Results Above the PQL" criterion. The text states:</p> <p style="padding-left: 40px;">If a sample result and blank contaminant value were greater than the PQL and the sample result was less than 10 times the blank contaminant value, the sample result was qualified as detected estimated (J+) at the reported concentration.</p> <p>No data qualifiers were changed and no edits to the EDD were made.</p>
<p>2. <u>Section 5.1.2 and 6.1.2</u>, pesticide and Aroclor internal standards: The last sentence of these section states that the internal standard areas and retention times were acceptable. As laboratories do not regularly employ internal standards for Methods 8081 or 8082, please verify that internal standards were utilized. A review of the EDD table "samples_ LabQCSamples" shows the use of surrogates for these methods but no internal standards. NDEP suggests either contacting the data validator or reviewing the laboratory data packages to ascertain if internal standards were actually used. Otherwise, please provide the laboratory data packages so we can make this determination.</p>	<p>The laboratory Level IV data packages include internal standard peak areas for analytic methods 8081 (Pesticides) and 8082 (PCBs). It is not common for peak area values to be included in analytical laboratory EDDs. As an example, please see pages 2617-2620 and 2882 of the attached Level IV data package, which shows internal standards for pesticides and PCBs, respectively.</p>