

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

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February 11, 2019

Dr. Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

RE: Revised Data Validation Summary Report and Electronic Data Deliverable
Vacuum Enhanced Recovery Treatability Study Supplemental Sampling
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the revised Data Validation Summary Report and Electronic Data Deliverable associated with the Vacuum Enhanced Recovery Treatability Study Supplemental Sampling for Nevada Division of Environmental Protection (NDEP) review. This submittal addresses the comments in your letter dated January 2, 2019 and includes an annotated response to comments.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Remediation Director
CEM Certification Number: 2399, exp. 3/24/19

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NDEP Comment	Response to Comment
<p><i>1. Section 2.3, holding time qualification: Text in this section indicates that samples analyzed past their holding time were qualified as per the National Functional Guidelines (NFG). The qualification recommendations of the current NFG (qualification of result past holding time) are inconsistent with those of the NDEP (qualification of results only once they are past 2x the holding time). Please confirm that results are qualified as per NDEP guidance and update the text in this section to indicate this.</i></p>	<p>The text has been revised to clarify that the data was validated per the NDEP guidance, in addition to the qualifiers and bias recommendations being taken from the National Functional Guidelines. Section 2.3 was updated to state “Sample results for analyses that were performed after the method holding time are qualified according to NDEP requirements. The qualifiers and bias recommendations are taken from USEPA National Functional Guidelines (NFGs), per NDEP guidance”.</p>
<p><i>2. Section 3.5, completeness: As completeness assesses the amount of valid data, it seems this section should appear after all the sections in which data may be rejected have been presented. Recommend moving this section after the discussion of sensitivity.</i></p>	<p>The DVSR summarizes the QA/QC evaluation of the data using precision, accuracy, representativeness, comparability, completeness, and sensitivity (PARCCS), which is the industry standard for laboratory data evaluation. The format of the report follows the PARCCS criteria evaluated. In order to maintain consistency between prior NDEP DVSR submissions and industry standard reporting, the recommended change was not made.</p>
EDD Review	
<p><i>1. In each of the EDDs for NERT VER Treatability and NERT VER Treatability Supplemental, there is a table of field test results. These results will be uploaded to the database with the fields that are provided in the table "field_tests". In addition, the detect_flag_fod and detect_flag_ra will be populated with "D" and the validation_flag will be entered as "F".</i></p>	<p>The EDD was updated to include fields as stated: detect_flag_fod, detect_flag_ra. and validation_flag.</p>