OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee 35 East Wacker Drive - Suite 690 Chicago, Illinois 60601 Tel: (702) 960-4309

May 14, 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: Phase 1 Remedial Investigation Data Validation Summary Report and Electronic Data Deliverable October through December 2014 Soil Data, Revision 3 Nevada Environmental Response Trust Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present Revision 3 of the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) for soil data collected from October through December 2014 as part of the NERT Phase 1 Remedial Investigation (RI). This information is being submitted in response to your letter dated April 16, 2019.

In the Trust's October 8, 2018 Revision 2 submittal, DNR qualifiers were added to address NDEP's comment of August 8, 2018 which stated that each sample should have only one value for each analyte, and other values be qualified "DNR" (Do Not Report). In a December 14, 2018 email exchange between NDEP and the Trust, NDEP confirmed that valid results (i.e., results not rejected due to data validation) for constituents analyzed by multiple methods will be included in DVSRs and EDDs without a "DNR" or "R" qualification. Since Revision 2 contained results for constituents that have been analyzed by multiple methods and were qualified DNR, the DVSR and EDD were inconsistent with how data have been qualified in the past, and how data will be qualified in the future. The 2014 Phase 1 Soil Remedial Investigation DVSR and EDD have been revised to remove DNR qualifiers for samples that have results analyzed by multiple methods, consistent with the December 14, 2018 communication between NDEP and the Trust.

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

Stephen R. Clough, P.G., CEM Remediation Director CEM Certification Number: 2399, exp. 3/24/21

Cc (via NERT Sharefile Distribution):

Jeff Kinder, NDEP, Deputy Administrator Frederick Perdomo, NDEP, Deputy Administrator James Dotchin, NDEP, Chief, Bureau of Industrial Site Cleanup Carlton Parker, NDEP, Bureau of Industrial Site Cleanup Alan Pineda, NDEP, Bureau of Industrial Site Cleanup Christa Smaling, NDEP, Bureau of Industrial Site Cleanup Alison Fong, U.S. Environmental Protection Agency, Region 9 Mark Duffy, U.S. Environmental Protection Agency, Region 9 Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually Brian Loffman, Le Petomane, Inc. Tanya C. O'Neill, Foley and Lardner, LLP Allan DeLorme, Ramboll John Pekala, Ramboll Kim Kuwabara, Ramboll Dan Pastor, Tetra Tech David Bohmann, Tetra Tech

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