

**OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE**

**Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee  
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May 31, 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 Phase 2 Remedial Investigation Data Validation Summary Report and  
Electronic Data Deliverable for July through November 2017  
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 (DVSR) and Electronic Data Deliverable (EDD) for data collected from July through November 2017 as part of the NERT Phase 2 Remedial Investigation (RI). This information is being submitted as requested in your letter dated May 9, 2019. As requested, NERT is also providing annotated responses 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](mailto:steve.clough@nert-trust.com).

Office of the Nevada Environmental Response Trust



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Remediation Director  
CEM Certification Number: 2399, exp. 3/24/21

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| NDEP Comment   | Response to Comment   |
|--|---|
| <b>DVSR Comments</b>   |   |
| <p>1. <u>Introduction, analyte reporting basis</u>: The list of wet chemistry analytes indicates that Nitrite as Nitrogen is an analyte; however, the EDD has 319 results reported as nitrite. Please update the EDD to include the reporting basis for nitrite.</p>                           | <p>Nitrite results have been revised in the EDD to include the reporting basis, and are now reported as "Nitrite as nitrogen".</p>  |
| <p>2. <u>Section 10.1.7, field duplicates</u>: The text states qualifications for field duplicate RPD outliers were applied in 5 field duplicate pairs. Ten results are qualified in four field duplicate pairs. Please revise this sentence for clarity.</p>                                  | <p>The text has been revised to state that results were qualified for four field duplicate pairs. The DVSR now states:</p> <p style="padding-left: 40px;">Ten (10) results in four field duplicate pairs were qualified as detected estimated (J) due to RPDs above the QAPP acceptance criteria. The details regarding the qualification of results are provided in Attachment I.</p>  |
| <p>3. <u>Section 10.2.1, metals holding time</u>: Chromium, reported by Method 200.7 in sample PC-40-20170821, was flagged by the laboratory as having been analyzed beyond the holding time. The result was not qualified during data validation. Please verify the holding time was met.</p> | <p>Method 200.7 requires the sample to be filtered at the time of collection or as soon thereafter as practically possible; the analytical laboratory interprets this requirement as filtering within 15 minutes of sampling. The laboratory flagged the result "HF" (Filter hold-time exceedance) to document that the sample had not been filtered within 15 minutes of sampling. Upon review by the data validator, the result has been qualified "UJ" due to the filter hold-time exceedance. The DVSR text, EDD, and Table V have been revised. The analysis holding time has been reviewed and the sample was analyzed within the holding time of 180 days.</p> |

| <b>NDEP Comment</b>  | <b>Response to Comment</b>  |
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| <p>4. <u>Section 11.2.1, pH holding time:</u> Thirty-one pH results flagged by the laboratory as having been analyzed beyond the holding time were not qualified during data validation. Please verify the holding times were met. (Also note that this section refers the reader to Attachment I, rather than Attachment J.)</p>  | <p>Method 9040C for pH analysis states that samples should be analyzed as soon as possible. The analytical laboratory interprets this requirement as analyzing within 15 minutes of sampling. For the purposes of data validation, a 48-hour holding time from the time of collection is used. This hold time is based on allowing 24-hours for the sample to be received at the laboratory and then allowing 24-hours for the sample to be analyzed after receipt.</p> <p>The laboratory flagged all 241 pH results "HF" (field parameter with a holding time of 15 minutes) to document the analysis was performed at the laboratory, more than 15 minutes after sampling. In the original submittal, 31 pH results that were qualified "HF" by the laboratory, were not qualified during data validation. After reviewing the 31 results, two results (M-204-20171102 and M-220-20171102) have been qualified due to exceeding the 48-hour holding time. The DVSR text, Table V, and the EDD have been revised to include the qualifiers for these two results. The remaining 29 pH results were analyzed within the 48-hour data validation holding time; no changes have been made to these results.</p> <p>Also, the reference to the attachment has been corrected in the DVSR text.</p> |
| <p>5. <u>Radionuclide EDD:</u> In the EDD, radionuclides have the method_detection_limit and sample_quantitation_limit populated with the minimum_detectable_concentration. Neither of these fields need be populated as they are not applicable to radionuclides. Additionally, the practical_quantitation_limit is also populated with the minimum_detectable_concentration. If populated, this field is most similar to the RL reported by the laboratory. Please revise the radionuclide portion of the EDD such that:</p> <ol style="list-style-type: none"> <li>a. method_detection_limit and sample_quantitation_limit fields are null (as these limits are not applicable to radionuclide analyses)</li> <li>b. practical_quantitation_limit may be populated with the "RL" reported by the lab</li> </ol> | <p>For radionuclide results in the EDD, the method_detection_limit and the sample_quantitation_limit fields have been made null. In the electronic data files provided by the analytical laboratory, the "RL" was not provided for radionuclide results, therefore the practical_quantitation_limit field has been made null in the EDD.</p>  |

| <b>NDEP Comment</b>  | <b>Response to Comment</b>  |
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| <b>EDD Comments</b>  |   |
| 1. The filtered_flag field in the results table has been updated to "TOTAL" and "DISSOLVED" in the revised EDD Guidance. This update should be reflected in all future EDDs.     | In the EDD, the filtered_flag column has been updated to use the values "TOTAL" and "DISSOLVED". Future EDDs will use these values.   |
| 2. There are multiple records in the results table where percent_moisture=0 and the matrix is soil. Please verify that these records should have "0" in this field.              | Results that had a percent moisture of zero (0) have been reviewed. For trip blank results, percent_moisture is not applicable and has been made null. The percent_moisture field has been populated for all other soil results that had previously contained a percent moisture value of zero (0).   |
| 3. In the results table, there are multiple records where the method_detection_limit is greater than the sample_quantitation_limit. Please review these records and update them. | The sample_quantitation_limit (SQL) is the method_detection_limit (MDL) that has been adjusted to reflect sample specific variations such as dilution, a smaller or larger sample size, or moisture content. In the EDD, results where the MDL is greater than the SQL have been reviewed. Due to a higher sample volume, the calculation of the SQL resulted in a value below the MDL. The higher sample volumes were within acceptable ranges and the SQLs have been determined to be correct. No edits were made to the EDD. |
| 4. See DVSR comment #5.  | For radionuclide results in the EDD, the method_detection_limit and the sample_quantitation_limit fields have been made null. In the electronic data files provided by the analytical laboratory, the "RL" was not provided for radionuclide results, therefore the practical_quantitation_limit field has been made null in the EDD.   |