

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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June 26, 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 February through June 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 February through July 2017 as part of the NERT Phase 2 Remedial Investigation (RI). This information is being submitted as requested in your letter dated April 29, 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.

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
DVSR Comments	
<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 lists this analyte as nitrite. Please update the EDD to include the reporting basis for nitrite.</p>	<p>Nitrite as Nitrogen results have been revised in the EDD to include the reporting basis, and are now reported as "Nitrite as N".</p>
<p>2. <u>Section 2.0, equipment blanks and trip blanks:</u> The text states there are "fifty-one equipment blanks and trip blanks"; however, there are more than 51 samples appended with EB, FB, TB or EBTB. Please assess the report and EDD and determine which is correct.</p>	<p>In Section 2.0, the mention of 51 equipment blanks and trips blanks is to note the number samples that were reported with 69 VOCs and not the target analyte list of 68 VOCs. To clarify, the DVSR text has been revised to the following:</p> <p style="padding-left: 40px;">Of all of the equipment blanks and trip blanks associated with soil samples, 51 were reported with 69 VOCs (Freon-113 was added due to a laboratory oversight). All other field and field QC samples analyzed for VOCs were reported with the correct number of analytes per the QAPP.</p>
<p>3. <u>Section 8.2.1, broken lid and broken container:</u> Samples RIDB-14-30.0-20170223 was received with a broken lid and sample RIDB-8-30.0-20170222-FD was received broken. How was it determined there was no cross-contamination?</p>	<p>Soil sample RIDB-14-30.0-20170223 was received with a broken lid. The analytical laboratory inspected the sample; no spillage of the soil sample was seen and no apparent cross-contamination from the broken sample was observed. The laboratory replaced the lid on the container and proceeded with analysis. No data were qualified.</p> <p>The sample jar for field duplicate soil sample RIDB-8-30.0-20170222-FD was broken during shipment to the laboratory. The sample was not able to be recovered. The laboratory sub-sampled the parent sample, RIDB-8-30.0-20170222, to analyze as a field duplicate. Since the results for RIDB-8-30.0-20170222-FD are not representative of a true field duplicate, they have been qualified "R" as rejected. The DVSR text in Section 8.0, Section 8.2.1, Table V, and the EDD have been revised.</p>

<p>4. <u>Section 14.4, rejected results:</u> While the metals had a completeness of greater than 90%, 57% of the niobium results were rejected. How does this affect data quality?</p>	<p>The previously rejected niobium results were reviewed. The results had been rejected due to a grossly exceeded MS/MSD percent recovery (e.g. <30%). Upon review it was determined the MS/MSD were diluted due to the nature of the sample matrix, and were analyzed at greater than or equal to a 5X dilution. At these levels of dilution, the spike concentration of niobium was below the PQL which made the percent recoveries unreliable.</p> <p>Because the MS/MSD percent recoveries are unreliable, they will not be used to assess accuracy or to qualify the niobium results. The previously rejected niobium results are now reported and are not rejected. No niobium results have been rejected. In Sections 9.4 and 14.4, metals are reported with 100% completeness. Section 9.1.2 has been revised to note that no niobium data were qualified due to the exceeded MS/MSD percent recoveries.</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"> a. method_detection_limit and sample_quantitation_limit fields are null (as these limits are not applicable to radionuclide analyses) b. practical_quantitation_limit may be populated with the "RL" reported by the lab 	<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>
<p>EDD Comments</p>	
<p>1. The records in the results table that have a final_validation_qualifier of "DNR" have a final_validation_reason_codes of "orr". All final_validation_reason_codes should be defined in the validation_reason table, so "orr" should be added to this table.</p>	<p>In the EDD, the reason code "orr" has been added to the validation_reason table.</p>

<p>2. There are multiple records in the results table where the method_detection_limit is greater than the sample_quantitation_limit. Review these records to verify that these limits are correct.</p>	<p>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.</p>
<p>3. The filtered_flag field has been updated to "TOTAL" and "DISSOLVED" in the revised EDD Guidance. This update should be reflected in all future EDDs.</p>	<p>In the EDD, the filtered_flag column has been updated to use the values "TOTAL" and "DISSOLVED". Future EDDs will use these values.</p>