OFFICE OF 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 Seep Well Field Area Bioremediation Treatability Study Data Validation
        Summary Report and Electronic Data Deliverable
        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) associated with the Seep Well Field Area Bioremediation Treatability Study. This information is being submitted as requested in your letter dated May 31, 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

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

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NDEP Comment	Response to Comment
1. *Section 1.0, sample number:* The last sentence of the first paragraph indicates there are a total of 866 samples assessed in this DVSR; however, the EDD has a total of 890 samples. Please revise either the text or EDD to resolve this inconsistency.	The DVSR EDD includes 24 samples collected for supporting data that were not validated and 866 samples collected with laboratory analyses that were validated. The text has been revised to clarify the sample numbers. The EDD has been revised to include additional queries that display the sample distribution of validated and unvalidated data to aid in review.
2. *Table 1, pH:* There are 7 pH results by Method 9045C with a validation_flag of "F." Please confirm these results were not validated.	Confirmed. The seven pH results by Method 9045C with validation_flag of "F" were not validated because they were analyzed as part of the geotechnical supporting data. The sample numbers included in Table 1 are for validated samples only.
3. *Table 1, analyte names:* In table 1, phosphorous is denoted as "Phosphorus, Total"; however, in the EDD it is "Phosphorus." As the name in the table contains more information, please revise the EDD for consistency.	The EDD has been revised accordingly. The parameter field has been changed to "Phosphorus, Total".
EDD Review	
1. In the samples table, the records associated with location_id="COH-2B1" are missing the sample_top_depth, sample_bottom_depth, litho, and hydro entries.	COH-2B1 is a legacy well and not all information is available. The EDD has been revised to include sample depths and hydro entries.
2. In the results table, there are records with analytical_suite of "NTOTAL" and "SM4500-H+", which are not in Appendix E of the current EDD Guidance. These records should have an analytical_suite="GENERAL". However, we will accept the analytical_suite entries of "Microbial" and "Physical Properties" because these are new categories under this field.	The EDD has been revised. The analytical_suite designations have been corrected from "NTOTAL" and "SM4500-H+" to "GENERAL".
3. There are records in the results table for Total Dissolved Solids where the associated matrix is SO (soil) and the result_units are mg/L or ug/L. As this creates a matrix/units mismatch in the database, please change the analytical method to include "soluble," as this would provide sufficient information to verify the units are correct.	In the EDD, the analytical_method for Total Dissolved Solids in soils is shown as "SM2540C-soluble", therefore no change was made. After review, the analytical_method for soil pH in the unvalidated results was updated to "SW-9045C-soluble" in order to be consistent with the validated results.
4. There are records in the results table where the detect_flag_fod and the detect_flag_ra do not match each other and these records are not for radionuclides. These two detect_flag fields should be the same unless analytical_suite="RADS".	Agree. The detect_flag_fod was updated from "D" to "U" in 34 unvalidated microbial results and now match the detect_flag_ra for those records.