

**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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February 14, 2020

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: Data Validation Summary Report and Electronic Data Deliverable  
Phase 2 Remedial Investigation, March 2018 through March 2019 Data, Revision 1  
Nevada Environmental Response Trust  
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) for data collected from March 2018 through March 2019 as part of the Phase 2 Remedial Investigation, Revision 1 for Nevada Division of Environmental Protection (NDEP) review. This DVSR/EDD submittal is the third of four anticipated DVSR/EDD submittals planned to report data collected as part of the Phase 2 Remedial Investigation. The remaining Phase 2 Remedial Investigation DVSR/EDD submittal will contain asbestos results. This information is being submitted as requested in your letter dated January 3, 2020. 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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NDEP Comment	Response to Comment
<b>DVSR Comments</b>	
<p>1. <u>Section 1.0, methods list</u>: There are two discrepancies between the methods list in this section and the EDD: 1) the EDD also has Orthophosphate (total)(as PO4) listed as an analyte in Method 300.0; and 2) in the EDD, the method for ferrous iron is SM 3500 and not SM 3500-FE D.</p>	<p>The discrepancies between the methods listed in Section 1.0 of the DVSR and the EDD have been reviewed. The following revisions have been made: 1) The DVSR text in Section 1.0 has been revised to include Orthophosphate as Phosphate in the list of parameters for EPA Method 300.0, and 2) The EDD has been revised to list the method for ferrous iron as SM 3500-FE D.</p>
<p>2. <u>Section 1.0, TO-15 and TO-15 VOL results</u>: As TO-15 and TO-15 VOL report the results of the same sample/analysis in different units. Although it is noted that at least one other NERT DVSR/EDD has reported both sets of results, it seems that only one set should be reported and loaded to the BMI database so there are no identical results in the database. Is there a reason to keep one set as opposed to the other?</p>	<p>The results of the same sample/analysis are reported in multiple units because the conversion between <math>\mu\text{g}/\text{m}^3</math> and ppbv is chemical-dependent based on molecular weight. Reporting both sets of units allows for greater comparison with other data sets that may only be reported in one unit or the other. However, future NERT risk assessments will be relying on the data in units of <math>\mu\text{g}/\text{m}^3</math>, so it is preferable to load these data into the BMI database over the data in units of ppbv. If desired by NDEP, future NERT DVSR/EDD submissions can omit data in units of ppbv if data in units of <math>\mu\text{g}/\text{m}^3</math> are also available.</p>
<p>3. <u>Section 1.0, precision and accuracy, page 3</u>: The text defines an SRM as "sample reference material." Please correct this to "standard reference material."</p>	<p>The DVSR text has been updated in Section 1.0 to define SRM as "standard reference material", consistent with the acronyms list.</p>
<p>4. <u>Section 14.0, metals sample count</u>: The text notes there are 44 water samples analyzed by 200.8 for arsenic; however, the EDD had 53 samples. Please confirm the number of samples analyzed by 200.8.</p>	<p>The data have been reviewed and it has been confirmed that there were 44 water samples analyzed by 200.8 for arsenic. The result count for arsenic is 53 because it includes 13 samples with only total arsenic results reported, 22 samples with only dissolved arsenic reported, and nine (9) samples with both total and dissolved arsenic results reported. Counting these nine samples twice since each has two separate results (total and dissolved) gives a total result count of 53. No edits to the DVSR text or EDD were made.</p>
<p>5. <u>Section 14.1.7, field duplicate qualifications</u>: The qualifications noted were in 4 field duplicate pairs instead of 3, as noted in the text. Please confirm and correct as necessary.</p>	<p>The data have been reviewed and it has been confirmed that there are eight (8) results in three (3) field duplicate pairs qualified as detected estimated "J" due to field duplicate qualifications. These results and duplicate pairs are listed below:</p> <ul style="list-style-type: none"> <li>- PC-155A-20181115/PC-155A-20181115-FD for aluminum and iron analyzed by EPA 200.7</li> </ul>

<b>NDEP Comment</b>	<b>Response to Comment</b>
	<ul style="list-style-type: none"> <li>- PC-156B-20180530/PC-156B-20180530-FD for iron analyzed by EPA 200.7</li> <li>- RISB-5-0.5-20181218/RISB-5-0.5-20181218-FD for arsenic analyzed by EPA S-846 Method 6020A</li> </ul>
<p>6. <u>Section 15.0, sample counts</u>: Please check the following discrepancies in the analyte/sample counts:</p> <ul style="list-style-type: none"> <li>a. The text reports 95 soil samples analyzed by 300.0, but the EDD has 90.</li> <li>b. The text reports 173 soil samples analyzed by 314.0, but the EDD has 174.</li> <li>c. The text reports 59 soil samples analyzed by SM4500-NH3, but the EDD has 74.</li> </ul>	<p>The data have been reviewed for the following discrepancies:</p> <ul style="list-style-type: none"> <li>a. A total of 90 soil samples were analyzed for anions by EPA Method 300.0. The DVSR text in Section 15.0 has been revised.</li> <li>b. It has been confirmed that there were 173 soil samples analyzed by EPA Method 314.0. One result qualified DNR (Do Not Report) for RIDB-30-130.0-20181009 is listed in the EDD and should not be included in the count. No revisions have been made.</li> <li>c. It has been confirmed that there were 59 soil samples analyzed by SM 4500-NH3D. The 74 value is the count of the results for soil samples analyzed by SM 4500-NH3D, which includes ammonia results reported as both N and NH3 for 15 samples. No revisions have been made.</li> </ul>
<p>7. <u>Holding time qualifications</u>: There are 21 results for Method 8260B that were qualified by the laboratory as having exceeded the holding time. None of these results were qualified in validation. Please confirm these results do not require qualification.</p>	<p>The 21 results for Method 8260B that were qualified for holding time exceedances by the laboratory were reviewed. All of the samples were analyzed within the 14-day holding time for soil samples analyzed by Method 8260B with preparation Method 5035A. The laboratory reports for Sample Delivery Groups 440-227679-1 and 440-227911-1 were revised to remove the laboratory qualifiers. The EDD was also revised to remove the laboratory qualifiers for holding time exceedances.</p>
<p>8. <u>Results above the calibration</u>: The result for PCB 209 in sample RISB-02-1.0-20180924 that was qualified by the laboratory as having been reported above the calibration. This result is not qualified. Please confirm this result does not require qualification.</p>	<p>The result for PCB 209 in sample RISB-EJ-02-1.0-20180924 was reviewed and the result should have been qualified "J" due to the calibration range exceedance. The DVSR text in Section 13.1.6, Table V, and the EDD have been updated to include this qualifier.</p>
<b>EDD Comments</b>	
<p>1. In the samples table, sample M-39R-20190109 is null for litho. Please provide the litho information if available.</p>	<p>The lithology for M-39R in the samples table has been added.</p>

<b>NDEP Comment</b>	<b>Response to Comment</b>
2. Numerous records in the results table have a method_detection_limit greater than the sample_quantitation_limit. Please check the entries in these two fields.	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.