

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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November 9, 2021

Dr. Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Road, Suite 200
Las Vegas, Nevada 89119

RE: Revised Data Validation Summary Report and Electronic Data Deliverable for
2020 Annual Groundwater Monitoring and GWETS Performance Report
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 and Electronic Data Deliverable associated with the 2020 Annual Groundwater Monitoring and GWETS Performance Report for Nevada Division of Environmental Protection (NDEP) review. As requested in your September 16, 2021 correspondence, please also find attached an annotated response to comments for your review.

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. 3/24/23

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NDEP Comment	Response to Comment
DVSR Comments	
1. <u>4.0 Metals:</u> DVSR states there are 724 chromium results. The EDD shows 730 results. Please provide reason for the difference.	The DVSR states that 724 samples were analyzed for only chromium, and that 6 samples were analyzed for chromium in combination with other metals. The EDD and DVSR are therefore consistent with a total of 730 chromium results. To improve clarity, the DVSR has been revised to only refer to the number of results in each section, not the number of samples analyzed by each method.
2. <u>5.0 Wet Chemistry:</u> DVSR states there are 678 anion results. The EDD shows 691 results (one nitrate result as DNR) and the Completeness Table in 7.4 shows 690 results. Please provide reason for the difference.	The DVSR states that 678 samples were analyzed for anions. All 678 samples were analyzed for nitrate, but six samples were also analyzed for two other anions each (chloride and either sulfate or nitrite), leading to an additional 12 results, for a total of 690 results. The one nitrate DNR result is not counted in the completeness total, so the DVSR and EDD are consistent. To improve clarity, the DVSR has been revised to only refer to the number of results in each section, not the number of samples analyzed by each method.
3. <u>Table III – Stage 2a Validation Stage Percentages:</u> The total results for anions is 678, the EDD shows 691 results (one nitrate result as DNR). The total results for chromium is 724. The EDD shows 730 results. Please provide reason for the difference.	The numbers in Table III are the number of samples, not the number of results. As stated in the prior two responses, these numbers are consistent between the DVSR and EDD. To improve clarity, Table III has been revised to show the total number of results by parameter or suite rather than the number of samples.
EDD Comments	
1. In the samples table, samples MW-02-20200521, MW-20-20200521, and MW-25-20200521 have matrix=WG, but do not have an entry for "litho". Provide the litho for these samples or a reason that litho was not provided.	These wells are not owned by NERT and lithologic information is not available for these wells in the All-Wells Database. The EDD has been revised to include a sample remark stating that lithologic information is not available.
2. No NDEP Comment	The analytical laboratory has issued a letter and revised laboratory reports stating that the reported results for Total Organic Halides were in error by a factor of 2 due to an incorrect dilution calculation. The EDD has been revised to include the correct results, and the letter and revised laboratory reports are provided with this submittal.