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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August 9, 2024

Mr. Chad Schoop, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Road, Suite 200
Las Vegas, Nevada 89119

RE: Data Validation Summary Report, Revision 2
8th Street Investigation and Focused Health Risk Assessment
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Schoop:

The Nevada Environmental Response Trust (NERT) is pleased to present the Data Validation Summary Report, Revision 2 associated with the investigation of 8th Street for Nevada Division of Environmental Protection (NDEP) review. The attached DVSR and EDD have been revised in accordance with NDEP's June 17, 2024 comments. As requested, NERT has also prepared an annotated response to comments summarizing the revisions addressing NDEP's 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

Stephen R. Clough, P.G., CEM
Remediation Director
CEM Certification Number: 2399, exp. 3/24/25

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NDEP Comment	Response to Comment	NDEP Comment	Response to Comment
1. Attachment A, Section IV - Continuing Calibration			
1. Benzoic acid and Hexachlorocyclopentadiene %D are greater than 20%. There is no indication of low or high recovery of the continuing calibration relative to the spike level. Non-detect results for Benzoic acid are qualified as estimated, UJ, whereas non-detect results for Hexachlorocyclopentadiene are not qualified as estimated, UJ. Please explain the discrepancy.	The continuing calibration verification (CCV) recovery was low for benzoic acid and non-detect results were qualified "UJ" as estimated non-detect. The recovery for hexachlorocyclopentadiene was high for the CCV and the analyte was not detected in any of the associated samples; therefore, non-detect results were not qualified for a potential bias. Therefore, no changes to the DVSR are required.	The NERT response does not address the comment. In section 3.1.1, second paragraph, there is no direction of bias mentioned to confirm the reason why no qualifiers are applied. Please include the direction of bias (low or high). In section 3.1.1, third paragraph, there is no direction of bias mentioned to confirm the reason to qualify benzoic acid results as UJ and no qualification for hexachlorocyclopentadiene. Please include the direction of bias (low or high) as the reason for qualifying, or not qualifying results. Similarly, no bias is indicated in Appendix B, Section IV. Continuing Calibration. Please include the bias for confirmation.	The text in Section 3.1.1 has been revised to include the %D bias directions for hexachlorocyclopentadiene (biased high) and benzoic acid (biased low). Appendix B has been revised to include a "-" bias sign for the benzoic acid %D.
2. Attachment H, Section II - Initial Calibration and Initial Calibration Verification			
2. There is no indication of low or high recovery of the ICV. Example, Demeton-O recovery is 103.6% and Demeton-S recovery is 87.8%, both are greater than 20%. However, Demeton-O receives no flagging while Demeton-S receives a qualifier UJ for affected results. Both ICV recoveries appear to be positive or high recovery. Please explain why some results are qualified and others are not qualified. Methyl parathion ICV percent difference is >20%. The appearance is the ICV was recovered high. Should the results for methyl parathion be qualified as UJ when the recovered amount in the ICV is higher than the spike level?	The recoveries for Demeton-O were high and the recoveries for Demeton-S were low; therefore all non-detect results for total Demeton (Demeton-O + Demeton-S) were qualified "UJ" as estimated non-detect. The recovery for methyl parathion was low for the ICV; therefore the associated non-detect results were qualified "UJ". Therefore, no changes to the DVSR are required.	The NERT response does not address the comment. Similar to the discussion above Please include the direction of bias. The percent difference does not indicate if the recovery was low or high. Please include discussion regarding the nature of the outlier, whether the percent difference is a result of a low or high recovery of the analyte in the ICV.	The text in Section 9.1.1 has been revised to indicate the bias was low for the %Ds associated with qualified results for organophosphorus pesticides. Appendix H has been revised to include a "-" bias sign for analytes that had %Ds with low biases.