NEVADA DIVISION OF
ENVIRONMENTAL
PROTECTION

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

December 14, 2018

Harry Van Den Berg
AECOM
1220 Avenida Acaso
Camarillo, CA 93012

Re: Nevada Division of Environmental Protection (NDEP) Response to: *Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) from the May 2018 Surface Water Sampling, Rev. 0 for the NERT Remedial Investigation Downgradient Study Area, Nevada Environmental Response Trust Site, Henderson, Nevada*

Dear Mr. Van Den Berg,

The NDEP has received and reviewed the above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted by **January 31, 2018** based on the comments found in Attachment A. AECOM should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

Please contact the undersigned with any questions at alan.pineda@ndep.nv.gov or 702-486-2850 x247.

Sincerely,

Alan Pineda

Alan Pineda, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

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Weiquan Dong, NDEP BISC Las Vegas
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Allan Delorme, Ramboll Environ
Alison Fong, U.S. Environmental Protection Agency, Region 9
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Chris Ritchie, Ramboll Environ
Chuck Elmendorf, Stauffer Management Company, LLC
Dave Share, Olin

David Johnson, Central Arizona Water Conservation District
Dave Johnson, LVVWD
Derek Amidon, Tetratech
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, Inc.
Eric Fordham, Geopentech
Dan Pastor, P.E. TretraTech
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
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Kirsten Lockhart, Neptune & Company Inc.
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Kurt Fehling, The Fehling Group
Kyle Gadley, Geosyntec
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Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
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Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

DVSR Review

1. Sections 1.0 and 1.1, references:
    a. Please note that the July 13, 2018 Data Validation Guidance letter encompasses all previous data validation guidance, including blank qualification. Older NDEP data validation guidance need not be cited.
    b. Please cite and use the most recent National Functional Guidelines (2017).
    c. Please include the NDEP data validation guidance when identifying the documents used to validate the data (page 1-2, paragraph above the qualifier definitions; page 1-3, third paragraph, page 1-4 next to last paragraph).
    d. EPA 2004 is cited as the basis for the assessment of holding times and holding time qualifications. Please note this is the same criterion as required in the current (July 13, 2018) and previous NDEP guidance. Please cite the NDEP guidance instead of EPA. (Also, please note that the July 2018 Groundwater Sampling DVSR cites the 2017 National Functional Guidelines as the basis for this requirement.)

2. Section 1.1, RPD calculation: The RPD calculation should be corrected to change "200%" to "100."

3. Section 1.1, precision: Matrix interference is not usually cited as a cause of poor precision, as the matrix generally affects both samples of a duplicate pair in the same manner.

4. Section 1.1, sensitivity: The text states that the SQLs have been adjusted for sample-specific actions. In the EDD, it is the MDLs instead of the SQLs that have been adjusted for dilution factors. Please review these fields (method_detection_limit, sample_quantitation_limit, and dilution_factor) and correct the EDD as necessary. (Please note this also occurred in the July 2018 Groundwater Report).

5. Section 4.1, precision and accuracy: The text notes that precision and accuracy were evaluated using calibration. As calibration was not evaluated, please edit this sentence to remove this reference.

6. Section 4.4, completeness: Please verify the number of chlorate results presented in this table. The EDD has 87 chlorate results for field samples (not including field blanks, equipment blanks or field duplicates).

EDD Review

1. In the locations table, there are multiple locations that have 0 for northing and easting. Each location_id should have a non-zero easting and northing entry.

2. In the locations table, each location_id must be unique. The locations "LW3.4" and "LWC3.7" are each repeated in the locations table three times with a different set of northing and easting each time. If each of these locations are different, then assign a unique

location_id to each set of northing and easting. If the three locations for each of these location_ids are really the same, then there should be one record for each with one set of northing and easting.

3. In the results table, the validation_flag should be T or F. Update the entries of "-1" to either T or F.