



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

December 17, 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 July 2018 Groundwater 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, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

EC:

James Dotchin, NDEP BISC Las Vegas
Weiuan Dong, NDEP BISC Las Vegas
Alan Pineda, NDEP BISC Las Vegas
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, Tetrattech
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.
Jay Steinberg, Nevada Environmental Response Trust
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Kevin Fisher, LV Valley Water District
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
Kyle Gadley, Geosyntec
Kyle Hansen, Tetrattech
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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 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).
 - c. EPA 2017 is cited as the basis for the assessment of holding times and holding time qualifications. This version of the National Functional Guidelines does not use the 2× rule and requires qualification of results if the holding time is exceeded at all. Please note that the holding time schema discussed is the same as required in the current (July 13, 2018) and previous NDEP guidance. Please cite the NDEP guidance instead of EPA.
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: As commercial environmental laboratories report “MDLs” that have been adjusted for sample-specific parameters, please edit the sentence that states the laboratory reports results down to the MDL to state that results are reported down to the SQL.
5. Section 2.2.2.2, ED detects: The text in this section states that there were no analytes detected in the EBs of FBs; however, chloride was detected in NERT4.93S1-20180710-EB. Please edit the text in this section to address this detect.

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 samples table, the litho and hydro fields are null. For groundwater samples, these fields should be populated.
3. In the samples table, the sample_top_depth and sample_bottom_depth are 0 for all samples. These depths should be populated for all groundwater samples if the information is available.
4. In the results table, the validation_flag should be T or F. Update the entries of “-1” to either T or F.