



environmental management, inc.

From: Derrick Willis

Date: July 21, 2010

To: Shannon Harbour, PE
Nevada Division of Environmental Protection

RE: Response to Nevada Division of Environmental Protection's July 6, 2010
Comments on *Data Validation Summary Report for Shallow Supplemental Soil
Sampling in Areas I and II*, dated June 15, 2010

Response to Comments

Northgate Environmental Management, Inc. (Northgate) submits this Response to Comments on the *Data Validation Summary Report Shallow Supplemental Soil Sampling in Areas I and II* (DVSR) on behalf of Tronox LLC. Tronox has reviewed the July 6, 2010 Nevada Division of Environmental Protection (NDEP) comments and responds accordingly.

Comments

1. *Table 1-5, this table is missing the holding time requirements for Perchlorate. Please revise.*

Response: Table 1-5 was amended to include the analytical hold time for perchlorate by Method 314.0 for both aqueous and soil matrix. The revised Table 1-5 is on page 4 of the DVSR text.

2. *EDD Database, NDEP has the following comments:*

- a. *General format comments:*

- i. *Clarify the difference between the results:Table and the resultsV4:Table.*
- ii. *The validation_reason table is missing.*
- iii. *The field name "percent__moisture" in the samples table has two underscores, this should be percent_moisture.*

Response: The Electronic Data Deliverable amendments for the Revised Shallow Supplemental Soil Sampling DVSR were made in accordance with the NDEP-Required EDD, format, dated July 7, 2010.

- a.

- i. The original validation work table "Table" has been removed and replaced with the revised "results table" per the July 7th EDD guidance.
- ii. The Validation_Reason table has been added to the revised EDD submittal.
- iii. The percent moisture field name has been amended to include one underscore.



b. Please address the following:

- iv. Results and Samples Tables, sample_id_field EB121109-SO-A1 found in results table is missing from samples table
- v. The results:Table has 4478 results where validation_stage is null, this is not the case for the resultsV4:Table.
- vi. In the results:Table, the final_validation_reason_code and final_validation_qualifier are always null, this is not the case for the resultsV4:Table.
- vii. For both the results:Table and the resultsV4:Table, there are 103 results where sql and pql are null
- viii. For both the results:Table and the resultsV4:Table, there are 77 non-detect results have null result values
- ix. There are many results which have a final_validation_qualifier but no reason code. These all appear to be non-detects, (results is < SQL, detect flag = F). This requirement for either both fields null or both fields populated is consistent with the latest EDD Guidance. We suggest a new reason code be added that will apply to these true non-detects.

Response: The items listed were addressed in the revised EDD submittal for the Revised Shallow Supplemental Soil Sampling DVSR in accordance with the NDEP-Required EDD format, dated July 7, 2010.

b.

- iv. The equipment blank EB121109-SO-A1 listed in the sample_id_field is not part of the Shallow Supplemental Soil Sampling and was removed from the results table in the revised EDD submittal.
- v. The original validation work table was removed from the revised EDD submittal and the results table validation stage populated correctly.
- vi. The revised results table was amended per the new EDD guidance. The final_validation_reason_code and the final_validation_qualifier fields are now populated correctly.
- vii. Surrogate results which do not have sample quantitation limits (SQL) or practical quantitation limits (PQL), have been removed from the revised results table. The calculated toxicity equivalency value for Dioxin Method 8290 results will remain null for the SQL and PQL field where it is not applicable.
- viii. The revised results table was amended to include data values for all non-detects.
- ix. The revised result table was amended to include the new reason code "nd" for all qualified non-detected values previously null. The new validation reason code "nd" was also added to the validation reason code table.

