

NDEP Comment	Trust's Response:
<p>1. <i>The equipment blank results have now been validated; however, there are 149 equipment blank results with a "U" qualification but no associated reason code. Please update the EDD to include the appropriate reason codes for these results.</i></p>	<p>Comment noted. The EDD has been updated with the "nd" reason code applied to the 149 equipment blank results with "U" qualification that had no associated reason code.</p>
<p>2. <i>Table 6 and EDD: The number of qualifications now agree; however, as the number of qualifications in the EDD changed markedly, from 246 to 67, please identify the reason so many fewer results are now qualified. (No revision to the DVSR is requested.)</i></p>	<p>Comment noted. The original EDD submission included validation qualifiers and reason codes applied by the Automated Data Review (ADR) software, which uses the most conservative set of rules without the benefit of professional judgment. After further chemist review, the EDD was revised to remove qualifiers that did not fit those rules. Qualification was removed in several cases involving matrix spike (MS) recoveries and Field Duplicate (FD) precision. For matrix spike recoveries, if the analyte was present in the parent sample at a concentration greater than 4 times the amount spiked, no qualification was required. For parent sample and FD precision using relative percent difference (RPD), the ADR limits were set at 30% for both soil and water. Acceptable RPD for soil parameters is 50%. Also, the original qualifier and reason code were applied by using RPD only. For results < 5X the practical quantitation limit (PQL), they should have been evaluated by the difference between the two measurements. Also, for non-detects (NDs), the ADR set the concentration as zero, not as the reporting limit (RL). All precision calculations with NDs were reevaluated.</p>
<p>3. <i>EDD: Two records in Rev 1 are missing validation_reason_codes. Sample TT-TP3-L2-6 for chlorate was qualified as UJ with validation_reason_code="fd" and is now qualified as U with no validation_reason_code. Sample TT-TP2-B3A-14 for chloride was qualified as J+ with validation_reason_code="fd,m" and is now qualified as J with no validation_reason_code. Please verify these changes and provide a validation_reason_code for each record.</i></p>	<p>Comment noted. Sample TT-TP3-L2-6 for chlorate: The original qualifier and reason code were applied by the ADR software using RPD. The results, however, were < 5X the PQL and should have been evaluated by the difference between the two measurements. The difference between the two measurements was < PQL and required no qualification. The qualifier was changed to "U". The reason code "nd" has been added to the EDD.</p>

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	<p>Sample TT-TP2-B3A-14 for chloride: Based on hierarchy of validation qualification, the "J" qualifier applied because of field duplicate imprecision, supersedes the positive bias associated with matrix spike recovery. The "fd,m" reason code was left off in error and has been added to the EDD.</p>
<p>4. <u>EDD</u>: As the original results table contained 7,677 records and the Rev 1 results table has only 7,633, the data set was completely checked again, resulting in one additional comment. Sample TT-TP4-M3-20160405-DUP for selenium was originally qualified as J with a validation_reason_code="fd,sp" and detect flags of "D". The record for Rev1 now has a qualifier of "U" with validation_reason_code="sp" and detect flags of "D". Please indicate the correct detect flags, final_validation_qualifier, and validation_reason_code for this record so all fields are consistent with each other.</p>	<p>Comment noted. The "U" qualifier is incorrect. The EDD has been updated to contain the following information for selenium in sample TT-TP4-M3-20160405-DUP:detect flag = "D"; final_validation_qualifier = "J"; and validation_reason_code = "sp".</p>