

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

**Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
35 East Wacker Drive - Suite 690
Chicago, Illinois 60601
Tel: (702) 960-4309**

January 17, 2019

Dr. Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

RE: Revised Data Validation Summary Report and Electronic Data Deliverable
2018 Annual Remedial Performance Report
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the Revised Data Validation Summary Report and Electronic Data Deliverable associated with the 2018 Annual Remedial Performance Report for Nevada Division of Environmental Protection (NDEP) review. This information is being submitted as requested in your letter dated November 26, 2018. As requested, NERT is also providing annotated responses to 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, P.G., CEM
Remediation Director
CEM Certification Number: 2399, exp. 3/24/19

Cc (via NERT Sharefile Distribution):

Jeff Kinder, NDEP, Deputy Administrator
Frederick Perdomo, NDEP, Deputy Administrator
James Dotchin, NDEP, Chief, Bureau of Industrial Site Cleanup
Carlton Parker, NDEP, Bureau of Industrial Site Cleanup
Alan Pineda, NDEP, Bureau of Industrial Site Cleanup
Christa Smaling, NDEP, Bureau of Industrial Site Cleanup
Alison Fong, U.S. Environmental Protection Agency, Region 9
Mark Duffy, U.S. Environmental Protection Agency, Region 9
Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually
Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually
Brian Loffman, Le Petomane, Inc.
Tanya C. O'Neill, Foley and Lardner, LLP
Allan DeLorme, Ramboll

Office of the Nevada Environmental Response Trust Trustee
January 17, 2019

John Pekala, Ramboll
Kim Kuwabara, Ramboll
Dan Pastor, Tetra Tech
David Bohmann, Tetra Tech

Cc (via NERT Stakeholder Sharefile Distribution):

Betty Kuo, Metropolitan Water District of Southern California
Brenda Pohlmann, City of Henderson
Carol Nagai, Metropolitan Water District of Southern California
Dave Johnson, LV Valley Water District
David Parker, Central Arizona Project
Eric Fordham, Geopentech
Jill Teraoka, Metropolitan Water District of Southern California
Kevin Fisher, LV Valley Water District
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Metropolitan Water District of Southern California
Mickey Chaudhuri, Metropolitan Water District of Southern California
Orestes Morfin, Central Arizona Project
Peggy Roefer, Colorado River Commission
Steven Anderson, LV Valley Water District
Todd Tietjen, Southern Nevada Water Authority

Cc (via NERT BMI Companies Sharefile Distribution):

Anna Springsteen, Neptune Inc.
Kirk Stowers, Broadbent Inc.
Kristen Lockhart, Neptune Inc.
Kurt Fehling, The Fehling Group
Patti Meeks, Neptune Inc.
Paul Black, Neptune Inc.
Paul S. Hackenberry, Hackenberry Associates
John Edgcomb, Edgcomb Law Group
Andrew Barnes, Geosyntec
Brian Waggle, Hargis + Associates
Chinny Esakkiperumal, Olin Corporation
Chuck Elmendorf, Stauffer
Curt Richards, Olin Corporation
Dave Share, Olin Corporation
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximus
Gary Carter, Endeavour LLC
George Crouse, Syngenta
Harry Van Den Berg, AECOM
Jeff Gibson, Endeavour LLC
Joanne Otani, Joanne M. Otani LLC
Joe Kelly, Montrose Chemical
Joe Leedy, Clean Water Team
Kelly McIntosh, GEI Consultants
Kevin Lombardozzi, Valhi
Kyle Gadley, Geosyntec
Lee C. Farris, Landwell
Mark Paris, Landwell
Michael Bogle, Womble Carlyle Sandridge & Rice, LLP
Michael Long, Hargis + Associates
Nick Pogoncheff, PES Environmental, Inc.
Ranajit Sahu, BRC

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January 17, 2019

Richard Pfarrer, TIMET
Rick Kellogg, BRC
Jack Luna, EMD
John Holmstrom, EMD
Mike Skromyda, EMD

NDEP Comment	Response to Comment
DVSR Comments	
<p>1. <u>Section 1.0, first paragraph</u>: The samples table contains 815 samples but the text states there are 814 samples. Please determine which is correct and edit the text or samples table, as necessary.</p>	<p>The text in Section 1.0 has been revised to state that 815 samples were collected.</p>
<p>2. <u>Section 1.0, analysis list</u>: The text lists methods 200.8, 7470A and 1664, but these analyses do not appear in the EDD. Please correct the method list or EDD as necessary.</p>	<p>In Section 1.0, the method references for 200.8, 7470A, and 1664 have been removed. Also, the method referenced for total recoverable phenolics has been updated to 420.4.</p>
<p>3. <u>Section 1.0, sensitivity, page 10</u>: The text states that the laboratory is required to report detects to the MDL and that the laboratory uses a formatter to report the results to the MDL; however, as per the text in the preceding sentences, these results are actually reported to the SQL. Please revise and replace MDL with SQL in these two sentences.</p>	<p>The text in Section 1.0 has been updated to:</p> <p style="padding-left: 40px;">The laboratory is required to report detected analytes down to the SQL for this project.</p>
<p>4. <u>Section 4.2.1, mercury holding time</u>: As mercury was not analyzed, it is not necessary to list the holding time in this section. As other edits are requested, please delete the reference to mercury in this section.</p>	<p>The text in Section 4.2.1 has been updated to remove the reference to mercury.</p>
EDD Comments	
<p>1. NDEP will update the DVSR and EDD guidance on the multiple results. It will have following language: The Multiple results can be reported for a single analyte for several reasons: dilutions to report analytes within the linear range of the calibration, results reported with QC sample outliers can be reanalyzed beyond the holding time and both results are reported, and analytes can be reported from two different methods (e.g., SW-846 8260 and 8270). In cases where more than one result is reported for an analyte in a sample, all results, including the validation qualifiers and reason codes (which may be "R" or "DNR"), are to be provided in the electronic data deliverable and will be uploaded into the BMI database. When these data are used for decision making, the end user should document the professional judgment used to choose the appropriate result. Please revise DVSR and EDD to follow this latest update.</p>	<p>The DVSR and EDD have been revised to be consistent with the updated NDEP DVSR and EDD guidance language stated in this comment. Valid results (i.e., results not rejected due to data validation) for constituents analyzed by multiple methods have been included in the DVSR and EDD without a "DNR" or "R" qualification.</p> <p>In the DVSR text, sentences specifying "DNR" qualified results have been removed. DVSR Table V, Overall Qualified Results, has been updated to remove records that had previously been listed with a validation qualifier "DNR,U".</p> <p>In the EDD, final_validation_reason_codes of "orr,nd" have been updated to "nd", and final_validation_qualifier values of "DNR,U" have been updated to "U".</p>

NDEP Comment	Response to Comment
2. A final_validation_reason_codes of "orr, nd" may be updated to a final_validation_qualifier of "U" and a final validation reason codes of "nd".	In the EDD, final_validation_reason_codes of "orr,nd" have been updated to "nd", and final_validation_qualifier values of "DNR,U" have been updated to "U".