

**OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE**

**Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee**  
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July 24, 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 for  
2018 AWF Capture Evaluation and 2018 ZVI Treatability Study  
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 (DVSR) and Electronic Data Deliverable (EDD) for data collected in 2018 for the Athens Well Field (AWF) Capture Evaluation and the Zero-Valent Iron (ZVI) Treatability Study for Nevada Division of Environmental Protection (NDEP) review. This information is being submitted as requested in your letter dated May 28, 2019. 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](mailto:steve.clough@nert-trust.com).

Office of the Nevada Environmental Response Trust



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Remediation Director  
CEM Certification Number: 2399, exp. 3/24/21

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NDEP Comment	Response to Comment
<b>General Comments</b>	
<p>NDEP noticed that many minor issues had been commented in the DVSR and EDD reports and some of them were repeated more than once. NDEP suggests that NERT avoid these minor issues in future deliverables.</p>	<p>A number of recent DVSR and EDD reports were submitted in succession, before NDEP comments on the first submittal could be incorporated into the subsequent submittals. NDEP comments will be incorporated in to future deliverables once received by NDEP.</p>
<b>DVSR Comments</b>	
<p>1. <u>Section 1.0, Precision and Accuracy of Environmental Data:</u> In the third paragraph, please also cite the NDEP validation guidelines as the basis for validation.</p>	<p>The reference for the NDEP validation guidelines (July 2018) has been added to the third paragraph in Section 1.0, Precision and Accuracy of Environmental Data.</p>
<p>2. <u>Section 3.4 and 5.4, completeness:</u> Please separate the completeness for the wet chemistry completeness by method.</p>	<p>The percent completeness has been listed separately for each wet chemistry method in Sections 3.4 and 5.4.</p>
<p>3. <u>Section 3.2.1, pH holding time:</u> In the EDD there are 45 pH results qualified "HF" by the laboratory that are not qualified as having an exceeded holding time. Please confirm these results should not be qualified.</p>	<p>Method 9045C for pH analysis states that samples should be analyzed as soon as possible. The analytical laboratory interprets this requirement as analyzing within 15 minutes of sampling. For the purposes of data validation of soil samples, a 28 day holding time from the time of collection is used. This hold time is based on professional judgment of the data validators to be consistent with the typical holding times of other inorganic analyses.</p> <p>The laboratory flagged all 45 pH results "HF" (field parameter with a holding time of 15 minutes) to document the analysis was performed at the laboratory, more than 15 minutes after sampling. All samples were analyzed within the 28 day data validation holding time.</p>
<b>EDD Comments</b>	
<p>1. This EDD has the same filename and dvsr_id as the EDD for NERT Semi-annual 2H2018. Both have file names of "NERT 1903 EDD Rev 0. accdb" and dvsr_id="NERT 1903". Each EDD should have a unique file name and dvsr_id because these are used to distinguish data in the database. For now, the EDD has been renamed to "NERT 1903 EDD AWF Rev 0.accdb" with a dvsr_id of "NERT 1903 AWF". If you would like a different unique name, please provide the filename and dvsr_id you would prefer to use.</p>	<p>The EDD filename and the dvsr_id have been revised to "NERT 1905".</p>

<b>NDEP Comment</b>			<b>Response to Comment</b>									
2. Note the standardized name for the following parameters: <table border="1" data-bbox="247 285 989 428"> <thead> <tr> <th><b>Current EDD parameter</b></th> <th><b>Standardized parameter</b></th> <th><b>Standardized parameter_id</b></th> </tr> </thead> <tbody> <tr> <td>Iron, Ferrous</td> <td>Ferrous Iron</td> <td>7439-89-6 [2+]</td> </tr> <tr> <td>Iron, Ferric</td> <td>Ferric Iron</td> <td>7439-89-6 [3+]</td> </tr> </tbody> </table>			<b>Current EDD parameter</b>	<b>Standardized parameter</b>	<b>Standardized parameter_id</b>	Iron, Ferrous	Ferrous Iron	7439-89-6 [2+]	Iron, Ferric	Ferric Iron	7439-89-6 [3+]	In the EDD, parameter and parameter_id have been revised for Ferrous Iron and Ferric Iron results. Both fields now have the standardized values. Future EDDs will use these values.
<b>Current EDD parameter</b>	<b>Standardized parameter</b>	<b>Standardized parameter_id</b>										
Iron, Ferrous	Ferrous Iron	7439-89-6 [2+]										
Iron, Ferric	Ferric Iron	7439-89-6 [3+]										
3. There are records in the results table where the associated matrix is SO (soil) and the result_units are mg/L or ug/L. As this creates a matrix/units mismatch in the database, please change the analytical method to include "soluble," as this would provide sufficient information to verify the units are correct.			The analytical methods for these records have had "-soluble" appended to them in the EDD.									
4. The filtered_flag field should be populated with "TOTAL" or "DISSOLVED" per the revised EDD Guidance. This field will be updated during file upload if a revised EDD is not required for other reasons.			In the EDD, the filtered_flag column has been updated to use the values "TOTAL" and "DISSOLVED". Future EDDs will use these values.									