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

March 12, 2020

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 Pages for Quality Assurance Project Plan, Revision 4

Nevada Environmental Response Trust

Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present corrected page of the Quality Assurance Project Plan, Revision 4 for Nevada Division of Environmental Protection (NDEP) review. These pages are submitted as requested in your February 20, 2020 letter. I have also included an annotated response to comments to facilitate your review of the subject material.

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

Stephen R. Clough

Remediation Director

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

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

John Pekala, Ramboll

Office of the Nevada Environmental Response Trust Trustee March 12, 2020

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
Mauricio Santos, 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

Cc (via NERT BMI Companies Sharefile Distribution):

Todd Tietjen, Southern Nevada Water Authority

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

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

Richard Pfarrer, TIMET

Office of the Nevada Environmental Response Trust Trustee March 12, 2020

Rick Kellogg, BRC John Holmstrom, EMD

	NDEP Comment	Response to Comment
Deliverable Comments		
1.	Section 1.4.4, p. 5: This section states, "The primary subcontracted laboratory for asbestos analysis for this project is EMSL, which is a NELAC certified laboratory. Analysis for asbestos will take place at EMSL's laboratory in Cinnaminson, New Jersey." However, NDEP notes that this lab is Nevada certified for the analysis of asbestos in soil (elutriator method). In addition, this section would benefit from a reference to Table 1.	The text for Laboratory Project Manager at EMSL Analytical, Inc. (EMSL) has been modified to state, "The primary subcontracted laboratory for asbestos analysis for this project is EMSL. EMSL is certified by the State of Nevada for the analysis of asbestos in soil (elutriator method)." In addition, the text in Section 1.4.4 on p. 5 has been updated to include the following reference to Table 1: "Table 1 lists the analytical laboratories and the current certification status for the methods that are addressed as part of this QAPP."
2.	$\underline{\text{Table 1}}$ would benefit from the addition of a column which provides the NV-certified status such as "yes", "NELAC", or "not applicable".	Table 1 has been updated to include the current certification status for the methods and laboratories listed.
3.	Appendix A QAPP Project Organization / Roles and Responsibilities: This list does is not in agreement with Sections 1.4.4 and 1.4.5	Appendix A. QAPP Project Organization / Roles and Responsibilities has been updated to include all of the subcontract laboratories listed in Sections 1.4.4 of the text and is now consistent with Sections 1.4.4 and 1.4.5 of the text.

1/1 Ramboll