

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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January 13, 2021

Dr. Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Road, Suite 200
Las Vegas, Nevada 89119

RE: Revised Remedial Investigation Data Validation Summary Report and Electronic Data Deliverable
Phase 3 RI Modifications No. 4, 5, 6, and 9 (February 2019 to January 2020)
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the revised Remedial Investigation (RI) Data Validation Summary Report and Electronic Data Deliverable (DVSR/EDD) associated with data collected as part of Phase 3 RI Modifications No. 4, 5, 6, and 9 for Nevada Division of Environmental Protection (NDEP) review. The samples covered by this DVSR and EDD were collected as part of the ongoing Phase 3 RI between February 2019 and January 2020. This revised submittal has been prepared in response to NDEP's comments dated December 2, 2020. As requested, an annotated response to comments is also attached to this letter.

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. 3/24/21

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January 13, 2021

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| NDEP Comment | Response to Comment |
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| DVSR Comments | |
| <p>1. The comment of the RTCs¹ does not adequately address the problem of analyte detection below the PQL while the blank contamination detected is above the PQL. The detection in the sample could merely be from blank contamination. Please review this statement. Consider UFP-QAPP or NDEP guidance on qualifying data due to blank contamination, https://ndep.nv.gov/uploads/documents/qualifying-data-guide.pdf.</p> | <p>Consistent with the referenced NDEP guidance and as previously discussed between the Trust and NDEP, the DVSR and EDD have been revised to include reason codes to distinguish the value of the blank result relative to the PQL. The reason codes are:</p> <p>ba – blank contamination above PQL bb – blank contamination below PQL</p> <p>The two reason codes have been added to the list of reason codes in Table IV in the DVSR. The reason codes have been added to the results qualified for blank contamination in Table V of the DVSR and the EDD. This provides the end data user with additional information regarding the amount of contaminant in the blank sample, without censoring the data (i.e., sample results that are below the PQL and associated with blank contamination remain qualified J as estimated).</p> <p>In Sections 2.2.2 and 6.2.2 of the DVSR, the text for results below the PQL and the text for results above the PQL have been revised to include the statement: Reason codes are applied to distinguish if the blank concentration was above or below the PQL.</p> |

¹A previous set of comments was received by the Trust via email on October 23, 2020 and a response was provided to NDEP on November 9, 2020. These prior comments and responses are provided on the following page. This comment is a follow-up to the previous DVSR Comment No. 3.

| NDEP Comment | Response to Comment |
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| DVSR Comments | |
| <p>1. <u>Section 1.0, laboratories</u>: ATL is also listed as a laboratory in the EDD. Was this laboratory subcontracted by Eurofins/TestAmerica?</p> | <p>ATL is Eurofins Air Toxics, LLC (Air Toxics). Eurofins Test America subcontracted soil vapor analyses to Air Toxics.</p> |
| <p>2. <u>Section 4.1.3, LCS/LCSD qualifications</u>: The text notes that positive bias was removed from three results (6, considering both sets of reported units), as the results were also qualified for field duplicate RPD outliers. Only 2 results (4, considering both sets of units), are present in the EDD. Please correct this discrepancy.</p> | <p>The DVSR text correctly states that positive bias was removed from three results (6 in both units) due to field duplicate RPD outliers or ICAL %RSD outliers. Two Acetone results (4 in both units) from field duplicate pair samples RISG-65-15.0-20191212 and RISG-65-15.0-20191212-FD are qualified due to field duplicate RPD outliers and have a reason code of "l,fd" in the EDD. One 2-Hexanone result (2 in both units) from sample RISG-61-10.0-20191231 is qualified due to an ICAL %RSD outlier and has a reason code of "c,l,sp" in the EDD. The DVSR and EDD are therefore consistent.</p> |
| <p>3. <u>Section 6.2.2, blank qualification actions</u>: The actions described in this section do not address how data are qualified in the event the sample result is below the PQL and the blank result is above the PQL. An action should be added for this combination.</p> | <p>The text in Section 6.2.2, blank qualifications has been revised, and now states:</p> <p><u>Results Below the PQL</u> - If a sample result was less than the PQL, the sample result was qualified as estimated (J) at the reported concentration.</p> |
| EDD Comments | |
| <p>1. No comments for EDD "NERT 2004 EDD Rev 0.mdb".</p> | |