



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Kenny C. Guinn, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

October 10, 2006

Mr. Mark Paris
Basic Remediation Company (BRC)
875 West Warm Springs
Henderson, NV 89015

Re.: Nevada Division of Environmental Protection Response to:
Data Validation Summary Reports – Datasets # 1b, 6a, 6b, 6c, 6d, and 8a dated September 14, 2006, July 5, 2006, July 14, 2006 (datasets # 6b, 6c, and 6d), and October 3, 2006, respectively
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's correspondence identified above and provides the following comments:

Dataset #1b

This data validation summary report (DVSR) is acceptable to the NDEP.

Dataset #6a

1. Organochlorine Pesticide Results. There appears to be a discrepancy between the laboratory reports and the database for all samples where the results for compounds 4,4' DDT and 4,4' DDE are reversed. For example, the laboratory report for sample PUE-07-N-S indicates the concentration of 4,4' DDT and 4,4' DDE are as follows:

4,4' DDT: 33 µg/kg
4,4' DDE: 220 µg/kg

However, the results in the database are reversed for these two compounds. An incomplete review of the other samples from this report indicates this reversal of compounds/concentrations appears to be systematic throughout the database. Please check the entire project database and advise the NDEP of the findings.

Please revise and resubmit this report.



Dataset #6b

1. Hexavalent Chromium. The case narrative included with file 6b L9811175, dated 12/15/1998 states, "The hexavalent chromium results should be considered estimates as both the soluble and insoluble matrix spikes failed the minimum acceptance criteria." The report should clarify why this data was not qualified. This rationale is necessary to meet the statement on page 2 of the DVSR: "When professional judgment is used in qualification or non-qualification of data, the rationale will be described in the appropriate section."

Section 2.2.5 (Comparability) does not include the hexavalent chromium methods for this event (November 1998) and the 2006 program. Also, the heading on the second column on page 11 is incorrect (April 2000).

Table 4 should also include the appropriate holding times for the hexavalent chromium extraction and analysis methods (3060A, 7196). The acceptable criteria are 30 days between sampling and extraction and 4 days between extraction and analysis.

Please revise and resubmit this report.

Dataset #6c

This DVSR is acceptable to the NDEP.

Dataset #6d

This DVSR is acceptable to the NDEP.

Dataset #8a

This DVSR is acceptable to the NDEP.

Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850x247.

Sincerely,



Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions

BAR:s

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