



# STATE OF NEVADA

Department of Conservation & Natural Resources

Jim Gibbons, Governor

Allen Biaggi, Director

DIVISION OF ENVIRONMENTAL PROTECTION

Leo M. Drozdoff, P.E., Administrator

February 5, 2007

Mr. Mark Paris  
Basic Remediation Company (BRC)  
875 West Warm Springs  
Henderson, NV 89011

Re.: Nevada Division of Environmental Protection Response to:  
*Data Validation Summary Report – Common Areas Sampling Event #20c*  
dated December 21, 2006  
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's correspondence identified above and provides comments in Attachment A.

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

cc: Jim Najima, NDEP, BCA, Carson City  
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,  
Washington, D.C. 20036  
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009  
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,  
75 Hawthorne Street, San Francisco, CA 94105-3901  
Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-  
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Girard Page, Clark County Fire Department, 575 East Flamingo Road, Las Vegas, Nevada 89119  
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801  
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011  
Sherry Bursey, Davis, Graham & Stubbs, LLP, 1550 17<sup>th</sup> Street, Suite 500, Denver, CO 80202  
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015  
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409  
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Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009  
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Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004

### Attachment A

1. **Rejected Samples.** The text in Section 2.1.5 (Spike Samples) of the DVSR states, "Three nondetected antimony sample results (PRNSNP-28C-0-1, PRNSNP-29C-0-1, and PRNSNP-30C-0-1) required rejection (R) due to severely low MS/MSD recoveries (less than 30 percent)". If possible, it would be best to have a standard percentile that defines a "severely low recovery." In some data validation summary reports 20 % – 30 % recovery is a "low recovery" and non-detected results would be qualified "UJ" rather than rejected. It is requested that BRC be consistent in the application of filtering rules.
2. **Editorial.** There are some typographical errors in the report. For example, Section 2.1.8 (Calibrations) BRC states "In the metals analysis, metals were detected six continuing calibration blanks" needs an "in" in between "detected" and "six."
3. **Repeated Results.** F1F070173, PREU-05-GW results for metals (antimony through titanium) are repeated twice in Table 9 of the DVSR (p. 92-93/160 and p.104-105/160). Replicate results in a table makes an already long table even longer and more difficult to read. Please review the table to make sure there are no other redundancies.
4. **Incorrect value in Table 9.** In the DVSR, Table 9, the result value for antimony is given incorrectly on p.105/160 as 0.838, instead of 0.0838, as is correctly reported on p.92/160. These metals values for PREU-05-GW do not match the values in the database; they differ by three orders of magnitude. Apparently, the units are different in the lab report and the database. Since the table does not have units, it is confusing as to what the units are for those results. Please consider including units in the table with the results, especially when the units differ in the lab report and the database.
5. **Surrogate spikes.** It is difficult to follow the discussion in Section 2.1.7 on Surrogate Spike and resulting qualifiers with Table 11. It is not clear which surrogate spike results in Table 11 correspond to which bullet and the associated rationale for each qualifier. This is likely due to the large number of qualified data and in some cases multiple qualifiers. It is especially unclear as to why some data are qualified as rejected and others are qualified as "UJ" or "NA" yet had 0% recovery, presumable this is due to dilutions but there is no way to follow the text. This section would be significantly improved if the text included the lab packages or sample IDs in each bullet explanation.
6. **U Qualification of Samples due to Blank Contamination.** While the data validation was completed in accordance with USEPA guidance and appropriate professional judgment, it was noted that a number of metals, VOCs and radionuclide samples have been qualified as "U" due to blank contamination. The VOC analytes are known to be laboratory contaminants and several of the metals and radionuclides were found at low levels. However, the qualification of several elements is of concern since the censoring level approaches both natural background levels and/or action levels (e.g. thallium, lead-210, zinc and others). Because these data were obtained in 2001 there is no corrective impact than can be taken. However, please discuss this issue with the current laboratories and work to minimize qualifying data due to blank contamination.