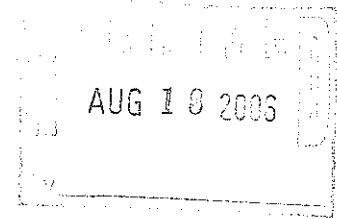


STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Kenny C. Guinn, Governor
Allen Biaggi, Director
Leo M. Drozdoff, P.E., Administrator



August 16, 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 Report (DVSR) – Dataset 28
dated July 3, 2006
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's correspondence identified above and provides comments below. This does not necessitate resubmittal, however, BRC must address these issues as part of the remainder of the DVSRs. A number of reports have already been submitted to the NDEP. BRC should consider retracting these reports and revising them, if necessary.

In future reports the basis for qualifying data based on LCS/LCSD recovery should be more specific and should be consistent. The qualifiers are clear in Appendix A (response to comment #4), but it would be helpful to include these in the main report.

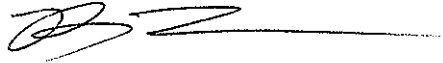
There appears to be a difference between how the MWH validator and ERM validators chose to reject those samples that had LCS values below the lower control limit and were also non-detects. ERM is only qualifying them if both the LCS and MS are out of compliance. In some cases there was no LCS data (older reports) so they are rarely rejected. In this report, the MWH validator rejected those samples where the associated LCS value was below the lower acceptance limit. It is the responsibility of BRC to insure consistency between its contractors.

Section 2.1.9, please be sure to discuss the PCB issues outlined in this section as part of the CAMU-area CSM. Please reference this comment letter and the BRC report as part of that discussion.

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-
1741
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89015
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
Susan Crowley, Tronox, PO Box 55, Henderson, Nevada 89009
Keith Bailey, Tronox, Inc, PO Box 268859, Oklahoma City, Oklahoma 73126-8859
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
Lee Erickson, Stauffer Management Company, 400 Ridge Rd, Golden, CO 80403
Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
Bainbridge Island, WA 98110
Jon Erskine, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA
94612
Karleen O'Connor, Cox Castle Nicholson, 555 Montgomery Street, Suite 1500, San Francisco, CA 94111
Brian Walsh, Centex Homes, 3606 North Rancho Drive, Suite 102, Las Vegas, NV 89130
Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004
Vincent Aiello, Beazer Homes, 4670 South Fort Apache, Suite 200, Las Vegas, NV
Dave Gratson, Neptune and Company, 1505 15th Street, Suite B, Los Alamos, NM 87544