

Document and Response to Comments Tracking Form
NV Energy – Reid Gardner Station
Administrative Order On Consent Implementation

Document Title Letter Report: Ponds D and G Solids Sampling Results and Proposed Soil Sampling Analytical Parameters

Preparer NV Energy

Draft #1

To NDEP

From NV Energy

Submittal Date 3/4/2010

Comment Date 4/7/2010

Response Date 4/21/2010

Commenter Shannon Harbour, P.E

Responder _____

Comment #1

1. General comment, being that the depth to groundwater in the vicinity of Ponds D and G has been measured as low as 8.5 feet below ground surface (fbgs), NVE should also compare the collected solids sampling data to the Leaching Basic Comparison Levels (LBCLs) using a dilution attenuation factor (DAF) of one (1). Therefore based on this comparison, NDEP is requesting the following errata:

a. Page 4 of 4, the list of analytes for confirmation sampling should additionally include:

- i. Aluminum*
- ii. Barium*
- iii. Boron*
- iv. Total chromium*
- v. Iron*
- vi. Magnesium*
- vii. Manganese*
- viii. Mercury (Pond G only)*
- ix. Molybdenum*
- x. Nickel*
- xi. Selenium*

b. Tables, revised comparison tables (Tables 1-1, 1-2, 2-1 and 2-2) that include the leaching comparisons.

Response #1

- a. These parameters have been added to the list of analytes for confirmation sampling.
- b. These tables have been revised to include the leaching comparisons for detected parameters.

Comment #2

Pages 1 and 2 of 4, Pond Solids Sampling Activities, NDEP noted that samples were collected by drilling and split-spoon sampling (Pond D) or using a backhoe and collecting grab samples (Pond G). NVE should provide additional information describing how the discrete and/or grab samples were selected for analysis from the continuous profile at Pond D and over the eight foot depth interval at Pond G. Additionally, NVE should provide details of how samples were selected and composited for the remaining SRC analytical testing at both ponds.

Response #2

Additional information describing sampling activities has been added to the revised letter report in Attachment A.

Comment #3

Page 4 of 4, Proposed Soil Sampling Activities, NDEP has noted that formaldehyde was detected in one of four discrete samples collected at Pond G with a concentration that exceeded screening level criteria. At Pond D, six of the nine discrete samples had detectable levels of formaldehyde but none exceeding screening level criteria. However, NDEP notes that these results suggest that formaldehyde is not uniformly distributed in the pond sediments and, as shown in Pond G, formaldehyde cannot be assumed not to occur at concentrations above the screening level criteria anywhere within Pond D. Therefore, NVE should include formaldehyde in the analyses of the native soils beneath Pond D as well as Pond G.

Response #3

The letter report has been revised to include formaldehyde as a soil sampling analyte in Pond D.

Final

To _____

From _____

Submittal Date _____

Approval Date _____

Approver _____