



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

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
Colleen Cripps, Ph.D., Administrator

September 27, 2013

Michael Rojo
Environmental Services, Supervisor
NV Energy
PO Box 279, MS 77
501 Wally Kay Drive
Moapa, NV 89025

Re: **NV Energy (NVE)**
Reid Gardner Station (RGS)
NDEP Facility ID #H-000530
Nevada Division of Environmental Protection (NDEP) Comments on:
Draft Pond F Solids Removal Completion Report, Dated: June 2013

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's *Draft Pond F Solids Removal Completion Report*, received by NDEP on June 24, 2013. The subject report documents the removal of pond solids from former Pond F and sampling of material below the pond liner. Please review and address the comments from NDEP included in Attachment A.

Please contact the undersigned with any questions or comments about this letter at (775) 687-9396 or aoakley@ndep.nv.gov

Sincerely,

Alison Oakley, CEM
Environmental Scientist III
Bureau of Corrective Actions
NDEP-Carson City Office
Fax: 775-687-8335



ec: Greg Lovato, Bureau of Corrective Actions, NDEP
Scott Smale, Bureau of Corrective Actions, NDEP
Todd Croft, Bureau of Corrective Actions, NDEP Las Vegas
Bill Campbell, Tribal Liaison, NDEP
Alan Tiney, Bureau of Water Pollution Control, NDEP
Ebrahim Juma, Clean Water Team
Joe Leedy, Clean Water Team
Dennis Campbell, Southern Nevada Health District (campbell@snhdmail.org)
Lynn M. Cintron, Sr. Administrative Assistant, Solid Waste & Compliance, SNHD,
(cintron@snhdmail.org)
Brian Northam, Envi. Health, Solid Waste & Compliance, SNHD (northam@snhdmail.org)
Starla Lacy, NV Energy (SLacy@nvenergy.com)
Darren Patten, NV Energy (DPatten@nvenergy.com)
Tony Garcia, NV Energy (TGarcia@nvenergy.com)
Michael Rojo, NV Energy (MRojo@nvenergy.com)
Jason Reed, NV Energy (JReed@nvenergy.com)
Becky Svatos, Stanley Consultants, Inc., (SvatosBecky@stanleygroup.com)
William Carrig, Stanley Consultants, Inc., (CarrigBill@stanleygroup.com)
John Kivett, Arcadis, (John.Kivett@arcadis-us.com)
Brad Cross, Arcadis, (Brad.Cross@arcadis-us.com)

cc: William Anderson, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025
Ian Zabarte, Moapa Band of Paiutes, Environmental Director, P.O. Box 340, Moapa, NV 89025
Noelle Gentilli, Department of Water Resources, 1416 9th Street, Room 1118, Sacramento CA 95814

Appendix A

1. Section 1.2, Page 1-3, Paragraph below Bullets: The e-mail documenting approval of the sampling event and analyte list is not included in Appendix B as described. (Also cited in Section 3.1, page 3-1.)
2. Section 2, Page 2-1, First Paragraph: Please revise the last sentence to “The NDEP’s representative, ACRADIS U.S., Inc.,...” NDEP personnel were not at the site during the pond solids removal.
3. Section 2.1, Page 2-2, Top of Page: Please explain whether the dam decommissioning application was approved and the dam formally closed. If the dam was formally closed, please include that information in the report.
4. Section 2.2, Page 2-2, Second Paragraph, Second Sentence: Please revise the second sentence to “ACRADIS U.S., Inc. personnel, representing NDEP, were on-site on December 13, 2013 to observe solids removal activities.” Please note Arcadis was only an observer on behalf of NDEP.
5. Section 2.4, Page 2-3, Second Sentence: Please revise the second sentence to “ACRADIS U.S., Inc. personnel, representing NDEP, were on-site on December 13, 2013 to observe solids removal activities.” Please note Arcadis was only an observer on behalf of NDEP.
6. Section 3.3, Page 3-2, Fifth Sentence: There is confusion whether the soil discussed is the gray-black or the black soil. Please review and clarify.
7. Section 3.3, Page 3-2, General Comment: Below the Pond F liner (installed in 2007 per Section 1.2), soil was imported and placed in the bottom of Pond F. This imported soil was clearly evident under the liner across Pond F. The imported soils are generally tan to gray to light brown and reddish-brown. As stated in Section 3.3, in one location, the [soil] underlying the imported soil was “black”. The text indicates that this material is different from the pond solids. While some differences may be observable between the two, the “black” material is likely impacted and may contain pond solids from historical, unlined, Pond F operations.
8. Section 5, Page 5-1: This section does not contain any recommendations.