

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

March 17, 2014

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

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:
Solids Removal Work Plan for Former Ponds 4A, 4C-1, and 4C-2, Administrative Order on Consent Activities, NV Energy, Reid Gardner Station, Draft January 2014

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's submittal of three reports titled *Solids Removal Work Plan for Former Pond 4A, Solids Removal Work Plan for Former Pond 4C-1, and Solids Removal Work Plan for Former Pond 4C-2*. The reports were submitted on January 21, 2014 and received by the NDEP on January 22, 2014. The NDEP has the following comments, divided into comments for Pond 4A and combined comments for Ponds 4C-1 and 4C-2:

General Comment 1: During informal discussions between NDEP and NVE, pre-removal sampling above and below the liner of ponds 4C-1 and 4C-2 was mentioned. There is no discussion in the work plan of pre-removal sampling. If this is something that NVE would like to pursue, steps for this sampling should be included in the work plan.

General Comment 2: NVE should consider revising the sections (Profile Figures) to include the groundwater monitoring wells, their corresponding recent groundwater elevations, and the projected groundwater table.

Comments to Report for Pond 4A solids removal

4A 1. Pages 2-1 through 2-3, Background: The background section includes several generalized statements that have not been demonstrated or are inconsistent with existing data. For example, it is stated that the clay cores, clay blanket, and underlying natural clay unit "appear to have limited contaminant migration" even though a groundwater recovery trench was later installed to contain contaminant migration. Also it is stated that materials encountered during the 2008 investigation were "generally fat clays" overlain by pond solids. The boring logs from that investigation describe those soils as lean clay and previous investigations in the same area describe encountering lean clays and sandy clays. Such generalized statements should be avoided if not well documented.



4A 2. Page 3-2, Section 3, Second paragraph: The text states: *At each sample location, soil will be sampled from approximately two feet bgs to approximately 12 feet bgs.* The sampling intervals should be provided.

Comments to Report for Pond 4C-1 and Pond 4C-2 solids removal

4C 1. Pages 2-1 through 2-3, Background: The background sections for both 4C-1 and 4C-2 include a generalized statement that the clay cores, clay blanket, and the underlying natural clay unit “appear to have limited contaminant migration”. The extent of groundwater impacts have not been fully established and such general statements should be avoided.

4C 2. Page 3-1, Section 3 Second Paragraph:

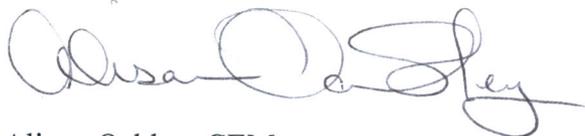
- a. The text states: *care will be taken to minimize the removal of the underlying clay layer.* Chances are that the underlying clay layer has been impacted by secondary source material and NVE would benefit from removal of some or all of the clay layer. Additionally, because the ponds are being closed and, based on the intent of the Work Plan, the primary source will be removed, there is no longer a reason to maintain the clay layer. Removal should include ash and underlying soils above the water table that appear impacted, including clay soils.
- b. Why are the berms around or between the decommissioned ponds being retained when the ponds will not be used again? The Pond 4 area has been reconfigured so many times in the past that there may be secondary contamination under the area that now contain berms; therefore, NVE should consider removing some or all of the berm material.

4C 3. Page 3-2, Section 3, First paragraph: The text states: *At each sample location, solid samples will be collected from approximately the bottom of the HDPE liner system to approximately two feet below the HDPE liner system or until the first indication of native soil.* The sampling interval should be provided.

NVE has requested expedited approval to abandon six monitoring wells that lie within the footprint of Pond 4A. These wells are called CMW-3S, 3D, 5S, 5D, 6S, and 6D. The NDEP **concurs** with the request to abandon the six listed wells in accordance with applicable Nevada regulation prior to solids removal from Pond 4A.

Please contact me 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

Mr. Mike Rojo
March 17, 2014
Page 3 of 3

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