



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

December 8, 2014

Michael Rojo
Environmental Services, Supervisor
NV Energy
6226 W Sahara Ave M/S 30
Las Vegas, NV 89146

Re: **NV Energy (NVE)**
Reid Gardner Station (RGS)
NDEP Facility ID #H-000530
Nevada Division of Environmental Protection (NDEP) Comments and Concurrence:
Solids Removal Work Plan, Pond E-2, Administrative Order on Consent Activities,
NV Energy, Reid Gardner Station, Draft September 2014

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's submittal of the DRAFT work plan titled *Solids Removal Work Plan for Former Pond E-2*. The work plan was received by the NDEP on October 1, 2014. The NDEP has the following comments to the work plan:

1. The background section states that Pond E was in service from 1974 to 2001, and in 2002 approximately 320,000 cubic yards of pond solids were removed before adding a geogrid and backfill soil in preparation for construction of the new ponds E-1 and E-2. Provide information on any pond solids from pre-2001 that may have been left in place prior to installing the geogrid and clean fill.
2. The work plan states that the five discrete soil samples collected after solids removal will be analyzed for general chemistry, metals, and formaldehyde. The document referenced is the 2013 Preliminary Source Area Identification and Characterization Report (PSAICR). The PSAICR does not provide a list of chemicals included in the general chemistry or metals category. Please provide a table that lists specific chemicals that are included in the categories general chemistry and metals or refer to the document that contains the lists (ex.: September 2008 Preliminary Site Related Chemical Document).
3. Provide depth intervals for soil samples to be collected beneath the geogrid. Based on the response to #1 above, it may be prudent to collect samples at multiple depths.
4. The NDEP requests total organic carbon, and sulfur speciation (e.g., hydrogen sulfide, sulfite, sulfate, etc.) be included in the general chemistry analytical list. Other parameters may be requested once NDEP has an opportunity to review the complete parameter list requested in comment #2.



Mr. Mike Rojo
December 8, 2014
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Please contact me with any questions or comments about this letter at (775) 687-9396 or
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Sincerely,



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Environmental Scientist III
Bureau of Corrective Actions
NDEP-Carson City Office

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