



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
David Emme, Administrator

October 19, 2015

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) Review of:
Former Pond 4C-2 Data Validation Report, Draft August 2015

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's submittal of the Draft report titled *Former Pond 4C-2 Data Validation Report* (Report). The Report was received by the NDEP on September 9, 2015. The Report contains laboratory data and data validation reports associated with sampling during solids removal as part of pond decommissioning of Pond 4C-2. A review of the data validation reports produced by the third party data validation company was completed by Amy Goldberg Day with ARCADIS. Ms. Day's review is included in Attachment A. Ms. Day found no discrepancies or problems related to the data validation effort.

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

Attachments (1)
Attachment A – Data Validation Report Review Letter

- ec: Jeff Collins, Nevada Division of Environmental Protection (NDEP)
Scott Smale, Bureau of Corrective Actions, NDEP Carson City
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 (ejuma@cleanwaterteam.com)
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Lynn M. Cintron, Southern Nevada Health District, (cintron@snhdmail.org)
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John Kivett, ARCADIS U.S., Inc., (John.Kivett@arcadis-us.com)
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Andrea Issod, Sierra Club, (andrea.issod@sierraclub.org)
Robert Wiygul, Counsel Sierra Club and Moapa Band of Paiutes, (Robert@waltzerlaw.com)
Ranjit Sahu, Consultant, (sahuron@earthlink.com)
- cc: Alteha Tom, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025
Darren Daboda, Moapa Band of Paiutes, Environmental Director, P.O. Box 340, Moapa, NV 89025
Clark County Emergency Management, 500 S. Grand Central Parkway 6th Floor, P.O. Box 551713, Las Vegas, NV 89155-1713
Anitha Rednam, Department of Water Resources, 1416 9th Street, Room 1140, Sacramento CA 95814

Attachment A

Letter Review of Data Validation Reports for Pond 4C-2 Solids Sampling



ARCADIS U.S., Inc.
100 Smith Ranch Road, Suite 329
San Rafael,
California 94903
Tel 415 491-4530 x 19
www.arcadis-us.com

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Bureau of Corrective Actions
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

Environment

Subject:

**Review of Data Validation Reports
NV Energy
Reid Gardner Station
NDEP Facility ID # H-00530**

Review of Data Validation Reports for Pond 4C-2 Soil and Solid samples

Date:

October 16, 2015

Contact:

Amy Goldberg Day

Phone:

415.491.4530 x19

Email:

Amy.GoldbergDay@Arcadis.com

Dear Ms. Oakley:

ARCADIS reviewed the data validation reports prepared by Ordway on behalf of Stanley Consultant for the Nevada Department of Energy RGS Site. Data validation reports were reviewed for the soil and solid data generated from the Pond 4C-2 sampling events conducted December 10, 2014, January 6, 2015, January 21, 2015, March 17, 2015, and April 6, 2015. The reports are dated May 16 or 17, 2015 with each validating one or two samples.

ARCADIS reviewed the technical approach and professional judgment applied in performing the data validation. ACRADIS then evaluated the results based on the analytical chemistry data package provided by the laboratory.

The validator used the US EPA data validation guidance and analytical chemistry guidance documents as the foundation for the review. Data were evaluated for US EPA Level IV. Soil samples were analyzed for anions, hexavalent chromium, metals, PAHs, wet chemistry parameters, total dissolved solids, total phosphorous, and silica. A data validation report was prepared for each method per sampling day.

The reports were very detailed and the data validation strictly followed the guidance in the US EPA document SW-846 without exception. SW-846 is the technical document presenting the analytical methodology and data quality controls for each method.

Imagine the result

Very few of the analytical results from each method were qualified. Based on ARCADIS' review, Ordway appears to adhere to the SW-846 methodology. Unlike previous reports, Ordway appeared to allow for professional judgment to be used in evaluating the analytical methodology and slight deviations from SW-846 that did not affected the analytical results were not used to qualify data.

If you have any questions regarding the data validation review, please feel free to contact me.

Sincerely,



Amy Goldberg Day
Principal Toxicologist

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EC: John Kivett, ARCADIS