



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

February 3, 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) Concurrence with Change to:  
Quarterly Progress Report Requirements

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's January 30, 2015 letter titled *Quarterly Progress Report Requirements*. Quarterly progress reports, a requirement of the Administrative Order on Consent (AOC), were historically submitted as part of the quarterly Groundwater Monitoring and Remediation Report (GMR). The NDEP currently requires semiannual monitoring and annual reporting, so the GMR is no longer submitted quarterly. The quarterly progress reports are provided to NDEP in an e-mail format; however, NVE, at the request of NDEP, also submits monthly progress reports, making the information provided in the quarterly progress report redundant.

To simplify reporting requirements, the NDEP concurs with eliminating the AOC required quarterly progress report and replacing it with the monthly progress report. The monthly progress report will contain the information described in the attached letter, which meets reporting requirement of Section XII.1 of the AOC. Please contact me with any questions or comments about this letter at (775) 687-9396 or [aoakley@ndep.nv.gov](mailto:aoakley@ndep.nv.gov)

Sincerely,

Alison Oakley, CEM  
Environmental Scientist III  
Bureau of Corrective Actions  
NDEP-Carson City Office

Attachments: One (1) Letter, *Quarterly Progress Report Requirements*



Mr. Mike Rojo  
February 3, 2015  
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cc: 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](mailto:ejuma@cleanwaterteam.com))  
Joe Leedy, Clean Water Team ([jleedy@cleanwaterteam.com](mailto:jleedy@cleanwaterteam.com))  
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cc: Althea 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 9<sup>th</sup> Street, Room 1140, Sacramento CA 95814



January 30, 2015

Nevada Division of Environmental Protection  
NDEP - Bureau of Corrective Actions  
901 S Stewart St  
Carson City, NV 89701  
Attn: Alison Oakley

Subject: NV Energy Reid Gardner Station  
Quarterly Progress Report Requirements

Dear Alison,

Section XII.1 of the Administrative Order on Consent (AOC) signed by NV Energy and the Nevada Division of Environmental Protection (NDEP) on February 22, 2008 states *“Beginning with the first full calendar quarter following the Effective Date, and throughout the Effective Period of this AOC, and in addition to any other requirement of this AOC, NPC shall submit to the Division a written quarterly progress report.”* These quarterly progress reports have historically been included as part of the quarterly Groundwater Monitoring and Remediation Reports (GMRs); however, as the frequency of the GMRs was reduced to semi-annual, then annual submission, the quarterly progress reports have been provided in an e-mail format. Recently, at the request of the NDEP, NV Energy has also been providing monthly AOC progress updates as well.

During a meeting on December 11, 2014, NDEP and NV Energy discussed that since progress reports and schedule updates are provided to the NDEP monthly and meetings are generally held between NV Energy and NDEP representatives quarterly, the quarterly progress reports are duplicative of these efforts. If you are in agreement, NV Energy requests written confirmation that it is acceptable to meet the reporting requirements of Section XII.1 as described in the table below.

<b>AOC Section XII.1 Requirement</b>	<b>How NV Energy Will Comply With Requirement</b>
(a) describe the actions which have been taken toward achieving compliance with this AOC during the previous quarter;	To be included in monthly progress reports.
(b) include a summary of all results of sampling and tests and all other data received or generated by NPC or its Contractors or agents in the previous quarter;	Monthly progress reports will summarize data collection efforts, if they occurred during that month. Sampling data will be submitted to NDEP under separate cover as outlined in individual work plans.
(c) identify all Work plans, plans and other deliverables required by this AOC that were completed and submitted during the previous	To be included in monthly progress reports.

AOC Section XII.1 Requirement	How NV Energy Will Comply With Requirement
quarter;	
(d) describe all actions including, but not limited to, data collection and implementation of Work Plans that are scheduled for the next quarter and provide other information relating to the progress of construction including, but not limited to, critical path diagrams, Gantt charts and Pert charts;	To be included in monthly progress reports, Monthly Action Items, and Microsoft Project schedule of AOC activities that is updated monthly.
(e) include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays;	To be included in monthly progress reports, Monthly Action Items, and Microsoft Project schedule of AOC activities that is updated monthly.
(f) include any modifications to the Work plans or other schedules that NPC has proposed to the Division or that have been approved by the Division; and	To be included in monthly progress reports, Monthly Action Items, and Microsoft Project schedule of AOC activities that is updated monthly.
(g) describe all activities undertaken in support of the Community Relations Plan during the previous quarter and those to be undertaken in the next quarter.	To be included in monthly progress reports.

If you have any questions regarding this letter, please contact me at 702-402-1319.

Sincerely,



Michael Rojo  
Supervisor, Environmental Services  
Reid Gardner Station