



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

April 7, 2010

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 Response (NDEP) to:

Letter Report: Ponds D and G Solids Sampling Results and Proposed Soil Sampling Analytical Parameters

Dated: March 4, 2010

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's above-identified Deliverable and finds that the document is acceptable with the exceptions noted in Attachment A for the administrative record. NVE should address these exceptions with errata **by April 21, 2010**. Additionally, NVE should contact NDEP **by April 9, 2010** to schedule a meeting to discuss Ponds D and G Solids Removal Schedule. Please contact the undersigned with any questions or comments about this letter at (702) 486-2850 ext 240 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office
Fax: 702-486-5733

SH:sh

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, NV
Greg Lovato, Bureau of Corrective Actions, NDEP, Carson City, NV
Tansey Smith, Tribal-State Environmental Liaison, NDEP, Carson City, NV

Jeryl Gardner, Bureau of Water Pollution Control, NDEP, Carson City, NV

cc: Ebrahim Juma, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central Pkwy, 1st floor,
P.O. Box 555210, Las Vegas, NV 89155-1741741
Darren Daboda, 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 Gentili, Department of Water Resources, 1416 9th Street, Room 1118, Sacramento CA 95814
David Sharp, NV Energy, PO Box 98910 MS 30, Las Vegas, 89151-0001
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Becky Svatos, Stanley Consultants, Inc., 2658 Crosspark Road, Suite 100, Coralville, IA 52241
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John Kivett, Arcadis, 8961 West Sahara Avenue, Suite 106, Las Vegas, NV 89117

Attachment A

1. General comment, being that the depth to groundwater in the vicinity of Ponds D and G has been measured as low as 8.5 feet below ground surface (fbgs), NVE should also compare the collected solids sampling data to the Leaching Basic Comparison Levels (LBCLs) using a dilution attenuation factor (DAF) of one (1). Therefore based on this comparison, NDEP is requesting the following errata:
 - a. Page 4 of 4, the list of analytes for confirmation sampling should additionally include:
 - i. Aluminum
 - ii. Barium
 - iii. Boron
 - iv. Total chromium
 - v. Iron
 - vi. Magnesium
 - vii. Manganese
 - viii. Mercury (Pond G only)
 - ix. Molybdenum
 - x. Nickel
 - xi. Selenium
 - b. Tables, revised comparison tables (Tables 1-1, 1-2, 2-1 and 2-2) that include the leaching comparisons.
2. Pages 1 and 2 of 4, Pond Solids Sampling Activities, NDEP noted that samples were collected by drilling and split-spoon sampling (Pond D) or using a backhoe and collecting grab samples (Pond G). NVE should provide additional information describing how the discrete and/or grab samples were selected for analysis from the continuous profile at Pond D and over the eight foot depth interval at Pond G. Additionally, NVE should provide details of how samples were selected and composited for the remaining SRC analytical testing at both ponds.
3. Page 4 of 4, Proposed Soil Sampling Activities, NDEP has noted that formaldehyde was detected in one of four discrete samples collected at Pond G with a concentration that exceeded screening level criteria. At Pond D, six of the nine discrete samples had detectable levels of formaldehyde but none exceeding screening level criteria. However, NDEP notes that these results suggest that formaldehyde is not uniformly distributed in the pond sediments and, as shown in Pond G, formaldehyde cannot be assumed not to occur at concentrations above the screening level criteria anywhere within Pond D. Therefore, NVE should include formaldehyde in the analyses of the native soils beneath Pond D as well as Pond G.