



**Indian River Power Inc.**  
29416 Power Plant Road  
Power Plant Road  
Dagsboro, Delaware 19939

*An NRG Energy Company*

July 28, 2011

Mr. Greg DeCowsky  
Delaware DNREC, SIRB  
391 Lukens Drive  
New Castle, DE 19720

**Subject: Remedial Investigation Report for Operable Unit 2 – Additional Edit  
Burton Island Historical Ash Disposal Area, DE-1399  
NRG-Indian River Power LLC**

Dear Mr. DeCowsky:

Indian River Power, LLC, a wholly-owned subsidiary of NRG Energy, Inc. (NRG), received a copy of a memorandum prepared by Rick Greene, Watershed Assessment, regarding “Fraction of Inorganic Arsenic in Fish & Shellfish + Other Bioaccumulation Issues.” The memorandum dated March 28, 2011 is addressed to Tim Ratsep of the Department of Natural Resources and Environmental Control (DNREC) Site Investigation and Remediation Section (SIRS) and was provided to NRG on July 26, 2011. Although the memorandum does not require a response, NRG proposes an edit to the February 2011 Remedial Investigation Report (RIR) to acknowledge and incorporate the findings of the memorandum. The memorandum provides additional support for statements already included in the RIR. This proposed edit would be in addition to those edits identified in NRG’s response to comments letter dated July 22, 2011.

NRG proposes the following edits to the RIR:

- In Section 5.1.3.4., on Page 5-23, first full paragraph, after the sentence beginning with: “In other words, the modeled arsenic concentrations in fish/shellfish...,” add the following sentences: “This is likely due to the fact that the sediment-to-biota BAF used to estimate fish and shellfish tissue concentrations is “3 to 8 times greater than indicated by field data” (Greene, 2011) and the sediment concentration of arsenic used to estimate fish/shellfish tissue concentrations “...is considerable greater than other arsenic measurements in sediments in the Inland Bays” (Greene, 2011). These conservative assumptions result in a significant over-estimation of COPC concentrations in the tissues of fish and shellfish as the calculated COPC concentrations in fish/shellfish tissues “...are approximately 1 to nearly 2 orders of magnitude greater than measured concentrations of arsenic in fish and shellfish from the Inland Bays” (Greene, 2011).”

- In Section 7, on Page 7-3, add a reference for the memorandum as Greene, 2011.

With your approval of the edits identified above, and at your request, we can reissue the revised RIR. Please contact me with questions or for additional information at 302.540.0327 or via email at david.bacher@nrgenergy.com.

Sincerely,



David Bacher  
Regional Manager, Environmental Business  
NRG Energy

cc: T. Ratsep, DNREC-SIRS (electronic)  
E. Quirk-Hendry, NRG (electronic)  
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