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July 28, 2005

City of Las Vegas  
Department of Public Works  
400 East Stewart Street  
Las Vegas, Nevada 89101

Attention: Charles Kajkowski, Jr. P.E.  
City Engineer/Deputy Director of Public Works

Subject: City of Las Vegas Water Pollution Control Facility - Odor Measures Assessment

Dear Mr. Kajkowski:

On July 21, 2005, the City of Las Vegas (City) requested that Carollo Engineers (Carollo) review two documents prepared for the City and advise them of the validity of issues identified in the documents and the relevance of these issues to possible changes to the buffer zone. These documents are:

1. Memorandum dated July 13, 2005 titled, "City of Las Vegas WPCF - Assessment of Odor Control Improvements Effects of Converting Royal Links Golf Course to Residential Develop on Odor Complaints"
2. Associated cover letter with the subject line, "City of Las Vegas Water Pollution Control Facility - Odor Measures Assessment"

The memorandum focuses on odor control at the Water Pollution Control Facility (WPCF), and touches briefly on future plant expansion needs. The cover letter discusses odor control measures and identifies two additional issues: the existence of hazard conditions and flood protection.

We offer the following comments on these four issues

Odor Control

1. The WPCF is, by nature, a facility that generates odors. Concern about odors is a valid issue.
2. The City has implemented odor control improvements at the WPCF that have reduced odor complaints. The existing buffer zones are identified as an element of odor control. Changes to the buffer zone around an expanded facility would impact the odor control program.

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3. The sewer junction box at Vegas Valley Drive and Stephanie Street is buried. The potential for odor generation at the sewer junction box is a valid issue if the berm at that location is removed, or if there are topographic changes to the area as part of future development.

#### Plant Expansion

1. The WPCF Master Plan identifies future plant expansion in the northwest corner of the plant site. Future plant expansion is a valid issue. Reducing the buffer zone around an expanded facility would impact the odor control program for an expanded facility.

#### Hazardous Conditions

1. The EPA regulations in 40CFR Part 68 require a hazard analysis for wastewater treatment plants that generate, store and/or use hazardous chemicals. Hazardous conditions are a valid issue.
2. A Risk Management Plan will be needed to determine impacts due to changes to the buffer zone.

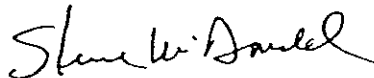
#### Flood Protection

1. EPA reliability regulations require Flood protection for wastewater treatment facilities. Flood protection is a valid issue.
2. Changes to the buffer zone will dictate that the berm design be reviewed to insure adequate flood protection.

Based on our review of the two documents, we concur with the recommendations in the memorandum and cover letter for further study.

Sincerely,

CAROLLO ENGINEERS, P.C.



H. Stephen McDonald, P.E.

HSM:rp