



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

September 6, 2011

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:
Groundwater Sampling Plan, NV Energy, Reid Gardner Station, Moapa, Nevada -
DRAFT
Dated: December 2010

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's above-identified Deliverable. A revised Deliverable should be submitted based on the comments found in Attachment A. Please advise the NDEP regarding the schedule for this resubmittal. NVE should additionally provide an annotated response-to-comments letter as part of the Revised Deliverable submittal.

Please contact the undersigned with any questions or comments about this letter at (775) 687-9332 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Carson City Office
Fax: 775-687-8335

JK:sh

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
William Knight, Bureau of Corrective Actions, NDEP



Lina Tanner, AG Office
Tansey Smith, Tribal-State Environmental Liaison, NDEP
Nadir Sous, Bureau of Water Pollution Control, NDEP
Jeryl Gardner, Bureau of Water Pollution Control, NDEP
Alan Tiney, Bureau of Water Pollution Control, NDEP
Tracy Taylor, Division of Water Resources
Ebrahim Juma, Clean Water Team
Joe Leedy, Clean Water Team
Kathryn Hoffmann, Clean Water Team
Dennis Campbell, Southern Nevada Health District
Walter Ross, Southern Nevada Health District
Starla Lacy, NV Energy
David Sharp, NV Energy
Tony Garcia, NV Energy
Jason Reed, NV Energy
Becky Svatos, Stanley Consultants, Inc.
William Carrig, Stanley Consultants, Inc.
John Kivett, Arcadis

cc: William Anderson, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025
Noelle Gentilli, Department of Water Resources, 1416 9th Street, Room 1118, Sacramento CA 95814

Attachment A

1. General comment, NDEP is aware that several wells have been added, replaced, or abandoned since the submittal of this Deliverable. Please revise this Deliverable to address any changes to the SAP due to these new or abandoned wells.
2. Section 3.5, Page 3-2, NDEP has the following comment: The report states, "*Purge water will not be used to fill sample bottles and wells will be allowed to recharge up to 80% of the static water column prior to sample collection*". This protocol does not appear to be consistent with the referenced EPA Groundwater Sampling SOPs provided in the QAPP. For instance the U.S. EPA Region 9 Field Sampling Guidance Document #1220, Groundwater Well Sampling states that "*It is particularly important that wells be sampled as soon as possible after purging. If adequate volume is available, the well must be sampled immediately.*" In situations where the well is pumped dry, the guidance indicates that this "*...generally constitutes an adequate purge and the well can be sampled following sufficient recovery (enough volume to allow filling of all sample containers).*" NVE should revise this discussion accordingly. Alternately, NVE could consider using a low flow sampling SOP.
3. Appendix B, More rationale and documentation should be included regarding the discussion of the proposed sampling frequency and parameter list. For example, some parameters are proposed to be removed for wells that have had historical exceedances (i.e. - chromium and molybdenum in LMW-9) and some analyses are proposed to be reduced without explanation (i.e. - reduced EPA Method 8260 scan for HM-50 replacement well). The supporting documentation provided should be included in the Appendix and not as a separate document.