



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 27, 2013

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:
First Semi-Annual 2013 Groundwater Monitoring and Remediation Report
Dated: May 14, 2013

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's above-identified document dated May 14, 2013. The subject document contains semi-annual groundwater monitoring results for RGS. Please review and address the comments from NDEP included in Attachment A.

Please contact me with any questions or comments about this letter at (775) 687-9396 or aOakley@ndep.nv.gov.

Sincerely,

Alison Oakley, CEM
Environmental Scientist III
Bureau of Corrective Actions
NDEP-Carson City Office
Fax: 775-687-8335



ec: Greg Lovato, Bureau of Corrective Actions, NDEP
Scott Smale, Bureau of Corrective Actions, NDEP
Todd Croft, Bureau of Corrective Actions, NDEP Las Vegas
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cc: William Anderson, 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 Gentilli, Department of Water Resources, 1416 9th Street, Room 1118, Sacramento CA 95814

Attachment A

- 1) **General Comment:** The subject document indicates several concerns regarding wells and/or conditions of wells. NDEP recommends dedicating a portion of a future work shop to specifically discuss these wells and the associated concerns.

- 2) **Page 4, Summary of Analytical Results:** It would be helpful to include a copy of the table called *Annual Sampling Record* in the body of the Report rather than on the CD. Knowing what wells are in which area (ex., Pond Wells, Mesa Wells, etc.) helps with understanding the discussion in the Report.

- 3) **Page 4, Summary of Analytical Results:** It was noted that many of the wells are pumped dry during purging. NVE might consider using low-flow/micro purging and sampling methods, or a sampling technique such as HydraSleeve sampling. This could enable sample collection without well dewatering.

- 4) **Page 5, Hogan Wash Area:** Wells specific to the Hogan Wash area are not listed as such on the Annual Sampling Record table. If Hogan is being individually discussed, the wells should be separately listed. The same reasoning applies to the Unit 4B/C Pond wells and the Unit 4A Pond wells.

- 5) **Page 8, Dissolved Chlorinated Solvents:** There is not actual discussion about chlorinated solvents in this section. Please discuss how the petroleum free product that is bailed from HM-50R and HM-48 is disposed. Free product potentially containing chlorinated solvent constituents should be properly disposed of as hazardous waste.

- 6) **Page 9, Diesel Recovery Discussion:** Diesel free product typically emulsifies when removed from the aquifer via dual phase extraction. NVE should evaluate if the product recovery numbers represent true free product or recovered product in emulsion with water.

- 7) **Editorial Comments:**
 - a. Page 7, third paragraph add – “found in the laboratory *results* when...”
 - b. Page 8, 4th paragraph change – “having a *lite* tan hue” to “having a *light* tan hue”.