

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

November 26, 2014

Mr. Jason Reed
Environmental Services
NV Energy
6226 W Sahara Ave M/S 30
Las Vegas, NV 89146

Re: **NV Energy (NVE)**
Reid Gardner Station (RGS)
NDEP Facility ID #H-000530
Nevada Division of Environmental Protection (NDEP) review of the Draft *NV Energy Reid Gardner Generating Station Request for Concurrence of Groundwater Monitoring Program Changes*

Dear Mr. Reed:

The NDEP has received and reviewed the Draft *NV Energy Reid Gardner Generating Station Request for Concurrence of Groundwater Monitoring Program Changes*, received by NDEP on September 25, 2014. The program changes request provides documentation with rationale for a request to change the sampling frequency and parameter list of monitoring well sampling at the Reid Gardner Generating Station. This request includes a memo summarizing proposed changes, a Response to Comments tracking form from a previous Draft Groundwater Sampling Plan, and tables and figures providing supporting documentation. Comments from the NDEP are included in Attachment A. The NDEP concurs with the requested changes as follows:

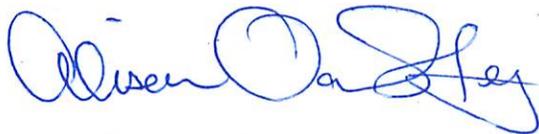
- KMW-1S: **Disagree** – Keep in monitoring program or provide replacement immediately.
- KMW-19: **Agree** – Remove from the sampling program, but revisit when investigation of Hogans Wash begins.
- CMW-1D: **Disagree** – Keep in monitoring program. Revisit as part of Pond 4A investigation work plan.
- CMW-1S: **Agree** – Remove from the sampling program.
- P-4: **Disagree** – Keep in monitoring program.
- P-6R: **Agree** – Remove from monitoring program.
- P-8R: **Agree** – Remove from monitoring program.
- KMW-9: The NDEP requests more detail about KMW-9 before agreeing to abandonment.
- P-12: **Agree** – Remove from monitoring program.



- P-14R: **Disagree** – Keep well in the program, but NVE may reduce frequency of monitoring to annual.
- P-17A: **Agree** – Remove from monitoring program.
- P-18A: **Agree** – Remove from monitoring program.
- P-20A: **Disagree** – Keep P-20A, but remove P-20B from monitoring program.
- HM-19: **Agree** – Remove from monitoring program.
- HM-20: **Agree** – Remove from monitoring program.
- HM-24: **Agree** – Remove from monitoring program.
- Parameter Reduction: **Agree** with all requested parameter reduction except for phosphate (phosphorus), and include this analysis for ALL monitoring wells (including Pond wells). As discussed below, phosphate has not been routinely included in the protocol for groundwater monitoring analyses; rather, total phosphorous as P appears to be the routinely measured parameter. Keep total phosphorous as P on the parameter list.

Please refer to the comments from NDEP, located in Attachment A, for rationale for our decision. 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

ec: Jeff Collins, Nevada Division of Environmental Protection (NDEP)
Scott Smale, Bureau of Corrective Actions, NDEP Carson City
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cc: Alteha Tom, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025
Darren Daboda, Moapa Band of Paiutes, Environmental Director, P.O. Box 340, Moapa, NV 89025
Clark County Emergency Management, 500 S. Grand Central Parkway 6th Floor, P.O. Box 551713, Las Vegas, NV 89155-1713
Anitha Rednam, Department of Water Resources, 1416 9th Street, Room 1140, Sacramento CA 95814

Attachment A

Review of the Draft NV Energy Reid Gardner Generating Station Request for Concurrence of Groundwater Monitoring Program Changes.

1. KMW-1S: The NDEP sees this as a critical well for the Hogan's Wash area and the NDEP does not want a well in this location removed from the monitoring program. If this well is removed from the sampling program and/or abandoned, the NDEP would like to see a replacement well installed in a timely fashion so it can continue to provide data to the monitoring program.
2. KMW-19: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time. Monitoring requirements for this well may be revisited when the investigation of Hogans Wash begins.
3. CMW-1D: The NDEP would like this well to remain in the sampling program because we have limited deep monitoring points. We can revisit the need for this well when the new wells are installed as part of the Pond 4A investigation.
4. CMW-1S: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only.
5. P-4: The NDEP sees P-4 as a critical monitoring point in the downgradient direction of Pond E-1, and therefore important for trend analysis. This well has the highest TDS in a line that decreases towards the Muddy River from P-4 to P-22 to P-19AR. This well may be part of multiple lines of evidence that point towards attenuation.
6. P-6R: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time. The NDEP may request that this well be reinstated as a monitoring point if P-7R becomes erratic in trend evaluations.
7. P-8R: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time. The NDEP may request that this well be reinstated as a monitoring point if P-7R becomes erratic in trend evaluations.
8. KMW-9: The NDEP would like some detail about KMW-9 before agreeing to abandonment. KMW-9 is 61 feet deep and is labeled as a medium or deep well. P-10 is a 68 feet deep well that is labeled as a shallow well. Please provide the basis for the different labels (shallow or not). The NDEP would like the well construction logs or confirmation of the screened interval for these two wells. Note that the NDEP may ask for a medium and/or deep well as part of the Pond F investigation work.
9. P-12: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time. Additionally, the NDEP would like to confirm the screen intervals for P-11 and P-12.

10. P-14R: This well is in a down gradient line toward the Muddy River from P-13R to P-15AR for trend monitoring. The NDEP would like to keep this well in the program, but agrees that the frequency of monitoring can be reduced to annual.
11. P-17A: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time.
12. P-18A: This well may be removed from the sampling program and used as a groundwater elevation monitoring point only at this time.
13. P-20A: The NDEP would prefer to keep P-20A because of the spikes on TDS trends, but would allow P-20B to be removed from the monitoring program.
14. HM-19: This well may be removed from the sampling program and used as a groundwater elevation/free product monitoring point only at this time. The NDEP would like an oil/water interface probe used to monitor this well during gauging.
15. HM-20: This well may be removed from the sampling program at this time, but should be re-evaluated when free product is no longer present in the well.
16. HM-24: This well may be removed from the sampling program and used as a groundwater elevation/free product monitoring point only at this time. The NDEP would like an oil/water interface probe used to monitor this well during gauging.
17. Parameter Reduction: The NDEP concurs with the reduction of all parameters requested except for phosphate. It should be noted that, based on the historical data tables for the site, phosphate has not been routinely included in the analyte list for groundwater. Rather, total phosphorous as P appears to be the parameter that has been routinely measured. Phosphorous is a parameter that is shown to have higher concentrations in surface water at the downstream Muddy River sample location (MR-4) than at the upstream Muddy River sample locations (MR-UP, and MR-1-3). Given that there appears to be a data gap for phosphorous, it is recommended that it is sampled for in all monitoring wells, including Pond wells where it has not previously been sampled. Additionally, the upcoming work plans for pond assessment should incorporate speciation of phosphorous in soil and groundwater.