



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
Colleen Cripps, Ph.D., Administrator

October 15, 2015

Jason Reed
Senior Environmental Advisor
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 Comments to: *Draft Work Plan for Light Non-Aqueous Phase Liquid Conceptual Site Model Development for Petroleum Source Area 14*

Dear Mr. Reed:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed NV Energy's (NVE's) work plan for Light Non-Aqueous Phase Liquid (LNAPL) Conceptual Site Model (CSM) Development at Source Area 14 (SA-14). The work plan is dated September 8, 2015 and was received by the NDEP on September 10, 2015.

The work plan presents the data collection activities that will support a CSM to address the presence of LNAPL at the main plant area of RGS. In general, this work plan was well written. Based on review of this work plan, the NDEP has technical and editorial comments, which are located 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

Mr. Jason Reed
RGS – SA-14 LNAPL CSM.
October 15, 2015
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Anitha Rednam, Department of Water Resources, 1416 9th Street, Room 1140, Sacramento CA 95814

Attachment A

Technical Comments for the LNAPL CSM at SA-14

1. Page 8, Section 3.2.3.1, first paragraph, second sentence – This sentence states, “Three soil borings will not be converted to monitoring wells (due sufficient coverage)...” Provide explanation regarding meaning of “sufficient coverage”.
2. Page 14, Section 3.5.2, second to last paragraph – This paragraph discusses a baseline sampling event that will be performed on wells containing measureable LNAPL. Please provide additional explanation regarding sample type to be collected during this baseline sampling event (e.g., LNAPL only, groundwater only, or mixed groundwater and LNAPL). Please provide sample collection methodology if different from sample methods described in paragraph one of Section 3.5.2. For example, if the goal is to collect a groundwater only sample, describe sampling methods that will be utilized to prevent introduction of LNAPL into the groundwater sample.

Editorial Comments for the LNAPL CSM at SA-14

3. Page 2, Section 2.1, third sentence to end – This discussion could be phrased more clearly, or, for clarity, a figure could be added to show the land use described in the discussion.
4. Page 3, Section 2.2, first full sentence on page – Revise “The Muddy Creek Formation underlies the alluvium and slopes from a depth...” to The Muddy Creek Formation underlies the alluvium and **varies** from a depth...” The term “slope” connotes that the beds or formation have a “dip” in a specific direction.
5. Page 3, Section 2.2, sixth sentence on page – Please revise this sentence to state that “groundwater **flow ranges from** the southeast to east.”
6. Page 7, Section 3.2.3, third paragraph, second sentence – This sentence states, “The total depth of each boring may be adjusted based on field conditions encountered, but are anticipated be...”. Revise the sentence to “The total depth of each boring may be adjusted based on field conditions encountered, but are anticipated **to** be...”
7. Page 8, Section 3.2.3.1, first paragraph, second sentence – This sentence states, “Three soil borings will not be converted to monitoring wells (due sufficient coverage)...” Revise sentence to, “Three soil borings will not be converted to monitoring wells (due **to** sufficient coverage)...”
8. Page 12, Section 3.4, second paragraph, first sentence – This sentence states, “Logistically, testing will only be performed...” Revise sentence to, “Logistically, **transmissivity** testing will only be performed...”
9. Page 12, Section 3.4, second paragraph, second sentence – This sentence states, “The testing will be performed to provide baseline values for recovery system operations...” revise sentence to, “The transmissivity testing will be performed to provide baseline **LNAPL transmissivity** values for recovery system operations...”