



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 22, 2015

Michael Rojo
Environmental Services, Supervisor
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:
Document and Response to Comments Tracking Form for PA2, PA3, and PA5-7
Groundwater and Soil Characterization Work Plans, dated August 18, 2015

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's submittal of the Response to Comments (RTCs) for the PA2, PA3, and PA5-7 Groundwater and Soil Characterization Work Plans (Work Plans). The RTCs were received by the NDEP on August 18, 2015. The Work Plans describe groundwater and soil investigations to be conducted in the area of former Pond 4B and 4C (PA2), 4A (PA3), and D, E, F, and G (PA5-7). The NDEP has two comments to the RTCs that are included in Attachment A. Once these editorial comments are addressed, the NDEP **concurs** with the revised pond work plans. NVE may finalize the work plans by sending revised pages and cover sheets for insertion into the draft documents.

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

Attachments (1)
Attachment A – NDEP Comments

Mr. Mike Rojo
PA2, PA3, PA5-7 Work Plans RTCs
October 22, 2015
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ec: Jeff Collins, Nevada Division of Environmental Protection (NDEP)
Scott Smale, Bureau of Corrective Actions, NDEP Carson City
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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

1. Specific Comment #3 for PA2, PA3, and PA5-7 RTCs: The comment response for specific comment #3 is written more clearly than the text in the work plan. Suggested revision to the text in the work plan using the discussion listed in the response to comment #3 is:

First priority is given to TDS because it is the key indicator for evaluating the extent of contamination. Because specific conductance and pH can be measured in the field from a small sample volume, they are also included as first priority analytes. The second priority ~~for analytes, chloride, fluoride, nitrate, and sulfate, is the same because~~ can all be analyzed from the same sample bottle as TDS. These parameters are also important for evaluating the extent of contamination. Alkalinity is next on the priority list because it is analyzed from the same sample bottle as TDS and it is needed to conduct a cation-anion balance on the higher priority analytes. Fourth priority is given to density because it can also be analyzed from the same bottle as TDS the first three priority analytes. Density is used to evaluate potential density driven flow. Fifth priority is assigned to the metals; ~~which because they require an additional can all be analyzed from the same~~ sample bottle. ~~because~~ They are important indicators of the extent of contamination.

Phosphorus and the metals speciation analytes are given lower priorities because they are only needed to support the geochemical CSM. After the discrete groundwater sampling is completed, the direct push sampling tool will be removed and the borehole will be backfilled with bentonite slurry.

2. PA2 Specific Comment #11 and PA3 Specific Comment #10: The response to Specific Comment #10 in the PA5-7 RTCs is more complete than the responses in the PA2 and PA3 RTCs. Suggest that you use the response provided in PA5-7 in the other two RTCs.