



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
David Emme, Administrator

November 19, 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
NVE's Response to NDEP's July 17, 2015 Comments to the *Preliminary Geochemical Conceptual Site Model*, Draft March 2015

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's submittal of the revised DRAFT report titled *Preliminary Geochemical Conceptual Site Model* (revised Geochemical CSM), dated November 5, 2015, and NVE's response to NDEP's July 17, 2015 comments (RTCs). The revised Geochemical CSM and the RTCs were received by the NDEP on November 16, 2015. The revised Geochemical CSM describes a preliminary geochemical conceptual site model for indicator constituents of concern in groundwater at RGS.

The NDEP has one reply to the RTC for comment 12, which is included in Attachment A.

The NDEP **concurs** with the Response to Comments provided by NVE. NVE may finalize the revised Geochemical CSM by sending revised pages and cover sheets for insertion into the draft document.

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
Preliminary Geochemical CSM RTCs
November 19, 2015
Page 2 of 3

- cc: Jeff Collins, Nevada Division of Environmental Protection (NDEP)
Scott Smale, Bureau of Corrective Actions, NDEP Carson City
Todd Croft, Bureau of Corrective Actions, NDEP Las Vegas
Bill Campbell, Tribal Liaison, NDEP
Alan Tiney, Bureau of Water Pollution Control, NDEP
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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

Original Comment 12:

Section 6.4, Page 25 – This section provides a discussion of TDS concentration trends in groundwater. The text of this section states that “Time-trend analysis on TDS concentrations in individual wells confirms that there is no systematic increase in TDS concentrations across the groundwater monitoring network (Figure 6-7).” This is a rather strong statement considering that there are 18 shallow zone wells and 7 deeper wells exhibiting increasing trends. Further, the wells exhibiting the increasing trends are generally located downgradient of or adjacent to the pond areas. Please revise this sentence to indicate that trend analysis indicates TDS trends are increasing in some areas of the site and stable to decreasing in other areas. Please provide a summary table that includes the following information for each groundwater monitoring location included in the TDS concentration trend evaluation:

1. Historical range of TDS concentrations,
2. Most recent TDS concentration,
3. Time period of monitoring, and
4. Direction of TDS concentration trend with time.

NVE Response:

The text has been revised to clarify there are no overall, systematic TDS increases in shallow, alluvial groundwater and a reference has been added to a new table in Appendix C with the requested information

NDEP’s November 18 Reply:

It is important to note that there are several shallow zone wells that exhibit increasing COC concentration trends identified in the TDS trend analysis table included in Appendix C, and for the most part, these wells are located in the immediate vicinity or downgradient of pond areas.