

DOCKETED	
Docket Number:	09-AFC-05C
Project Title:	Abengoa Mojave Compliance
TN #:	271048
Document Title:	Water Board and CEC Comments on the Alpha East Land Treatment Unit Final Remediation Plan for the Mojave Solar Project
Description:	Lahontan Regional Water Board and CEC Comments on Alpha East Land Treatment Unit Final Remediation Plan
Filer:	Ashley Gutierrez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	6/26/2026 3:54:10 PM
Docketed Date:	6/26/2026

Lahontan Regional Water Quality Control Board

June 24, 2026

Commission Order: 10-0908-8

GeoTracker Global Identification: T10000005850

Mahnaz Ghamati
Quality, Environmental & Compliance Manager
Atlantica Sustainable Infrastructure LLC
43134 Harper Lake Road
Hinkley, CA 93247
Mahnaz.ghamati@atlantica.com

COMMENTS ON THE REVISED REMEDIATION AND GROUNDWATER ASSESSMENT WORKPLAN FOR THE ALPHA EAST LAND TREATMENT UNIT, MOJAVE SOLAR PROJECT, HINKLEY, SAN BERNARDINO COUNTY

The *Revised Remediation and Groundwater Assessment Work Plan for the Alpha East Land Treatment Unit* (Work Plan) was received on June 16, 2026. The Work Plan was submitted by Mojave Solar Project (MSP) staff to demonstrate compliance with written directives issued by the California Energy Commission (Commission) and the Lahontan Regional Water Quality Control Board (Lahontan Regional Board) on May 1, 2026. The Work Plan has been reviewed by both Commission and Lahontan Regional Board staff. Our comments are outlined below. Please submit a written response to the comments below by July 8, 2026.

COMMENTS

Section 2.3 Land Treatment Units, Paragraph 6 (Page 6)

Prior to construction of any new land treatment unit (LTU) the design must also be reviewed by, and stamped, for construction approval by the California Energy Commission, Delegate Chief Building Official.

Section 3.2 Grab Groundwater Sampling Using Hydropunch®, Perched Groundwater Monitoring Well Installation, Bullet 7 (Page 9)

Well development should consist of preliminary and final development. Preliminary well development will be conducted using a surge block after installation of the well screen, casing, and primary filter pack, but prior to installation of the transition seal and grout seal. Additional filter pack should be added, as needed, after completion of preliminary well development to bring the filter pack up to the desired depth. Final well development should begin 72 hours after the grout seal has been placed, to allow the grout to set.

JEFF LOUX, CHAIR | BEN LETTON, EXECUTIVE OFFICER

The pump should be placed in the middle of the saturated portion of the well screen. Pumping should occur at a high rate (e.g., 10 to 15 gallons per minute) until at least 10 well volumes have been removed or until turbidity reaches the desired level as measured by a turbidity meter. Pumping should then be discontinued, and surging should begin using a properly designed surge block and proper surging techniques. Pumping and surging should be cycled until the well yields water of acceptable turbidity at the beginning of the pumping cycle. High turbidity can bias metal results high, so it is good to ensure you have the desired turbidity readings prior to discontinuing well development.

Section 3.2 Grab Groundwater Sampling Using Hydropunch®, Perched Groundwater Monitoring Well Installation, Bullet 8 (Page 9)

Groundwater samples should be collected from the monitoring wells 72 hours to one week after well development to allow materials to settle and water quality parameters to equilibrate with the water bearing formation. Please ensure the wells are purged prior to sample collection. Well should be purged at a low-flow rate, 100 to 500 milliliter per minute (mL/min). The goal is to extract water at a rate that minimizes drawdown and turbidity. As indicated in the comment above, high turbidity concentrations can bias metal results high. Finally, routine sampling of the new wells should coincide with the semi-annual detection monitoring program sampling.

Section 4 Contaminated Soil Excavation, Removal, and Alpha East LTU Closure, Paragraphs 3 - 4 (Page 11)

Since MSP has confirmed heat transfer fluid contaminated soil is no longer going to be treated in the Alpha and Beta LTUs, the contaminated soil is not authorized to be stockpiled or reused onsite. The material excavated from the Alpha East LTU must be placed in covered roll-off bins or 55-gallon drums for offsite disposal at an appropriately licensed facility. Composite soil samples will need to be collected to characterize the waste as Resource Conservation and Recovery Act (RCRA) hazardous or RCRA non-hazardous waste.

Section 4.2 Soil Excavation and Sampling, Bullet 4 (Page 12)

Diphenyl Oxide was detected in boring B5 at 11 ft bgs at a concentration of 8 mg/Kg. Please be prepared to excavate deeper than 8 ft bgs.

Section 4.2 Soil Excavation and Sampling, Bullet 8 (Page 12)

Please consider excavation shoring systems to prevent collapse and allow further excavation of contaminated soils.

Section 4.2 Soil Excavation and Sampling, Bullets 9, 10, 15, 16, 17 (Page 12 and 13)

The soil is not authorized to be stockpiled or reused onsite. The excavated material must be containerized, characterized, and transported offsite.

Section 4.2 Soil Excavation and Sampling, Bullet 11 (Page 12)

Prior to disposal, composite soil samples should be collected and analyzed for the parameters listed in Bullet 10 and Bullet 11.

Section 4.2 Soil Excavation and Sampling, Bullet 12 (Page 12)

Please describe how the confirmatory soil samples will be collected. Water Board staff prefer that VOC samples are field preserved using TerraCore® samplers (or other United States Environmental Protection Agency [USEPA] Method 5035 preservation).

Section 4.4 Prepare Report (Page 14)

Please ensure the soil and purge water waste characterization results are included in the final report for the waste disposal records.

Please contact me at your convenience if you have any questions regarding our comments. You may reach me at by telephone at (530) 542-5473, or alternatively you may contact me via email at kerri.okeefe@waterboards.ca.gov.



Kerri O'Keefe, PG
Engineering Geologist
Lahontan Regional Board

Cc (via email):

David Rosas Galindo, Mojave Solar Project (david.rosas@atlantica.com)
Ashley Gutierrez, Energy Commission (Ashley.Gutierrez@energy.ca.gov)
James Ackerman, Energy Commission (james.ackerman@energy.ca.gov)
Hurshbir Shahi, Energy Commission (Hurshbir.Shahi@energy.ca.gov)
Karim-Abdel Abulaban, Energy Commission (Abdel-Karim.Abulaban@energy.ca.gov)
Jeff Brooks, Lahontan Regional Water Board (Jeff.Brooks@waterboards.ca.gov)
David Ryan, Lahontan Regional Water Board (David.Ryan@waterboards.ca.gov)