DOCKETED	
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WATER RESOURCES

Author: James Ackerman

BACKGROUND

Follow-up to Data Request, Set 2, Response No. 2: The acronym "PI" is in the second sentence of the third paragraph.

DATA REQUEST

1. Please identify the term "PI".

Response to DR1.

AVEVA PI is a system used for data collection and analysis in industrial environments. It is designed to gather real-time data from various sources, such as sensors and control systems, and store it in a centralized database. MSP then can use this data for monitoring, analysis, and reporting purposes.

BACKGROUND

Follow-up to Data Request, Set 2, Response No. 2: The third paragraph states that feedwater flowmeter readings to the closed circuit reverse osmosis (CCRO) system are not reliable, and that flowmeter data from individual extraction wells is a more accurate indication of water treatment plant inflow. Staff needs assurance that all the extracted groundwater is directed into the water treatment plants (WTPs) and that no untreated water is used for other purposes, such as fire suppression.

DATA REQUEST

2. Please provide evidence that all the extracted groundwater is directed into the WTPs and that none of it is directed for other purposes, such as fire suppression.

Response to DR2.

Water drawn from the well pumps flows through a single pipe to the treatment plants. As shown in the image below, the discharge pipe has no extension for unauthorized connections. Accordingly, the pipe from the well pumps are physically limited from directing water outside the WTP for other purposes, such as fire suppression.

MSP Two New Permanent Evaporation Ponds-Data Requests-Set 3- Responses

MSP can provide confidential water treatment piping and instrument diagram to CEC Staff upon request.

LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD

Author: Kerri O'Keefe

BACKGROUND

Follow-up to Data Request, Set 2, Response No. 6: Based on Figure 4, it appears that the scope of work does not include construction of wells in the downgradient direction for both the Alpha and Beta ponds. Downgradient wells are necessary to establish background quality in the event of a release.

DATA REQUEST

3. The scope of work must be revised to include one well on the south side of both new evaporation ponds. Please provide an updated figure and scope of work that shows the proposed project revision includes one well on the south side of both new evaporation ponds.

MSP Two New Permanent Evaporation Ponds-Data Requests-Set 3- Responses

Response to DR3.

MSP is agreeable to providing additional groundwater monitoring wells and to revising the scope of work to include downgradient wells. Accordingly, MSP agrees to revise the scope of work reflected in Section 6.2, Basis of Design for New Evaporation Ponds, as follows:

> The ponds will include a leak detection system for detecting and collecting liquids between the liners that are essentially the same as the existing evaporation ponds. The design includes neutron probe monitoring pipes and perched groundwater monitoring wells for enhanced detection monitoring beyond the liner system. The basic design criteria includes:
>
> The size of each pond should be roughly 250,000 sf – similar to the existing ponds.
>
> 1- The depth of each pond should be nominally 10 feet, which includes the 2 feet of freeboard – this is also similar to the existing ponds.
> 2- The liner system shall include a lower 40 mil high-density polyethylene (HDPE) geomembrane, interstitial leak collection geonet, and upper 60 mil HDPE geomembrane. With the exception of using black conductive geomembrane (vs. white), the liner system is the same as existing ponds.
> 3- The leak detection sump, piping and manhole system is the same as existing ponds.
> 4- Neutron probe test pipes and ground water detection monitoring wells will be installed for enhanced monitoring for leaks, consistent with the existing ponds.
> 5- An additional perched groundwater detection monitoring program well will be installed on the south side of each of the proposed, new Alpha and Beta evaporation ponds.
> 6- From a constructability perspective, the design of the ponds was graded in an attempt to balance the amount of cut and the amount of fill to reduce overall construction costs and exporting of material to a stockpile.

MSP is also updating Figure 4 from the prior data response to include MWP-A700 and MWP-B700 on the south side of the proposed Alpha and Beta evaporation ponds, respectively. The updated figure is included in Appendix 1. These two wells will be installed in a similar manner as the existing and proposed perched groundwater monitoring wells, with an approximate 35 to 45 foot depth. The two

additional wells will provide background water quality and assist in the overall monitoring program for detecting leaks from the evaporation ponds.

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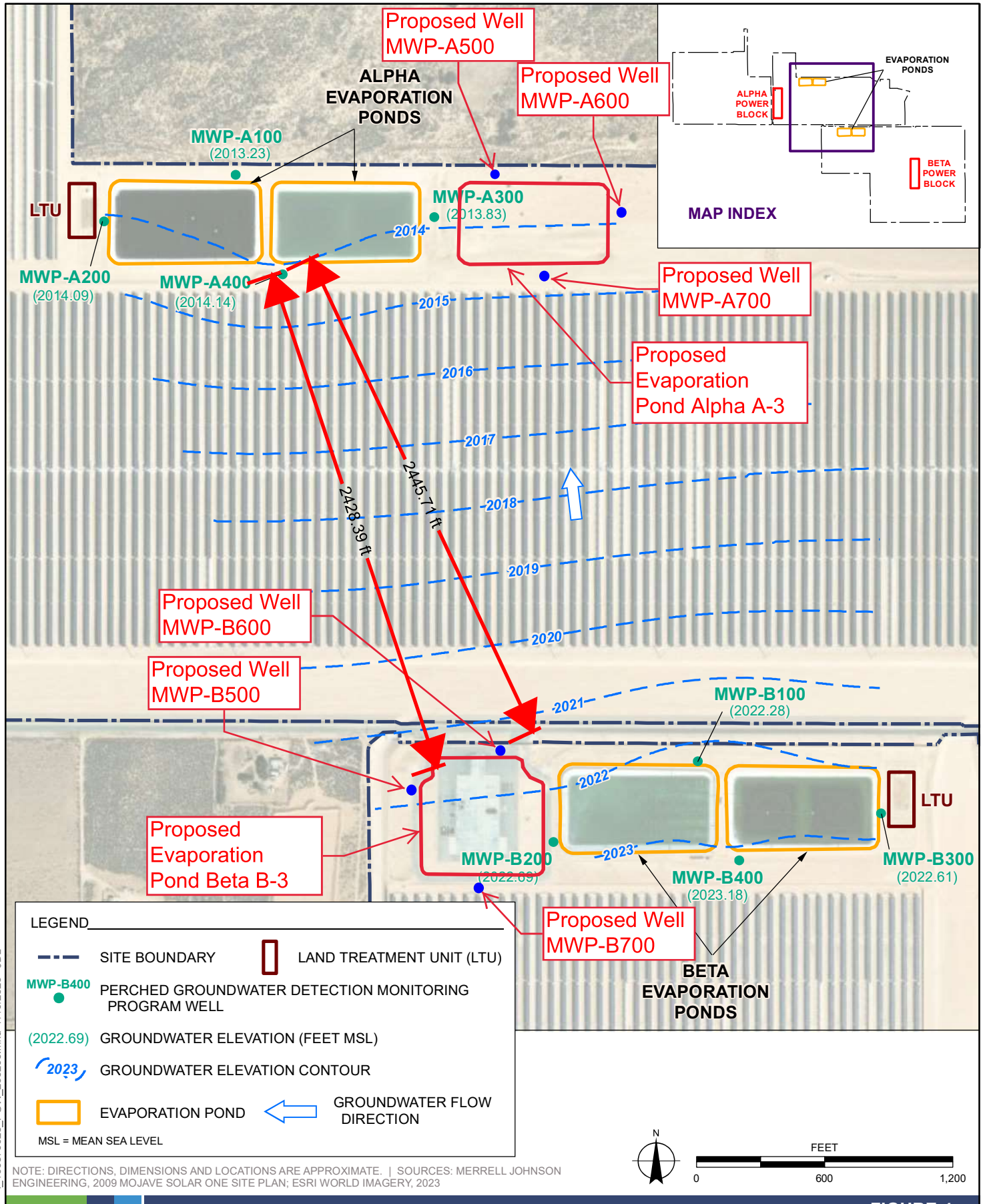
Atlantica
Sustainable Infrastructure

Appendix 1

Updated Perched Groundwater Wells



NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE. | SOURCES: MERRELL JOHNSON ENGINEERING, 2009 MOJAVE SOLAR ONE SITE PLAN; ESRI WORLD IMAGERY, 2023

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FIGURE 4

PERCHED GROUNDWATER ELEVATIONS - FEBRUARY 7 AND 8, 2023

MOJAVE SOLAR PROJECT
SAN BERNARDINO COUNTY, CALIFORNIA

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Ninyo & Moore
Geotechnical & Environmental Sciences Consultants