

To: Nevada Division of Environmental Protection
Nevada Environmental Response Trust

Cc: Nevada Environmental Response Trust Stakeholders

From: Ryan Sullivan, Vice President Service and O&M

Date: Sept 20, 2018

Subject: NERT – GWETS Operation Monthly Report – August 2018

At the request of the Nevada Environmental Response Trust (Trust), Envirogen Technologies, Inc. (ETI) is providing this summary of the groundwater extraction and treatment system (GWETS) operation and performance during August 2018.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in August 2018. Flow from PC-119, PC-120, PC-121, and PC-133 was routed to the IX system, bypassing all flow meters associated with the FBR plant. The flow rate to the IX system averaged approximately 181 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 1,005 gpm during August 2018. At the end of the month, the GW-11 Pond volume was at 34.8 million gallons (MG), which would allow 19.2 days of available additional storage in the event of an emergency FBR plant shutdown with continued well field pumping. The water volume stored in the GW-11 Pond increased approximately 0.4 MG from the end of July 2018. Figure 1 in this report depicts the actual GW-11 pond volumes and additional storage available.

The influent perchlorate concentration to the IX system averaged 0.62 mg/L for the month. The influent perchlorate concentration to the FBR plant averaged 106 mg/L for the month, with a maximum concentration of 110 mg/L. In comparison, the influent perchlorate concentration to the FBRs for the month of July 2018 averaged 113 mg/l, with a maximum concentration of 120 mg/l. Fluctuations in the influent perchlorate concentrations are due to the changes in the AP-5 treatment feed rate and not a result of groundwater changes.

Enhanced Operational Metrics

Tables 1 and 2 provide a summary of the current GWETS operational metrics data for flow rates, perchlorate and chromium concentrations, and mass removal. These tables also include data associated with the AP-5 decant liquids. Figure 2 graphically presents historical perchlorate and chromium mass flux information. Attachment A provides a summary of the NPDES permit analytes with numerical discharge limits.

Operational Issues

All routine plant repairs conducted by ETI were performed in accordance with the NERT Perchlorate Treatment System Operations Manual. The following is a list of operational issues and major repairs and/or equipment replaced during this reporting period.

1. GW-11

There were eleven diversions into GW-11 for the purposes of maintaining the GW-11 elevation level. Below is a description of the events that occurred:

- Effluent Diversion to GW-11 occurred on August 5, 2018 at 11:13pm to 4:30am to maintain the GW-11 elevation level. Approximately 325,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 7, 2018 at 11:18pm to 3:51am to maintain the GW-11 elevation level. Approximately 287,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 8, 2018 at 11:19pm to 4:46am to maintain the GW-11 elevation level. Approximately 341,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 9, 2018 at 11:22pm to 5:22am to maintain the GW-11 elevation level. Approximately 383,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 11, 2018 at 11:28pm to 5:28am to maintain the GW-11 elevation level. Approximately 378,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 18, 2018 at 11:18pm to 5:18am to maintain the GW-11 elevation level. Approximately 374,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 21, 2018 at 11:38pm to 5:28am to maintain the GW-11 elevation level. Approximately 353,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 26, 2018 at 11:56pm to 5:35am to maintain the GW-11 elevation level. Approximately 365,000 gallons of Effluent were diverted to GW-11.
- Effluent Diversion to GW-11 occurred on August 30, 2018 at 11:00pm to 5:00am to maintain the GW-11 elevation level. Approximately 389,000 gallons of Effluent were diverted to GW-11.

2. Biological Plant

Treatment of AP-5 water through the FBR Biological plant continued in the month of August starting with a flow rate of 1.5 gpm and increasing to a flow rate of 2.0 gpm throughout the month. This flow rate was necessary to maintain compliance with the reduced ammonia loading effluent limits for April through September specified in the NPDES permit.

There was one Influent diversion into GW-11 for maintenance purposes, one event that caused the extraction well fields and associated lift stations to be taken offline, two events that required an extraction well field to be taken offline for maintenance, and one event that required maintenance on an individual extraction well. Below is a description of the events that occurred:

Diversion Events

 Influent Diversion to GW-11 occurred on August 15, 2018 from 7:09am to 3:10pm due to a preplanned plant shutdown maintenance event. Approximately 500,000 gallons of Influent were diverted to GW-11.

- Unplanned shutdown of the SWF, AWF, and their associated Lift Stations including the IX system at LS1 on August 11, 2018 from 8:42pm to August 11, 2018 11:11pm due to an adverse weather event that disrupted the electrical power supply. The IX system was restarted at 10:33pm.
- Unplanned shutdown of extraction well I-V beginning on August 11, 2018 at 9:48pm until August 12, 2018 at 1:35pm due to damage to the overload switch caused by the adverse weather event of August 11, 2018.
- Unplanned shutdown of the IWF on August 13, 2018 from 11:48am to 3:10pm due to maintenance efforts on the extraction well I-V.
- Shutdown of the IWF on August 22, 2018 from 9:41am to 10:41am due to maintenance efforts at the GWTP including evaluation of the P-1(a) pump and piping and the Clarifier tank.

3. Spills

There were no reportable spills for the month of August.

4. Maintenance

- Major maintenance performed by ETI in the month included:
 - I. Installed a new 1" pump for the bed height control for FBR 2.
 - II. Installed new discharge fittings on extraction well I-AD.
 - III. Replaced the suction disc on media return pump 1.
 - IV. Installed a new 1" pump for the bed height control for FBR A.
 - V. Replaced the discharge check valve for the effluent caustic pump.
 - VI. Installed a new VFD for the effluent pump at GWTP.
 - VII. Installed a new discharge piping on FBR 5.
 - VIII. Installed new hose fittings, pump, pigtail, and motor in extraction well I-Q.
 - IX. Replaced the backflush line on the N.DAF sludge pump.
 - X. Installed a new Stabilized Lake Mead Water line for the wash down system of the DAF sludge boxes.
 - XI. Installed a new caustic line and fittings on the chemical metering pump.
- Preventative Maintenance completed or being performed by ETI in the month included:
 - I. Completed the rebuild of the spare bed height and media return pumps.
 - II. Pressure washed and re assembled the automatic strainers pulling from GW-11.
 - III. Performed quarterly service on the vertical turbine at lift station 2. This includes temperature readings, vibration tests and lubrication.
 - IV. Cleaned and re-installed the packing gland on the vertical turbine at lift station 1.
 - V. Visual inspection, vibration testing, and temperature checks of the coupling inserts were completed on the front stage recycle pumps and effluent pumps.
 - VI. Completed the infrared checks on all the electrical buckets looking for any loose connections.
 - VII. The filters were cleaned on the lift station air conditioner units.
 - VIII. Hampton Tedder (High Voltage Electrical contractor) completed the inspection on the main power switch coming into the plant.
 - IX. The discharge valves were actuated and serviced for proper function.

GWETS Upgrades and Facility Projects

Alumina Chlorohydrate (ACH) Pilot Study – At the direction of the Trust, ETI performed a pilot study that was completed in July 2018 to evaluate alternative coagulants in an effort to avoid the growth of iron bacteria within the Effluent pipeline. ETI has submitted the pilot report and updated the Operations and Maintenance Manual to include the use of Alumina Chlorohydrate as a coagulant. Following NDEP approval of the Revised Operations and Maintenance Manual, ETI will begin the transition to Alumina Chlorohydrate.

Geo-tube Pilot Study – At the direction of the Trust, ETI performed a pilot study to evaluate the use of Geo-tubes for sludge dewatering to increase the capacity of the Chromium Treatment Plant. The pilot test has been completed and the summary report was submitted to the Trust in July. The Trust is evaluating the findings of the pilot study report and whether infrastructure modifications at the Chromium Treatment Plant are appropriate at this time.

Equipment Availability Tracking

ETI operators continue to update the equipment tracking form on a weekly basis or whenever there is a change in the status of key equipment. During regular site visits, Tetra Tech field personnel verify the entries on the form, including both the operating status and confirmation of the inventory of required shelf spares. The equipment tracking form is included as Attachment B.

GWETS Staffing

ETI continues with 24-hour staffing of the GWETS at the direction of the Trust and continues to follow the security procedures in the Standard Operating Procedures (SOP).

Tables

Operational Metrics

Nevada Environmental R	Nevada Environmental Response Trust Groundwater Extraction and Treatment System Monthly Stakeholder Metrics											
Location ID	Average Flow Rate (gpm)	Perchlorate (mg/L) ^{6 7}	Chromium (TR) (mg/L) ^{6 7}	Chromium(VI) (mg/L) ^{6 7}								
SWF Total Extraction ¹	735 ⁵	8.3	0.0016	0.0016								
AWF Total Extraction ¹	466 ⁵	76	0.16	0.17								
IWF Total Extraction ¹	55 ⁵	527	7.5	7.9								
AP Area Total Extraction ¹	8.6 ⁵	895	0.071	0.065								
GWTP Effluent ²	57	622	0.26	ND								
GW-11 Influent ¹	6.7	52	0.37	0.021								
FBR Influent ^{2 3}	1,005	106	0.021	0.016								
T-205 Effluent (AP-5 Wash Water) ^{3 4}	1.8	15,725	NA	NA								

Notes:

TR = Total Recoverable; NA = Not Analyzed; ND = Not detectable above laboratory method detection limit (Chromium (VI) = 0.25 ug/L).

- 1: Perchlorate and chromium TR sampled monthly, values reported from TestAmerica.
- 2: Perchlorate, chromium TR and chromium (VI) sampled weekly, values reported from TestAmerica.
- 3: AP-5 Wash Water perchlorate data is also included in the GW-11 Effluent/ FBR Influent totals.
- 4: Flow weighted average concentration based on mass flow meter readings.
- 5: Sum of daily average flow for individual wells.
- 6: All concentrations reported are monthly flow weighted averages.
- 7: ND analytical values are treated as zero values in the flow weighted average calculations.

Nevada Environmental Res	Nevada Environmental Response Trust Groundwater Extraction and Treatment System Monthly Stakeholder Metrics										
Location ID	Perchlorate (lbs/month) ³	Chromium (TR) (lbs/month) ³	Chromium (VI) (lbs/month) ³								
SWF Total Extraction	2,273	0.43	0.44								
AWF Total Extraction	13,209	28	30								
IWF Total Extraction	10,887	155	162								
AP Area Total Extraction	2,885	0.23	0.21								
GWTP Effluent	13,157	5.6	ND								
GW-11 Influent	130	0.92	0.05								
FBR Influent ¹	39,730	7.9	6.0								
T-205 Effluent (AP-5 Wash Water) ¹²	10,292	NA	NA								

Notes:

TR = Total Recoverable; NA = Not Analyzed.

^{1:} AP-5 Wash Water perchlorate data is also included in the GW-11 Effluent/ FBR Influent totals.

^{2:} AP-5 Wash Water concentrations and mass flux are estimates based on mass flow meter readings.

^{3:} Total mass extracted is calculated from flow weighted average concentration and average flow (see Table 1).

Figures

Operational Metrics

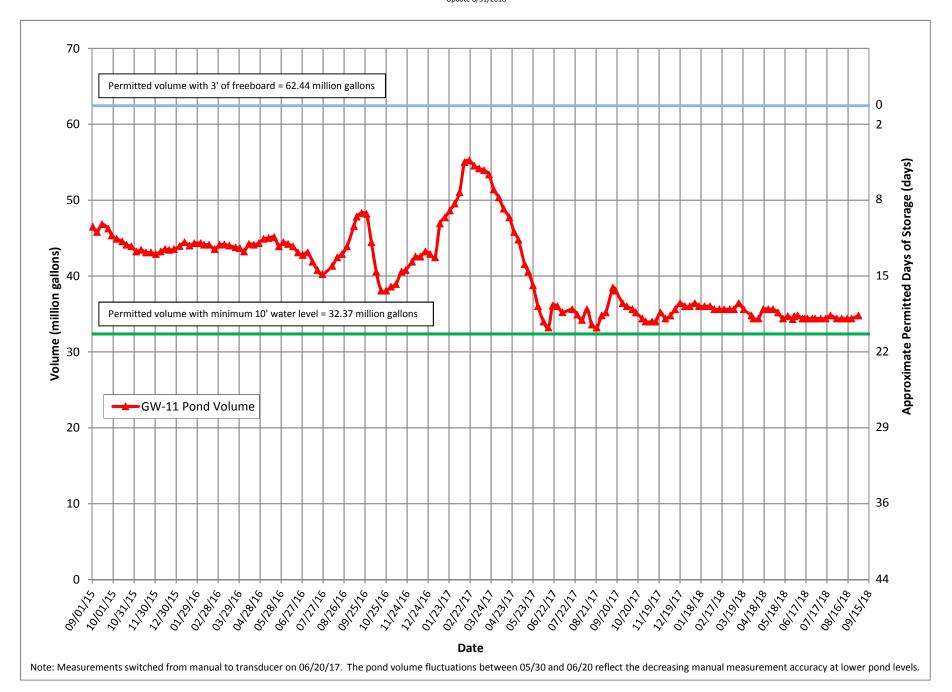
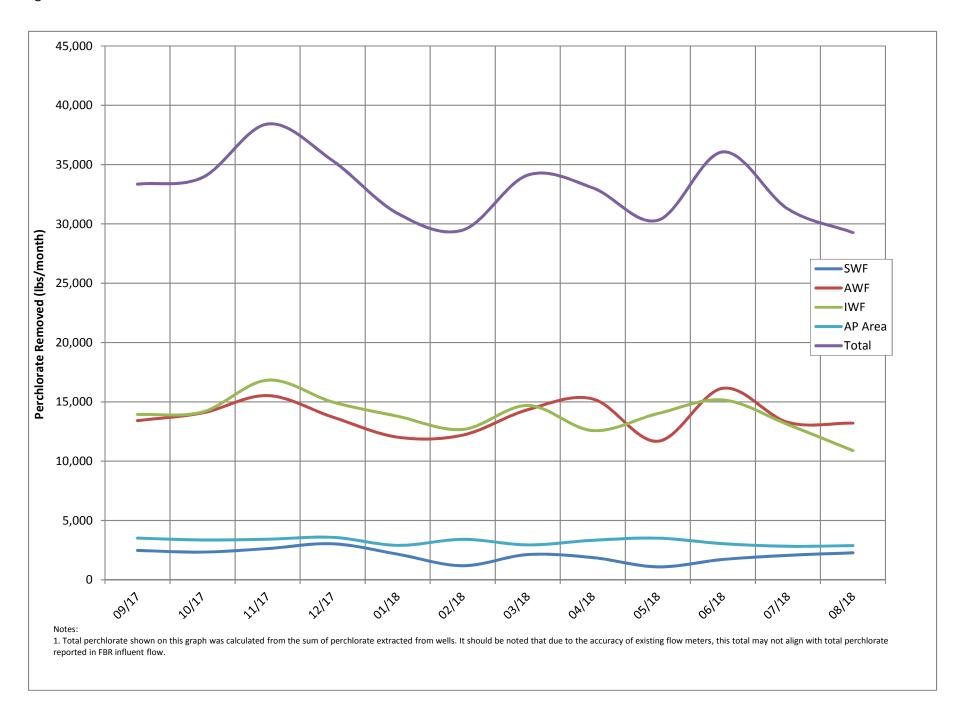


Figure 2 - Historical Perchlorate Mass Removed From Environment



Attachment A

NPDES Tracking Sheet (Prepared by ENVIRON)

NPDES Permit NV0023060 - Analytes with Numerical Discharge Limits

WORKING TRACKING SPREADSHEET
DRAFT - NOT TO BE SUBMITTED TO AGENCY

										Treated	d Effluent at Outfa	II 001													
T. Control of the Con	Contir	nuous	Daily Samples, con	nposited weekly							Weekly Grab Sar	mples				Wee	kly, collected	d separately	Quarterl						
	Flow	Rate	Perchlorate		Perchlorate		Perchlorate		Perchlorate		ŧ	рН		ent Total Im Chromium	Manganese	Total Iron	Total Inorganic Nitrogen (TIN)	Total Suspended Solids (TSS)		Total Ammonia as N	Total Phosphorus as P	BOD ₅ (inhibited)		pited)	Total Dissolved Solids (TD:
	30-Day Avg. (MGD)	Daily Maximum (MGD)	30-Day Avg. (μg/L)	30-Day Avg. (lbs/day)	Daily Min. (S.U.)	Daily Max. (S.U.)	Daily Max. (μg/L)	Daily Max. (μg/L)	Daily Max. (μg/L)	Daily Max. (μg/L)	Daily Max. (mg/L)	Daily Average (mg/L)	-	30-Day Avg. (lbs/day)	30-Day Avg. (lbs/day)	30-Day		30-Day Avg. (lbs/day)	Daily Max. (mg/L)						
	2.52	2.88	18	0.38	6.5	9.0	10	100	5,000	10,000	20	135	2,839	20*	10*	25	40	525	8,000						
nuary 2018	1.80	1.88	0.5	0.0075	6.70	7.02	0.49	18	600	3,900	14	17	260	170	1.9	2.:	3.9	45							
bruary 2018	1.83	1.88	1.5	0.022	6.81	6.87	ND (<0.25)	8.2	590	2,300	12	16	230	150	1.5	2.	4.0	43	4,600						
arch 2018	1.79	1.89	0.5	0.0075	6.76	7.19	ND (<0.25)	15	430	2,600	10	13	200	50	2.6	2.	3 4.1	43							
oril 2018	1.68	1.81	0.5	0.0070	6.60	7.30	ND (<0.25)	8.7	380	1,100	0.89	9	130	3	2.3	1.	2.7	27							
ay 2018	1.69	1.85	0.8	0.012	6.89	7.00	ND (<0.25)	9.4	370	2,400	1.6	10	140	3.2	2.2	1.	2.2	19	4,000						
ne 2018	1.69	1.94	4	0.058	6.61	6.98	ND (<0.25)	9.0	370	230	1.4	8	110	8	2.1	1.	3.0	24							
ly 2018	1.65	1.86	0.5	0.0069	6.70	7.0	1.6	4.0	420	1,300	0.83	6.9	100	3.5	1.3	1.	5 2.1	19							
igust 2018 (month to date)	1.67	1.85	0.5	0.0069	6.60	6.76	ND (<0.25)	2.8	370	1,300	1.6	9	120	2.5	2.5	1.	2.1	24	4,500						
otember 2018 (month to date)	1.43	1.85	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	N/	NA NA	NA	·						

Daily Grab	Composite		μg/L	lbs/day	Sample Date	S.U.	μg/L	μg/L	μg/L	μg/L	mg/L	mg/L	lbs/day	mg/l	L	lbs/day		mg/L	lbs/dav	Sample Date	mg/L	lbs/day	Sample Date	mg/L
Sample Dates	Sample Date																			,			Jampie Jate	8/ =
12/31 - 1/6	1/6/2018	ND (<1.0)	0.5	0.0077	1/2/2018	7.02	ND (<0.25)	6.6	600	1,600	14	12	185		12	183**		0.082	1.3	1/3/2018	2.2	33		
1/7 - 1/13	1/13/2018	ND (<1.0)	0.5	0.0072	1/8/2018	6.86	ND (<0.25)	4.8	600	2,800	11	18	263		11	160		0.13	1.9	1/10/2018	3.2	48		
1/14 - 1/20	1/20/2018	ND (<1.0)	0.5	0.0076	1/15/2018	6.70	0.25	5.7	550	1,100	11	7.9	122		10	142**		0.11	1.7	1/17/2018	3.9	58		
1/21 - 1/27	1/27/2018	ND (<1.0)	0.5	0.0076	1/22/2018	6.83	0.49	18	530	3,900	12	26	401		11	170**		0.18	2.8	1/24/2018	2.3	36		
1/29 - 2/3	2/3/2018	ND (<1.0)	0.5	0.0077	1/29/2018	6.72	ND (<0.25)	11	580	3,800	9.8	21	316		8.9	134		0.11	1.7	1/31/2018	3.1	47		
2/4 - 2/10	2/10/2018	ND (<1.0)	0.5	0.0076	2/5/2018	6.87	ND (<0.25)	5.4	580	960	12	6.9	104		9.9	150**		0.047	0.71	2/7/2018	2.6	40	2/5/2018	4,600
2/11 - 2/17	2/17/2018	3.1	3.1	0.048	2/12/2018	6.81	ND (<0.25)	6.8	590	1,300	12	7.0	106		10	151		0.0555	0.840	2/14/2018	2.3	35		
2/18 - 2/24	2/24/2018	ND (<1.0)	0.5	0.0077	2/19/2018	6.86	ND (<0.25)	7.0	550	2,300	12	16	240		10	150		0.11	1.7	2/21/2018	2.8	43		
2/25 - 3/3	3/3/2018	1.7	1.7	0.024	2/26/2018	6.84	ND (<0.25)	8.2	550	1,700	12	33	481		6.9	101		0.19	2.8	2/28/2018	4.0	55		
3/4 - 3/10	3/10/2018	ND (<1.0)	0.5	0.0073	3/5/2018	6.96	ND (<0.25)	11	430	2,600	9.8	18	269		8.3	124		0.24	3.6	3/7/2018	4.1	60		
3/11 - 3/17	3/17/2018	ND (<1.0)	0.5	0.0076	3/12/2018	6.76	ND (<0.25)	7.1	360	2,100	10	17	258		8.6	130**		0.22	3.3	3/14/2018	3.7	58		
3/18 - 3/24	3/24/2018	ND (<1.0)	0.5	0.0075	3/19/2018	7.14	ND (<0.25)	15	290	2,300	ND (<0.50)	12	175		0.39	5.7		0.11	1.6	3/21/2018	2.5	38		
3/25 - 3/31	3/31/2018	ND (<1.0)	0.5	0.0076	3/26/2018	7.19	ND (<0.25)	3.6	340	890	ND (<0.50)	5.9	90		0.45	6.0		0.13	2.0	3/28/2018	0.95	14		
4/1 - 4/7	4/7/2018	ND (<1.0)	0.5	0.0073	4/2/2018	7.30	ND (<0.25)	5.2	150	1,100	0.75	21	313		0.75	11		0.29	4.3	4/4/2018	1.7	25		
4/8 - 4/14	4/14/2018	ND (<1.0)	0.5	0.0066	4/9/2018	6.74	ND (<0.25)	4.1	300	1,100	0.89	7.4	100		0.14	1.9**		0.17	2.3	4/11/2018	2.2	31		
4/15 - 4/21	4/21/2018	ND (<1.0)	0.5	0.0070	4/16/2018	6.60	ND (<0.25)	8.7	380	560	ND (<0.50)	3.3	44		0.18	2.4		0.14	1.9	4/18/2018	2.7	37		
4/22 - 4/28	4/28/2018	ND (<1.0)	0.5	0.0070	4/23/2018	6.91	ND (<0.25)	5.3	290	480	ND (<0.50)	6.1	89	ND (<0.10)	0.050	0.73		0.16	2.3	4/25/2018	0.90	13		
4/29 - 5/5	5/5/2018	2.0	2.0	0.030	4/30/2018	6.97	ND (<0.25)	5.1	300	1,000	ND (<0.50)	5.6	80		0.19	2.7		0.057	0.82	5/2/2018	2.0	30	5/1/2018	4,000
5/6 - 5/12	5/12/2018	ND (<1.0)	0.5	0.0072	5/7/2018	7.00	ND (<0.25)	8.0	360	2,300	1.6	13	157		0.53	8.1**		0.37	4.5	5/9/2018	2.2	34		
5/13 - 5/19	5/19/2018	ND (<1.0)	0.5	0.0069	5/14/2018	6.89	ND (<0.25)	7.6	280	2,400	ND (<0.50)	13	192		0.11	1.6**		0.11	1.6	5/16/2018	1.1	13		
5/20 - 5/26	5/26/2018	ND (<1.0)	0.5	0.0069	5/21/2018	6.94	ND (<0.25)	9.4	350	1,700	ND (<0.50)	12	177	ND (<0.10)	0.050	0.74**		0.086	1.3	5/23/2018	1.2	15		
5/27 - 6/2	6/2/2018	ND (<1.0)	0.5	0.0071	5/29/2018	6.98	ND (<0.25)	ND(<2.5)	370	100	1.1	2.3	28		0.33	4.0**		0.13	1.6	5/30/2018 NI	D (<0.50) 0.25	3.8		
6/3 - 6/9	6/9/2018	14**	14	0.21	6/4/2018	6.98	ND (<0.25)	4.6	320	81	ND (<0.50)	6.5	104	ND (<0.10)	0.050	0.80++		0.14	2.2	6/6/2018	3.0	48		
6/10 - 6/16	6/16/2018	ND (<1.0)	0.5	0.0069	6/11/2018	6.89	ND (<0.25)	5.4	370	96	0.85	7.2	105		0.11	1.6**		0.16	2.3	6/13/2018	1.9	22		
6/17 - 6/23	6/23/2018	ND (<1.0)	0.5	0.0068	6/18/2018	6.61	ND (<0.25)	9.0	360	230	1.4	14	162		1.4	16**		0.17	2.0	6/20/2018	0.83	11		
6/24 - 6/30	6/30/2018	ND (<1.0)	0.5	0.0067	6/25/2018	6.76	ND (<0.25)	4.4	310	95	ND (<0.50)	4.0	58	ND (<0.10)	0.050	0.73**		0.13	1.9	6/27/2018	1.1	16		
7/1 - 7/7	7/7/2018	ND (<1.0)	0.5	0.0070	7/2/2018	6.89	ND (<0.25)	4.0	340	91	ND (<0.50)	5.2	76		0.11	1.6		0.14	2.1	7/5/2018	1.6	19		
7/8 - 7/14	7/14/2018	ND (<1.0)	0.5	0.0069	7/9/2018	6.81	ND (<0.25)	2.8	380	520	ND (<0.50)	4.1	61		0.27	4.0**		0.096	1.4	7/11/2018	2.1	26		
7/15 - 7/21	7/21/2018	ND (<1.0)	0.5	0.0066	7/16/2018	7.0	ND (<0.25)	3.6	320	850	ND (<0.50)	6.6	75		0.22	2.5**		0.052	0.59	7/18/2018	1.1	17		
7/22 - 7/28	7/28/2018	ND (<1.0)	0.5	0.0071	7/23/2018	6.83	ND (<0.25)	3.9	340	940	0.83	9.0	133		0.19	2.8**		0.072	1.1	7/25/2018	1.5	13		
7/29 - 8/4	8/4/2018	ND (<1.0)	0.5	0.0071	7/30/2018	6.70	1.6	3.5	420	1,300	ND (<0.50)	9.4	146		0.12	1.9		0.072	1.1	8/1/2018	2.1	31	8/6/2018	4,500
8/5 - 8/11	8/11/2018	ND (<1.0)	0.5	0.0066	8/6/2018	6.64	ND (<0.25)	ND (<2.5)	330	1,100	ND (<0.50)	9.0	108		0.30	3.6**		0.025	0.30	8/8/2018	1.8	22	'-'	,
8/12 - 8/18	8/18/2018	ND (<1.0)	0.5	0.0070	8/13/2018	6.63	ND (<0.25)	ND(<2.5)	350	1,200	1.0	7.1	104		0.21	3.1**		0.068	0.99	8/15/2018	1.8	23		
8/19 - 8/25	8/25/2018	ND (<1.0)	0.5	0.0069	8/20/2018	6.60	ND (<0.25)	2.8	370	1,300	1.2	8.4	124		0.17	2.5**		0.52	7.7	8/22/2018	1.9	21		
1 ' '		NA NA	NA	NA	8/27/2018	6.76	ND (<0.25)	2.5	370	1,100	1.6	11	130		0.55			0.091						
8/26 - 9/1	9/1/2018	INA	INA	INA	9/4/2018	NA	ND (<0.25) NA	NA	NA	1,100 NA	NA	NA	NA	NA	NA	6.5 ⁺⁺ NA	NA	0.091 NA	1.1 NA	8/29/2018 9/5/2018	NA NA	NA NA		
I		I			9/4/2018	INA	INA	INA	INA	NA	NA	NA	INA	NA	INA	NA	INA	NA	INA	3/3/2018	INA	NA		

Note: All analytical responsibilities are performed by TestAmerica Laboratories, Inc. (TestAmerica) in Irvine, California, unless otherwise indicated.

NA = Not Available To Date

ND = Not Detected above laboratory reporting limit; concentration in adjacent cell to right is one-half the reporting limit (per Permit condition)

Last Updated: September 7, 2018

^{**} Additional samples were collected and analyzed for ammonia during this week and results were included in the 30-day average loading calculation.

J = Result is less than the reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value.

^{-- =} Analyte detected; see column adjacent to right

^{*} Total phosphorus discharge limitation of 10 lbs/day applies between March 1 and October 31; Ammonia discharge limitation of 20 lbs/day applies between April 1 and September 30; no limits apply the rest of the year.

^{**} Following an initial detection of 27 µg/L of perchlorate in the 7-day composite sample, a second 7-day composite sample for this period was analyzed for perchlorate, as well as all 7 individual daily samples. The second 7-day composite sample, as well as all individual daily samples, were ND (<2.5 µg/L) for perchlorate. The listed concentration is the average of the two 7-day composite samples (27 µg/L and half the detection limit [1.25 µg/L]).

Attachment B

Equipment Tracking Form

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
		Main Plant Equipment				
1		Seep Wells and Lift Station 1				
1.01		Seep Well Field, 9 wells	Running			
1.02		Lift Station 1 Lift Pump A	Running			
1.03		Lift Station 1 Lift Pump B	Standby			
1.04		Area in and around Lift Station 1	Running		4	Installed a vent on the MCC to help cool the cabinet
2		Athens Road Wells and Lift Station 3				
2.01		Athens Road Well Field, 9 wells	Running		3	The new mag meter was installed on ART-4
2.02		Lift Station 3 Lift Pump A				
2.03		Lift Station 3 Lift Pump B				
2.04		Area in and around Lift Station 3	Running			
3		Lift Station 2 and Transmission Pipelines				
3.01		Influent Pipeline				
3.02		Effluent Pipeline	_			
3.03		Lift Station 2 Lift Pump A				
3.04		Lift Station 2 Lift Pump B				
3.05		Area in and around Lift Station 2	Running		3	Installed a new blower on the A/C unit for the VFD cabinet.
4		Interceptor Wells and Cr Treatment Plant				
4.01		IWF Well Field, 30 wells	=		2	I-Q was re-installed. New discharge fittings were installed on I-AD.
4.02		Ferrous Sulfate Feed System				
4.03		Polymer Feed System	Running			
4.04		Clarifier	In operation			
4.05		Filter Press				
4.06		GWTP Effluent Tank				
4.07		Interceptor Booster Pump A				
4.08		Interceptor Booster Pump B	Standby			
4.09		Area In And Around GWTP	Running		2	While the power was taken down, a new UPS was installed in the MCC for backup for the PLC rack
5		Equalization Area and GW-11 Pond				
5.01	PID10A	Pond GW-11				
5.02	PID10A	Pond Water Pump - P101A				
5.03	PID10A	Pond Water Pump - P101B	· · · · · · · · · · · · · · · · · · ·			
5.04	PID10A	Equalization Tanks	In operation			
5.05	PID10A	Area in and Around EQ	In operation			
5.06	PID10A	Raw Water Feed Pump - P102A				

Status Codes

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Maintenance - Out of service for maintenance

Off - Not currently needed for use, but can be placed in service

- 1= Critical Cannot continue with operation until repairs made
- 2 = Important Can still operate safely and in compliance with permits, but risks are increased
- 3 = Moderate Work needs to be performed, but plant can still operate with redundancy that is in place
- 4 = Low Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
5.07	PID10A	Raw Water Feed Pump - P102B				
5.08	PID10A	F-101 Filters	Running			
5.09	PID10B	Carbon Absorber - LGAC 201A	Running		4	A new pressure gauge was installed on the inlet side of the GAC's
5.10	PID10B	Carbon Absorber - LGAC 201B				
5.11	PID10B	Carbon Absorber - LGAC 201C	Running			
6		First Stage FBRs A, 1 & 2				
6.01	PID14	FBR A			3	A new bed height pump was installed
6.02	PID14	Separator Tank - 1401				
6.03	PID14	Media Return Pump - P 1401			3	The pump was replaced and a spare was assembled.
6.04	PID14	P1401A				
6.05	PID01A	P1401B				
6.06	PID01A	FBR 1	Running			
6.07	PID02A	FBR 2	Running		4	A new 1" bed height pump was installed
6.08	PID01A	First Stage Separator Tank - T2011	Running			
6.09	PID01A	Media Return Pump - P2011	Running		3	The media return pump was removed and the system was flushed. The suction disc was replaced
6.10	PID01A	First Stage FBR Pump - P1011	Standby			
6.11	PID01A	First Stage FBR Pump - P1012	Running			
6.12	PID01A	First Stage FRB Pump - P101A	Running			
6.13	PID07A	FBR A pH Feed Pump - P71A	Off			
6.14	PID07A	FBR 1 pH Feed Pump - P711	Off			
6.15	PID07A	FBR 2 pH Feed Pump - P712	Off			
6.16	PID07A	FBR A Nutrient (Urea) Feed Pump - P72A	Off			
6.17	PID07A	FBR 1 Nutrient (Urea) Feed Pump - P721	Off			
6.18	PID07A	FBR 2 Nutrient (Urea) Feed Pump - P722	Off			
6.19	PID15	FBR A Nutrient (Phos Acid) Feed Pump - P1520A	Running			
6.20	PID15	FBR 1 Nutrient (Phos Acid) Feed Pump - P1521	Running			
6.21	PID15	FBR 2 Nutrient (Phos Acid) Feed Pump - P1522	Running			
6.22	PID07B	FBR A Electron Donor Assembly Pump - P73A	Running			
6.23	PID07B	FBR 1 Electron Donor Assembly Pump - P731	Running			
6.24	PID07B	FBR 2 Electron Donor Assembly Pump - P732	_			
7		First Stage FBRs 3 & 4				
7.01	PID01B	<u> </u>	Running			
7.02	PID01B	FBR 4	Running			
7.03	PID02B	First Stage Separator Tank - T2012	Running			
7.04	PID01B	Media Return Pump - P2012	Running			

Status Codes

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Maintenance - Out of service for maintenance

Off - Not currently needed for use, but can be placed in service

- 1= Critical Cannot continue with operation until repairs made
- 2 = Important Can still operate safely and in compliance with permits, but risks are increased
- 3 = Moderate Work needs to be performed, but plant can still operate with redundancy that is in place
- 4 = Low Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
7.05	PID01B	First Stage FBR Pump - P1013	Running			
7.06	PID01B	First Stage FRB Pump - P1014	Running			
7.07	PID01B	First Stage FBR Pump - P102A	Running			
7.08	PID07A	FBR 3 pH Feed Pump - P713	Running			
7.09	PID07A	FBR 4 pH Feed Pump - P714	Running			
7.10	PID07A	FBR 3 Nutrient (Urea) Feed Pump - P723				
7.11	PID07A	FBR 4 Nutrient (Urea) Feed Pump - P 724	Off			
7.12	PID15	FBR 3 Nutrient (Phos Acid) Feed Pump - P1523	Running			
7.13	PID15	FBR 4 Nutrient (Phos Acid) Feed Pump - P1524	Running			
7.14	PID07B	FBR 3 Electron Donor Assembly Pump - P733	Running			
7.15	PID07B	FBR 4 Electron Donor Assembly Pump - P734	Running			
8		Second Stage FBRs 5 & 6				
8.01	PID03A	FBR 5	Running		1	The discharge piping was replaced. The old flange ring was cracked.
8.02	PID03A	FBR 6	Running			
8.03	PID03C	Second Stage Separator Tank - T3011	Running			
8.04	PID03A	Media Return Pump - P3011	Running			
8.05	PID03A	Second Stage FBR Pump - P3015	Running			
8.06	PID03A	Second Stage FBR Pump - P3016	Standby			
8.07	PID03A	Second Stage FBR Pump - P301A				
8.08	PID07A	FBR 5 pH Feed Pump - P715				
8.09	PID07A	FBR 6 pH Feed Pump - P716				
8.1	PID07A	FBR 5 Nutrient (Urea) Feed Pump - P725				
8.11	PID07A	FBR 6 Nutrient (Urea) Feed Pump - P726				
8.12	PID07B	FBR 5 Electron Donor Assembly Pump - P735				
8.13	PID07B	FBR 6 Electron Donor Assembly Pump - P736	Running			
9.01	PID03B	Second Stage FBRs 7 & 8	Running			
9.01	PID03B		Running			
9.03	PID03D	Second Stage Separator Tank - T3012	•			
9.03	PID03B	Media Return Pump - P3012				
9.05	PID03B	Second Stage FBR Pump - P3017				
9.06	PID03B	Second Stage FBR Pump - P3018				
9.07	PID03B	Second Stage FBR Pump - P302A	•			
9.08	PID07A	FBR 7 pH Feed Pump - P717				
9.09	PID07A	FBR 8 pH Feed Pump - P718				
9.10	PID07A	FBR 7 Nutrient (Urea) Feed Pump - P727				

Status Codes

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Maintenance - Out of service for maintenance

Off - Not currently needed for use, but can be placed in service

- 1= Critical Cannot continue with operation until repairs made
- 2 = Important Can still operate safely and in compliance with permits, but risks are increased
- 3 = Moderate Work needs to be performed, but plant can still operate with redundancy that is in place
- 4 = Low Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
9.11	PID07A	FBR 8 Nutrient (Urea) Feed Pump - P728	Off			
9.12	PID07B	FBR 7 Electron Donor Assembly Pump - P737	Running			
9.13	PID07B	FBR 8 Electron Donor Assembly Pump - P738	Running			
10		Aeration and DAF System				
10.01	PID04	Aeration Tank	In operation			
10.02	PID04	Aeration Blower - B401	Running			
10.03	PID04	Bio filter	In operation			
10.04	PID04	Nutrient Solution	Running			
10.05	PID04	Bio filter Sump				
10.06	PID04	Nutrient Pump - P401	Running			
10.07	PID04	Bio filter Sump Pump - P402A	Standby			
10.09	PID04	Bio filter Blower	Running			
10.10	PID05	DAF Pressure Tanks	In operation			
10.11	PID05	DAF Vessel - D501	Running			
10.12	PID05	DAF Pressure Pump - P501	Running			
10.13	PID05	DAF Float Pump - P502	Running			
10.14	PID05	DAF Vessel - D551	Running		3	Welded a patch repair on the sludge box
10.15	PID05	DAF Pressure Pump - P551	Running			
10.16	PID05	DAF Float Pump - P552	Running			
10.17	PID05	Screw Conveyer Drive	Standby			
10.18	PID05	Skimmer Drive	Running			
11		Pumping System (Old Effluent)				
11.01	PID06	Effluent Tank 601	In operation			
11.02	PID06	Effluent Pump - P601	Running			
11.03	PID06	Effluent Pump - P602	Standby			
12		Sand Filter System				
12.01	PID17	Sand Filter				
12.02	PID17	Filter Reject Tank				
12.03	PID17	Filter Reject Pump - P1701A	Standby			
12.04	PID17	Filter Reject Pump - P1701B	Running			
13		Effluent Tank and Pumping				
13.01	PID10C		Ü			
13.02	PID10C					
13.03	PID10C					
13.04	PID10C		Running			
14		Solids Collection and Pressing System				
14.01	PID16	Sludge Storage Tank	In operation			

Status Codes

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Maintenance - Out of service for maintenance

Off - Not currently needed for use, but can be placed in service

- 1= Critical Cannot continue with operation until repairs made
- 2 = Important Can still operate safely and in compliance with permits, but risks are increased
- 3 = Moderate Work needs to be performed, but plant can still operate with redundancy that is in place
- 4 = Low Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
14.02	PID16	Solids Storage Effluent Pump - P1601	Running			
14.03	PID16	Solids Cond. Tank	In operation		3	The valves were actuated and the stems were removed to improve their function
14.04	PID09	Sludge Mixer	Running			
14.05	PID09	Filter Press Pump - P901	Running			
14.06	PID09	Filter Press Pump - P902				
14.07	PID09	West Press	Standby			
14.08	PID09	East Press	Running			
14.09	PID09	Filtrate Tank	In operation			
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running			
		Chemical Systems				
15		Electron Donor System				
15.01	PID07B	Electron Donor Tank	In operation			
15.02	PID07B	Booster Pump P739A	Running			
15.03	PID07B	Booster Pump P739B	Standby			
17	PID07C	Micro Nutrient System	In operation			
18	PID07C	Hydrogen Peroxide System	In operation			
19	PID07C	De-Foam System	In operation			
20	PID15	Nutrient (Phosphoric Acid) System (Tank only - pumps included in FBRs)	In operation			
21	PID07A	Nutrient (Urea) System (Tank only - pumps included in FBRs)	In operation			
22	PID07A	pH System (Tank and effluent pH feed pump only - other pumps included in FBRs)	·			
23	PID07C	Ferric Chloride System	In operation			
24	PID07B	Polymer Systems - DAF				
25	PID09	Polymer System - Solids Dewatering (2 tanks, 2 centrifugal pumps, mixer, volumetric feeder)	In operation		2	The system was taken offline to replace the coupling insert for the transfer pump
		Utility Systems				
26		Compressed Air System				
26.01	PID08	West Compressor	Running			
26.02	PID08	East Compressor	Running		2	Air Center replaced the tubing and fittings for the oil cooler
26.03	PID08	O2 Compressor				
26.04	PID08	Compressed Air Receiver Tank	In operation			
26.05	PID08	Air Dryer				
26.06	PID08	Oil Removal Filter	In operation			

Status Codes

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Maintenance - Out of service for maintenance

Off - Not currently needed for use, but can be placed in service

1= Critical - Cannot continue with operation until repairs made

2 = Important - Can still operate safely and in compliance with permits, but risks are increased

3 = Moderate - Work needs to be performed, but plant can still operate with redundancy that is in place

4 = Low - Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
26.07	PID08	Particulate Filter	In operation			
27	PID16	Oxygen System	In operation			
28		GWETS Plant Controls/ Siemens Controls	In operation			
29		Well Control System/ Allen Bradley Controls	In operation			
30		MCC FBR Pad	In operation			
31		MCC in D-1	In operation		1	The power was taken down to complete the high voltage inspection of the electrical buckets
32		MCC in EQ area	In operation			
		Miscellaneous Systems				
33		Operations Office/Network	In operation			
34		Laboratory Analyzers	In operation			
35		Security Systems	In operation			
		Shelf Spares				
		Media Return Pump Rebuild Kit	In stock			
		pH Feed Pump	In stock			
		Nutrient Feed Pump	In stock			
		Electron Donor Feed Pump	In stock			
		Phosphoric Acid Feed Pump	In stock			Spares are on the shelf
		Interceptor Well Pumps (4 each)	In stock			
		Seep Well Pump (1 each, same as Athens so total of 2)	In stock			
		Athens Road Well Pump (1 each, same as Seep so total of 2)	In stock			Spares are on the shelf.

Status Codes

Running - Unit is in operation
Standby - Spare or duplicate, not currently in operation
Maintenance - Out of service for maintenance
Off - Not currently needed for use, but can be placed in service

- 1= Critical Cannot continue with operation until repairs made
- 2 = Important Can still operate safely and in compliance with permits, but risks are increased
- 3 = Moderate Work needs to be performed, but plant can still operate with redundancy that is in place
- 4 = Low Minor repairs that in no way alter the performance of the plant