
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: December 20, 2020

Subject: NERT – GWETS Operation Monthly Report – November 2020

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 November 2020.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in November 2020. 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 182 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 1,037 gpm during November 2020. At the end of the month, the GW-11 Pond volume was at 34.4 million gallons (MG), which would allow 19.5 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 decreased by 0.4 MG from the end of October 2020. 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 0.12 mg/L for the month. The influent perchlorate concentration to the FBR plant averaged 56 mg/L for the month, with a maximum concentration of 62 mg/L. In comparison, the influent perchlorate concentration to the FBRs for the month of October 2020 averaged 64 mg/L, with a maximum concentration of 77 mg/L.

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. 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 no operational issues with GW-11 in the month of November.

2. Biological Plant

There were influent / effluent diversions during the reporting period generally associated with GW-11 pond level maintenance as well as extraction well short-term shutdown events. Below is a description of the events that occurred:

Diversion Events / Well Shutdowns

- Well Shutdown of Interceptor well I-Q occurred on November 1, 2020 from 10:35am to November 2, 2020 8:50am due to a malfunctioning pump motor. Maintenance was completed, the motor was replaced, and the well was brought back online.
- Well Shutdown of Interceptor well I-T occurred on November 16, 2020 from 1:57pm to 7:24pm due to a malfunctioning pump motor. Maintenance was completed, the motor was replaced, and the well was brought back online.
- Effluent diversion to GW-11 occurred on November 25, 2020 from 11:36am to November 26 2020 5:22am due to low GW-11 pond level. Approximately 351,000 gallons of water were diverted to GW-11.
- Effluent diversion to GW-11 occurred on November 30, 2020 from 11:30pm to November 31, 2020 5:34am due to low GW-11 pond level. Approximately 378,000 gallons of water were diverted to GW-11.

3. Spills

There were no reportable spills in the month of November.

4. Maintenance

- Major maintenance performed by ETI in the reporting month included:
 - I. Installed a suction spool piece for P-1014 FBR 4 recycle pump.
 - II. Rebuilt the bed height pump on FBR 4.
 - III. Replaced the trunnions on separator 1 media return pump.
 - IV. Installed a new level transducer on PC-119.
 - V. Replaced the ½ hp motor on AP Area well E2-4 and Interceptor well I-Q.
 - VI. Replaced the charging cable on the OPS cart.
 - VII. Replaced the air ends on the press feed pump.
 - VIII. Changed out the seal water line on the Lift Station 3 east turbine pump.
 - IX. Repaired the worn caustic tank fill line. A pinhole formed on the piping.
 - X. Repaired the skimmer system on the North DAF.

- Preventative Maintenance completed or being performed by ETI in the reporting month included:
 - I. Changed the packing on the south turbine at Lift Station 1.
 - II. Changed the oil on the Lift Station 2 east turbine.
 - III. Cleaned out the solids from the sand filter reject tank.
 - IV. Inspected and tightened the connections in the MCC at Lift Station 1.
 - V. Cleaned the air filters on the external Air Conditioning units at Lift Station 3.
 - VI. The changed the oil on the Aeration blower gearbox.
 - VII. Cleaned out the piping on the feed line of FBR 4.
 - VIII. Tested and verified the flow on the FBR feed lines.
 - IX. Wrapped insulation on the tubing and piping around the plant to keep from freezing.
 - X. Cleaned and calibrated the level sensor on the dry polymer system.

GWETS Upgrades and Facility Projects

Unit 4 Chromium Water Treatment Plant – Envirogen received comments regarding the deliverable documents that were submitted to the Trust in July 2019 for this project. The revised documents dealing with the Controls Specification, Process Drawings, and Mechanical Details were re-submitted to the Trust in September. Envirogen is awaiting further direction from the Trust regarding this matter. The Trust has advised Envirogen that this project is on hold pending finalization and approval of the forthcoming Unit 4 Source Area In-Situ Bioremediation Work Plan.

GWETS Extension–The signed Work Authorization for engineering and fabrication of the GWETS Extension was returned to the Trust on January 28, 2020. Orders were placed for the major equipment for the GWETS Extension earlier this year, and several deliveries have been made with the balance of equipment delayed due to COVID-19 and expected to be received by February 2021. Envirogen is currently awaiting Trust comment on the O&M Work Authorization proposal for the GWETS Extension.

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 Response Trust Groundwater Extraction and Treatment System Monthly Stakeholder Metrics				
Location ID	Average Flow Rate (gpm)	Perchlorate (mg/L) ^{4 5}	Chromium (TR) (mg/L) ^{4 5}	Chromium(VI) (mg/L) ^{4 5}
SWF Total Extraction ¹	743 ³	8.4	0.0019	0.0025
AWF Total Extraction ¹	473 ³	63	0.14	0.13
IWF Total Extraction ¹	61 ³	494	6.1	6.3
AP Area Total Extraction ¹	8.8 ³	848	0.15	0.15
GWTP Effluent ²	62	498	0.26	ND
GW-11 Influent ¹	0.1	69	0.06	0.044
FBR Influent ²	1,037	56	0.023	0.021

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 Eurofins TestAmerica.

2: Perchlorate, chromium TR, and chromium (VI) sampled weekly, values reported from Eurofins TestAmerica.

3: Sum of daily average flow for individual wells.

4: All concentrations reported are monthly flow weighted averages.

5: ND analytical values are treated as zero values in the flow weighted average calculations.

Nevada Environmental Response Trust Groundwater Extraction and Treatment System Monthly Stakeholder Metrics			
Location ID	Perchlorate (lbs/month) ¹	Chromium (TR) (lbs/month) ¹	Chromium (VI) (lbs/month) ¹
SWF Total Extraction	2,251	0.50	0.67
AWF Total Extraction	10,758	23	23
IWF Total Extraction	10,951	135	139
AP Area Total Extraction	2,694	0.48	0.49
GWTP Effluent	11,160	5.9	ND
GW-11 Influent	4	0.00	0.002
FBR Influent ¹	20,832	8.4	7.8

Notes:

TR = Total Recoverable; NA = Not Analyzed.

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

Figures

Operational Metrics

Figure 1 - GW-11 Pond Volume Through 11/30/2020

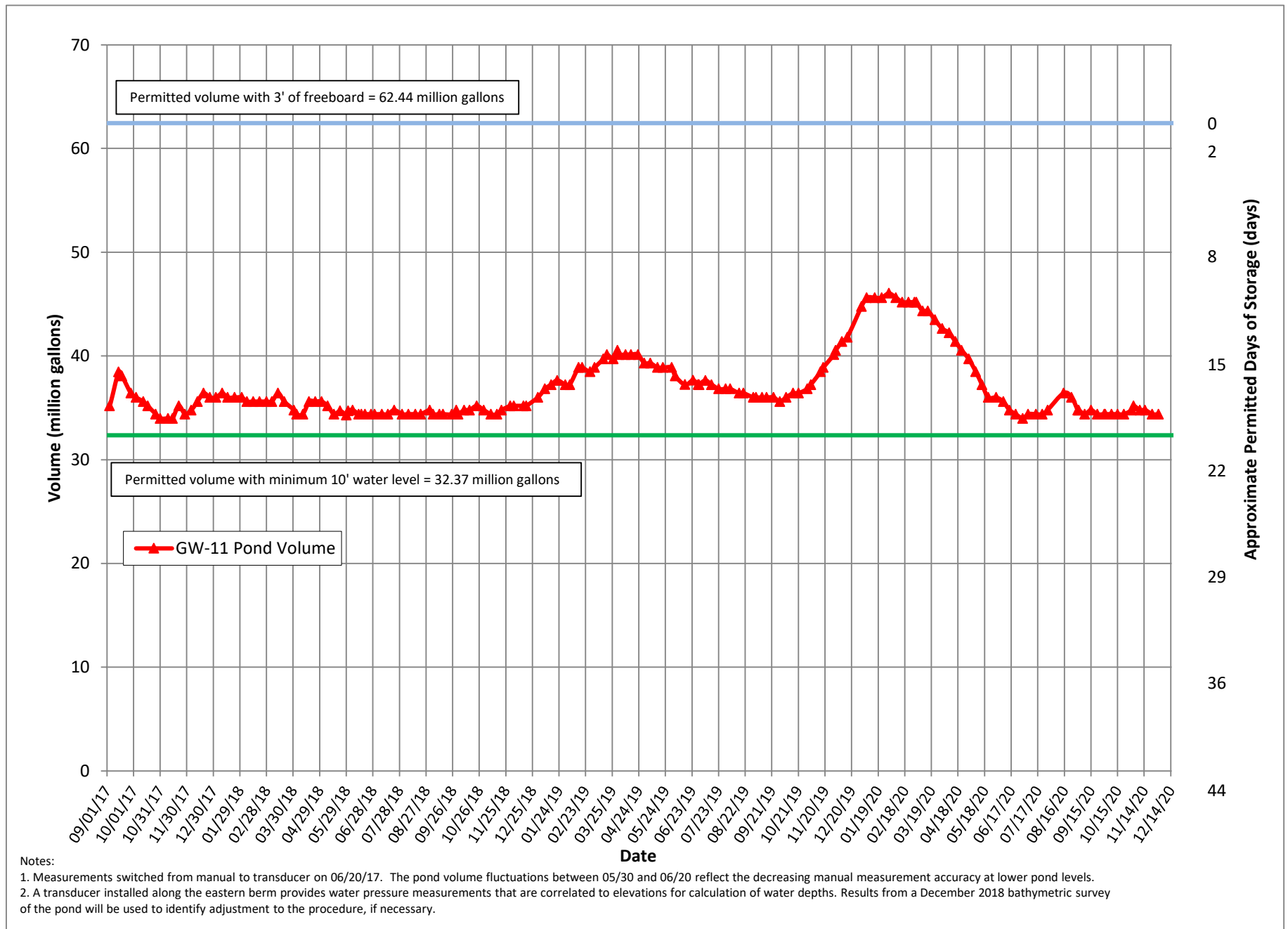
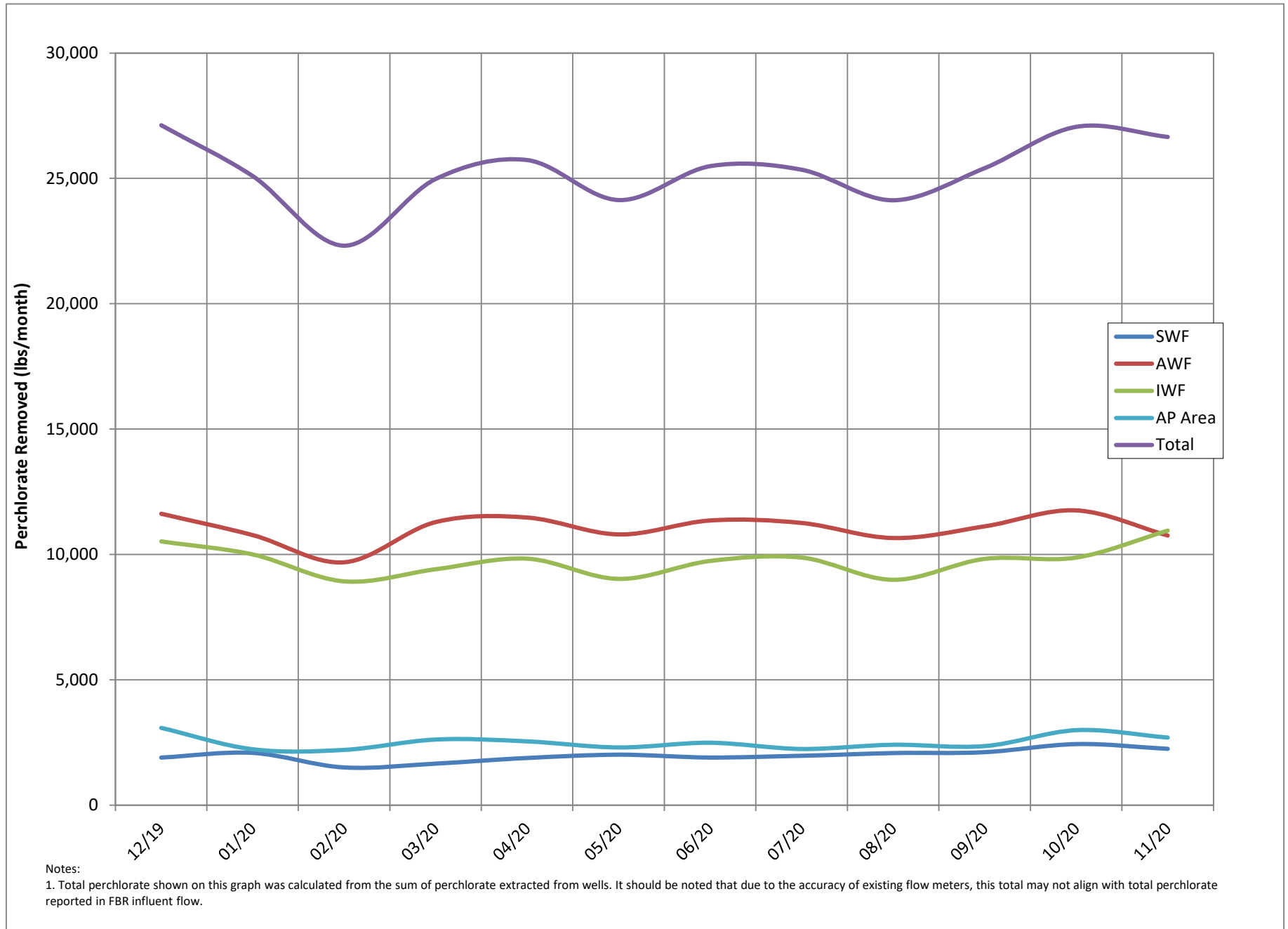


Figure 2 - Historical Perchlorate Mass Removed From Environment



Attachment A

NPDES Tracking Sheet (Prepared by Ramboll)

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		3	Drilled out the access hole on PC-119 for the level transducer. Replaced the level transducer.
1.02		Lift Station 1 Lift Pump A	Running		4	Changed the packing on the turbine.
1.03		Lift Station 1 Lift Pump B	Standby			
1.04		Area in and around Lift Station 1	Running			
2 Athens Road Wells and Lift Station 3						
2.01		Athens Road Well Field, 9 wells	Running			
2.02		Lift Station 3 Lift Pump A	Standby			
2.03		Lift Station 3 Lift Pump B	Running			
2.04		Area in and around Lift Station 3	Running			
3 Lift Station 2 and Transmission Pipelines						
3.01		Influent Pipeline	In operation			
3.02		Effluent Pipeline	Running		3	Cleaned out and inspected the CV's
3.03		Lift Station 2 Lift Pump A	Running			
3.04		Lift Station 2 Lift Pump B	Standby			
3.05		Area in and around Lift Station 2	Running			
4 Interceptor Wells and Cr Treatment Plant						
4.01		IWF Well Field, 30 wells	Running		2	Replaced the 1/2 hp motor on E2-4, I-Q,
4.02		Ferrous Sulfate Feed System	Running			
4.03		Polymer Feed System	Running		3	The tubing was replaced on the feed line. The check valve was replaced as well.
4.04		Clarifier	In operation			
4.05		Filter Press	Running		3	A new press pump was installed.
4.06		GWTP Effluent Tank	In operation			
4.07		Interceptor Booster Pump A	Running			
4.08		Interceptor Booster Pump B	Standby			
4.09		Area In And Around GWTP	Running			
5 Equalization Area and GW-11 Pond						
5.01	PID10A	Pond GW-11	In operation		3	Replaced the wiring on the SW pond corner motor electrical leads.
5.02	PID10A	Pond Water Pump - P101A	Running			
5.03	PID10A	Pond Water Pump - P101B	Standby			
5.04	PID10A	Equalization Tanks	In operation			
5.05	PID10A	Area in and Around EQ	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

Criticality Codes

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
5.06	PID10A	Raw Water Feed Pump - P102A				
5.07	PID10A	Raw Water Feed Pump - P102B				
5.08	PID10A	F-101 Filters	Running			
5.09	PID10B	Carbon Absorber - LGAC 201A	Running			
5.10	PID10B	Carbon Absorber - LGAC 201B	Running			
5.11	PID10B	Carbon Absorber - LGAC 201C	Running			
6		First Stage FBRs A, 1 & 2				
6.01	PID14	FBR A				
6.02	PID14	Separator Tank - 1401				
6.03	PID14	Media Return Pump - P 1401				
6.04	PID14	P1401A				
6.05	PID01A	P1401B				
6.06	PID01A	FBR 1	Running			
6.07	PID02A	FBR 2	Running			
6.08	PID01A	First Stage Separator Tank - T2011	Running			
6.09	PID01A	Media Return Pump - P2011	Running		3	Replaced the trunnions on the pump
6.10	PID01A	First Stage FBR Pump - P1011	Standby			
6.11	PID01A	First Stage FBR Pump - P1012				
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	Running			
7		First Stage FBRs 3 & 4				
7.01	PID01B	FBR 3	Running			
7.02	PID01B	FBR 4	Running			
7.03	PID02B	First Stage Separator Tank - T2012	Running		3	Rebuilt the bed height control pump.
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

Criticality Codes

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		2	Replaced the suction spool piping on the pump.
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			
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	Running			
8.08	PID07A	FBR 5 pH Feed Pump - P715	Off			
8.09	PID07A	FBR 6 pH Feed Pump - P716	Off			
8.1	PID07A	FBR 5 Nutrient (Urea) Feed Pump - P725	Off			
8.11	PID07A	FBR 6 Nutrient (Urea) Feed Pump - P726	Off			
8.12	PID07B	FBR 5 Electron Donor Assembly Pump - P735	Running			
8.13	PID07B	FBR 6 Electron Donor Assembly Pump - P736	Running			
9		Second Stage FBRs 7 & 8				
9.01	PID03B	FBR 7	Running			
9.02	PID03B	FBR 8	Running			
9.03	PID03D	Second Stage Separator Tank - T3012	Running			
9.04	PID03B	Media Return Pump - P3012	Running		4	The check flap was replaced on the pump.
9.05	PID03B	Second Stage FBR Pump - P3017	Running			
9.06	PID03B	Second Stage FBR Pump - P3018	Running			
9.07	PID03B	Second Stage FBR Pump - P302A	Running			
9.08	PID07A	FBR 7 pH Feed Pump - P717	Off			
9.09	PID07A	FBR 8 pH Feed Pump - P718	Off			
9.10	PID07A	FBR 7 Nutrient (Urea) Feed Pump - P727	Off			

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

Criticality Codes

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			
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		2	The North DAF was taken offline to align the skimmer system on the sprockets.
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			2	The system was bypassed to flush airlifts 1,2, and 3.
12.02	PID17	Filter Reject Tank	In operation		3	Solid were removed from the tank and sent back into the system.
12.03	PID17	Filter Reject Pump - P1701A	Standby			
12.04	PID17	Filter Reject Pump - P1701B	Running			
13		Effluent Tank and Pumping				
13.01	PID10C	UV Effluent Tank	Running			
13.02	PID10C	Effluent Booster Pump - P1302A	Running			
13.03	PID10C	Effluent Booster Pump - P1302B	Standby			

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

Criticality Codes

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
13.04	PID10C	Area Around Effluent and North D-1	Running			
14		Solids Collection and Pressing System				
14.01	PID16	Sludge Storage Tank	In operation			
14.02	PID16	Solids Storage Effluent Pump - P1601	Running			
14.03	PID16	Solids Cond. Tank	In operation			
14.04	PID09	Sludge Mixer	Running			
14.05	PID09	Filter Press Pump - P901	Running			
14.06	PID09	Filter Press Pump - P902			3	The pump was taken offline to replace the air ends of the pump.
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)	In operation			
23	PID07C	Ferric Chloride	In operation		2	A new pump head and tubing was installed on the pumping system.
24	PID07B	Polymer Systems - DAF	In operation			
25	PID09	Polymer System - Solids Dewatering (2 tanks, 2 centrifugal pumps, mixer, volumetric feeder)	In operation		3	The conditioning tote was flushed out and the level sensors were cleaned and are ready for service.
		Utility Systems				
26		Compressed Air System				
26.01	PID08	West Compressor	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

Criticality Codes

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
26.02	PID08	East Compressor	Running		3	The contactor was replaced.
26.03	PID08	O2 Compressor	Running			
26.04	PID08	Compressed Air Receiver Tank	In operation			
26.05	PID08	Air Dryer	Running			
26.06	PID08	Oil Removal Filter	In operation			
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			
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			
		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			

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

Criticality Codes

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