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**To:** Nevada Division of Environmental Protection  
Nevada Environmental Response Trust

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**Cc:** Nevada Environmental Response Trust Stakeholders

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**From:** Michael Del Vecchio, Director Engineering and Project Management

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**Date:** November 20, 2022

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**Subject:** NERT – GWETS Operation Monthly Report – October 2022

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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 October 2022.

### Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in October 2022. Flow from PC-118, PC-119, PC-120, PC-121, and PC-133 were routed to the IX system, bypassing all flow meters associated with the FBR plant for the month of October. The flow rate to the IX system averaged approximately 272 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 909 gpm during October. At the end of the month, the filled GW-11 Pond volume was at 38.1 million gallons (MG), which would allow 16.9 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 since the end of September 2022; 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 1.7 mg/L for the month. The influent perchlorate concentration to the FBR plant averaged 54 mg/L for the month, with a maximum concentration of 56 mg/L. In comparison, the influent perchlorate concentration to the FBRs for the month of September 2022 averaged 54 mg/L, with a maximum concentration of 56 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 October.

### 2. Biological Plant

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

#### Diversion Events / Well Shutdowns

- Influent diversion occurred on October 9, 2022 from 1:36pm to 2:10pm due to a malfunctioning wet well level indicator. Adjustments were made to the flow valve and the plant was brought back online. Approximately 35,000 gallons of water were added to GW-11.
- Influent diversion occurred on October 9, 2022 from 8:44pm to 9:01pm due to a malfunctioning communication card at the Equalization area. Adjustments were made to the Influent pump and the plant was brought back online. Approximately 17,000 gallons of water were added to GW-11.
- Extraction well field shutdown of the Seep Well Field (SWF) on October 12, 2022 from 12:25pm to 2:00pm due to a damaged pipe on the discharge side of the turbine pump at Lift Station 1 (LS-1). Maintenance was conducted and temporary repair was completed until a permanent replacement pipe could be constructed.
- Influent diversion occurred on October 14, 2022 from 8:05am to 8:35am due to a blown fuse in the MCC as a result of a contractor error. The fuse was identified, reset, and the plant was brought back online. Approximately 30,000 gallons of water were added to GW-11.
- Extraction well field shutdown of the Seep Well Field (SWF) on October 20, 2022 from 6:40am to 4:01pm to repair the damaged pipe on the discharge side of the turbine pump at LS-1. Maintenance was conducted and the permanent pipe replacement was installed.

### 3. IX Treatment Plant

During the month of February 2022, flooding conditions were observed adjacent to the SWF as a result of the City of Henderson's (CoH's) use of inactive Birding Ponds 10 through 13. The discharge to these ponds resulted in an increase in groundwater elevation adjacent to the SWF by approximately 5 feet. This increase in groundwater elevation caused flooding adjacent to the SWF extraction wells and within four extraction well vaults. ETI temporarily increased the pumping rate of extraction wells PC-120 and PC-121 to reduce flooding with the well vaults. Additionally, the concentration of perchlorate in shallow groundwater increased resulting in increased loading to the IX treatment plant. The CoH ceased discharging water to Birding Ponds 10 through 13 in February 2022. The groundwater elevation

adjacent to the SWF is no longer elevated but perchlorate concentrations are still elevated, although decreasing, in shallow groundwater adjacent to wells PC-118, PC-119, PC-120, and PC-121.

#### 4. Spills

There were no reportable spills in the Month of October.

#### 5. Maintenance

- Major maintenance performed by ETI in the reporting month included:
  - I. Installed a new section of piping that was damaged on the discharge of the turbines at LS-1.
  - II. Repaired a leaking combo valve.
  - III. Replaced the motor, pump, and discharge fitting on IWF extraction well I-W.
  - IV. Changed the head of the pump on the Ferrous feed at GWTP.
  - V. Rebuilt the hydraulic cylinder for the GWTP filter press.
  - VI. Replaced the high-pressure relief valve on the air compressor at the GWTP.
  - VII. Replaced the leads on the NE pond corner pump.
  - VIII. Replaced the breaker for the Influent pump and numerous breakers after a lightning strike at the EQ Area. Also replaced the Profibus connectors.
  - IX. Installed a new pump head on the FBR-1 phosphoric acid pump.
  - X. Replaced the pump and motor on the bio-filter sump.
  - XI. Took the North DAF offline and repaired the skimmer system.
  - XII. Replaced the air ends of the sludge press pump.
  - XIII. Installed a new pump with new tubing for the DAF polymer.
  
- Preventative maintenance performed by ETI in the reporting month included:
  - I. Calibrated the turbidity meters.
  - II. Changed the oil on the LS-2 turbine.
  - III. Greased and inspected the belts on the aeration blower.

Attachment B contains a summary of all maintenance activities completed during the reporting period.

#### Facility Projects

1. Chromium Treatment Subsystem – Envirogen received a Work Authorization for this scope in February 2022. The 100 percent design for the Chromium Treatment Subsystem was submitted and approved by NDEP on May 26, 2022. With a number of supply chain delays, Envirogen is currently targeting late November 2022 to complete the final modifications required to treat groundwater extracted as part of the Unit 4 Source Area In-Situ Bioremediation Treatability Study as well as the flow currently routed to the existing Chromium Treatment Plant (i.e. GWTP) from the IWF and AP Area wells. However, the supply chain delays have not had an impact on implementation of the Unit 4 Source Area In-Situ Bioremediation Treatability Study as

groundwater extraction is less than originally anticipated and tank T-201 is only filled to approximately 25 percent of capacity. ETI prefers that tank T-201 be filled to approximately 50 percent capacity before bringing the CTS online.

2. Treatment System Extension (TSE) – Envirogen has delivered all of the contracted equipment for the GWETS extension. TSE construction and system start-up is being facilitated by Arcadis through terms with the Trust and began in December 2021. ETI will incorporate a summary of the treatment operations once the system becomes operational (anticipated to occur in 1Q 2023).
3. Facility Repair/Replacement Items – Envirogen and the Trust have finalized a list of facility items to be addressed in connection with Amendment 8 to the O&M Agreement. Attachment C contains a status summary prepared by the Trust of all agreed upon items. Specific details on in-progress items are provided below:
  - I. (WA 21-02) East Air Compressor - Complete
  - II. (WA 21-03) Wiring at Lift Station 3
    1. The A/C units were installed and project is complete.
  - III. (WA 21-04) Motor Control Center at Lift Station 1
    1. Work started but delayed due to flooding at the SWF, also impacting Lift Station 1. MCC & major equipment has been delivered. Work to resume in November 2022.
  - IV. (WA 21-05) Replacement of Safety Shower System
    1. Installation is complete.
  - V. (WA 21-06) Influent Pipeline Combination Valves
    1. Work started but delayed due to flooding at the SWF (couldn't turn off well field with the elevated groundwater levels). Work to resume in November 2022.
  - VI. (WA 21-07) Replacement of all pH and ORP probes.
    1. Authorization received from the Trust. Delayed due to supply chain issues. Estimated completion by December 2022.
  - VII. (WA 21-08) Wiring IWF wells
    1. New wire has been installed at the wells, awaiting new starters to be delivered. Due to supply chain issues, some of the required electrical items are delayed. Installation to occur during the December plant shut down.
  - VIII. (WA 21-09) Siemens controls upgrade
    1. Spare parts still being received. Due to supply chain delays the HMI for the on-pad system is delayed. Estimated completion by the end of December.
  - IX. (WA 22-01) DAF Pilot
    1. Pilot is complete and the report is under Trust review.
  - X. (WA 22-02) Sludge Pump and Bins

1. Bins have arrived and the work is completed.
  - XI. (WA 22-03) Influent and Effluent Pump Motors
    1. Equipment is on order. Deliveries have begun.
  - XII. (WA 22-04) FBR Skid Upgrades
    1. Equipment is on order. Deliveries have begun.
  - XIII. (WA 22-05) Large Valve Upgrades
    1. Equipment is on order. Deliveries have begun.
  - XIV. (WA 22-07) LS2 Pump Replacement
    1. Equipment is on order. Awaiting delivery.
4. Improved Biological Treatment Plant Efficiency – Consistent with Attachment D to the December 2021 GWETS Operation Monthly Report, Envirogen plans to take five FBRs out of service and maintain them in working condition should they be needed in the future. This action will reduce the use of electricity and water and still maintain sufficient treatment capacity to address current groundwater extracted from the IWF, AWF, and the SWF as well as groundwater to be extracted as part of the Unit 4 Source Area In-Situ Bioremediation Treatability Study. FBR A was placed into Offline mode on April 13, 2022. The electrical and mechanical components of the pump skid were inspected and removed when applicable. The removal of the sand media is complete. Final inspection of all internal components is also complete. The remaining FBRs scheduled to be taken out of service will be addressed following startup of the CTS.

# Tables

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*Operational Metrics*

Nevada Environmental Response Trust   Groundwater Extraction and Treatment System   Monthly Stakeholder Metrics				
Location ID	Average Flow Rate (gpm)	Perchlorate (mg/L) <sup>4</sup>	Chromium (TR) (mg/L) <sup>4</sup>	Chromium(VI) (mg/L) <sup>4</sup>
SWF Total Extraction <sup>1</sup>	714 <sup>3</sup>	9.2	0.0028	0.0040
AWF Total Extraction <sup>1</sup>	447 <sup>3</sup>	55	0.11	0.12
IWF Total Extraction <sup>1</sup>	47 <sup>3</sup>	383	5.9	5.8
AP Area Total Extraction <sup>1</sup>	8.8 <sup>3</sup>	542	0.18	0.18
GWTP Effluent <sup>2</sup>	61	404	0.29	ND
GW-11 Influent <sup>1</sup>	0.14	41	0.37	0.031
FBR Influent <sup>2</sup>	909	54	0.22	0.025

Notes:

ND = Not detected above laboratory method detection limit (Cr(VI) = 0.25 ug/L).

TR = Total Recoverable.

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.

Nevada Environmental Response Trust   Groundwater Extraction and Treatment System   Monthly Stakeholder Metrics			
Location ID	Perchlorate (lbs/month) <sup>1</sup>	Chromium (TR) (lbs/month) <sup>1</sup>	Chromium (VI) (lbs/month) <sup>1</sup>
SWF Total Extraction	2,446	0.75	1.1
AWF Total Extraction	9,197	18	20
IWF Total Extraction	6,778	104	103
AP Area Total Extraction	1,786	0.59	0.59
GWTP Effluent	9,233	6.6	ND
GW-11 Influent	2.1	0.019	0.0016
FBR Influent <sup>1</sup>	18,283	74	2.5

Notes:

ND = Not detected above laboratory method detection limit.

TR = Total Recoverable.

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



# Figures

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*Operational Metrics*

Figure 1 - GW-11 Pond Volume Through 10/31/2022

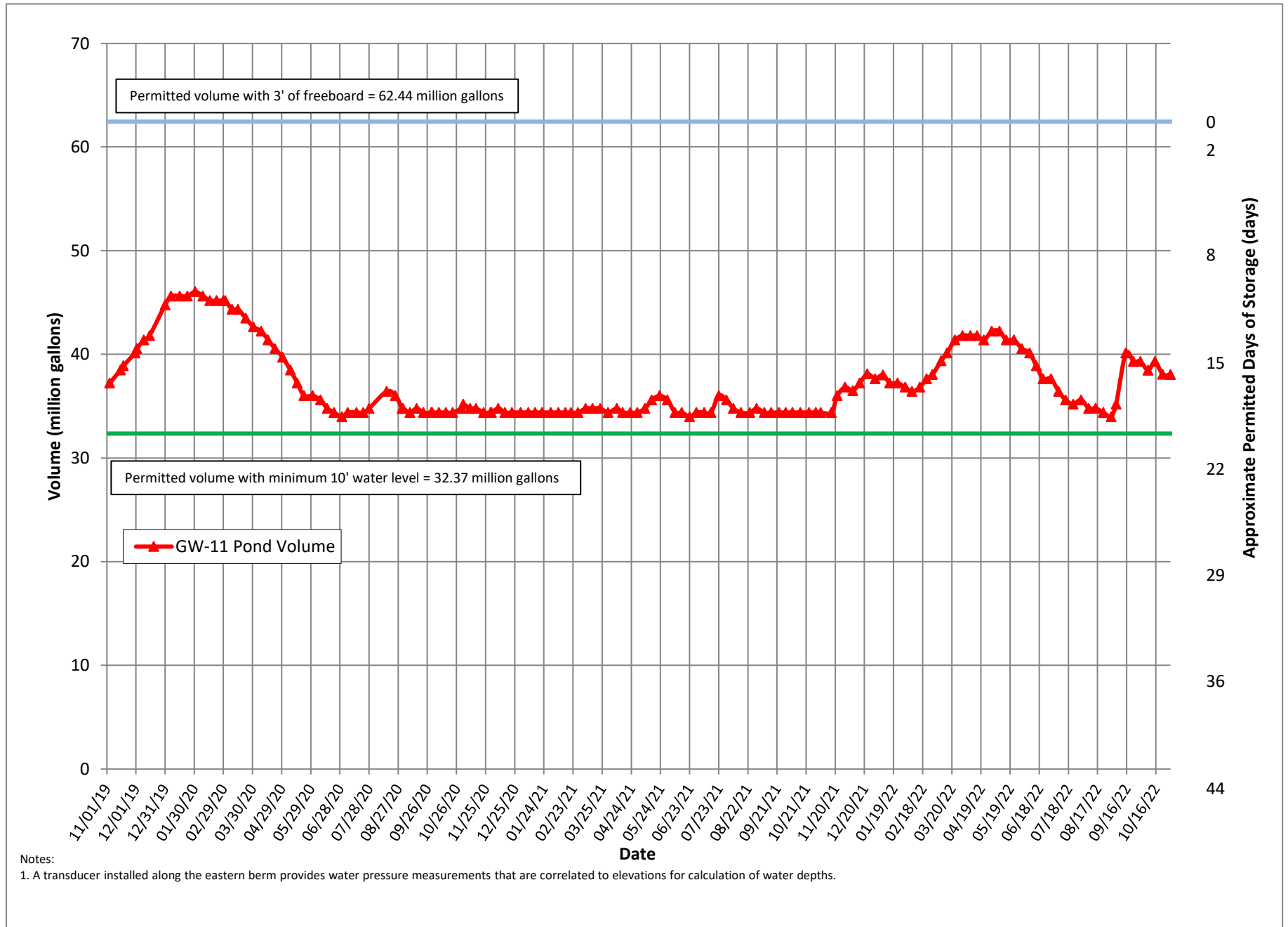
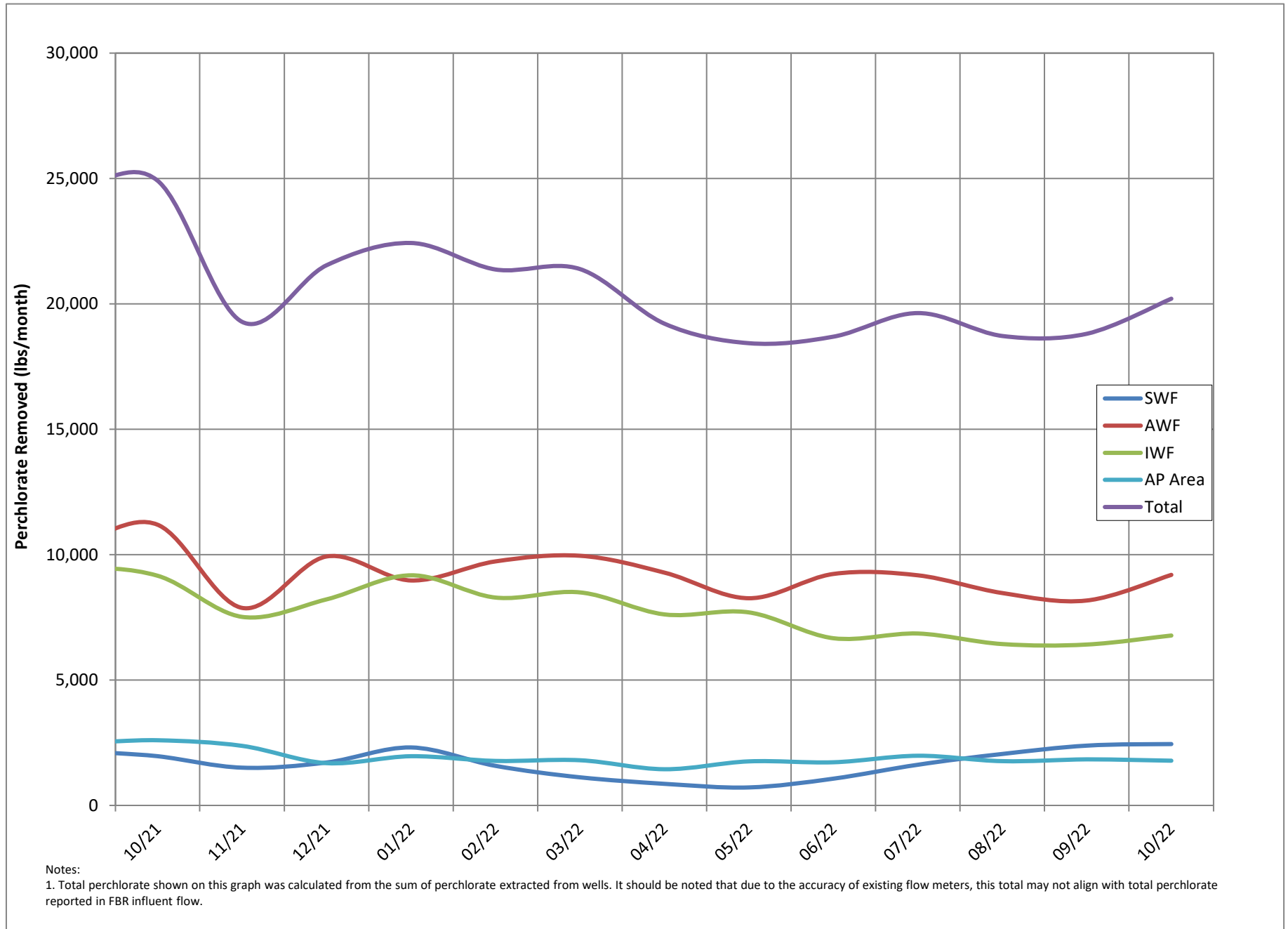


Figure 2 - Historical Perchlorate Mass Removed From Environment



# Attachment A

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*NPDES Tracking Sheet (Prepared by Ramboll)*

NPDES Permit NV0023060 - Analytes with Numerical Discharge Limits

Treated Effluent at Outfall 001																		
Continuous		Daily Samples, composited weekly		Weekly Grab Samples								Weekly, collected separately			Quarterly			
Flow Rate		Perchlorate		pH	Hexavalent Chromium	Total Chromium	Manganese	Total Iron	Total Inorganic Nitrogen (TIN)	Total Suspended Solids (TSS)	Total Ammonia as N		Total Phosphorus as P		BOD <sub>5</sub> (inhibited)		Total Dissolved Solids (TDS)	
30-Day Avg. (MGD)	Daily Maximum (MGD)	30-Day Avg. (mg/L)	30-Day Avg. (lbs/day)	Daily Min. (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 Avg. (mg/L)	30-Day Avg. (lbs/day)	30-Day Avg. (mg/L)	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	8,000	
January 2022	1.85	1.92	0.7	0.011	7.0	7.4	ND (<0.50)	12	61	1,100	0.88	10	150	2.0	7	ND (<5.0)	ND (<5.0)	39
February 2022	1.77	1.95	2.2	0.033	6.8	7.5	ND (<0.50)	7.4	78	1,200	1.6	17	240	2.6	6.1	ND (<5.0)	ND (<5.0)	38
March 2022	1.70	1.84	2.7	0.038	6.5	7.2	ND (<0.50)	2.1	170	1,200	2.9	12	170	1.5	8	ND (<5.0)	ND (<5.0)	35
April 2022	1.72	1.82	1.3	0.020	7.1	7.2	ND (<0.50)	14	200	590	2.5	8	120	1.7	3.5	ND (<5.0)	ND (<5.0)	36
May 2022	1.74	1.82	ND (<0.31)	0.0022	6.5	7.5	ND (<0.50)	11	320	1,100	2.5	6	87	1.8	5.1	ND (<5.0)	ND (<5.0)	36
June 2022	1.75	1.77	1.7	0.025	6.5	7.4	ND (<0.50)	14	270	890	2.2	10	140	1.7	3.9	ND (<5.0)	ND (<5.0)	37
July 2022	1.69	1.80	1.8	0.025	6.5	6.9	ND (<0.50)	19	280	930	1.8	11	150	1.5	4.3	ND (<5.0)	ND (<5.0)	36
August 2022	1.66	1.73	0.5	0.0065	6.5	7.4	ND (<0.50)	8.9	360	1,100	1.6	12	170	1.6	5.2	ND (<5.0)	ND (<5.0)	35
September 2022	1.52	1.85	0.6	0.0090	6.5	7.7	0.57	50	630	1,200	1.4	13	180	2.1	4.4	ND (<5.0)	ND (<5.0)	29
October (month to date)	1.74	1.84	ND (<0.31)	0.0022	6.8	6.9	ND (<0.50)	26	440	1,100	0.9	24	340	1.8	4.0	ND (<5.0)	ND (<5.0)	36

Daily Grab Sample Dates	Composit Sample Date	µg/L	lbs/day	Sample Date	S.U.	µg/L	µg/L	µg/L	mg/L	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	Sample Date	mg/L	lbs/day	Sample Date	mg/L	
1/2 - 1/8	1/8/2022	ND (<0.31)	0.16	0.0024	1/3/2022	7.0	ND (<0.50)	4.8	11	910	0.35	14	14	220	--	0.13	2.0	--	0.47	7.4	
1/9 - 1/15	1/15/2022	0.61	0.61	0.0094	1/10/2022	7.4	ND (<0.50)	2.2	38	600	0.41	ND (<10)	5	78	--	0.18	2.8	--	0.25	3.9	
1/16 - 1/22	1/22/2022	0.52	0.52	0.0081	1/17/2022	7.2	ND (<0.50)	12	55	1,100	0.64	19	19	301	--	0.16	2.5	--	0.73	12	
1/23 - 1/29	1/29/2022	1.5	1.5	0.023	1/24/2022	7.0	ND (<0.50)	1.4	61	530	0.63	ND (<10)	5	78	--	0.10	1.6	--	0.34	5.3	
1/30 - 2/5	2/5/2022	3.8	3.8	0.059	1/31/2022	7.2	ND (<0.50)	3.1	56	720	0.88	ND (<10)	5	78	--	0.084	1.3	--	0.41	6.4	
2/6 - 2/12	2/12/2022	ND (<0.31)	0.16	0.0024	2/7/2022	7.5	ND (<0.50)	4.2	3.0	69	730	1.6	16	16	249	--	0.17	2.7	--	0.38	5.9
2/13 - 2/19	2/19/2022	3.9	3.9	0.056	2/14/2022	6.8	ND (<0.50)	2.1	69	840	0.94	13	13	191	--	0.25	3.7	--	0.40	5.9	
2/20 - 2/26	2/26/2022	0.91	0.91	0.013	2/22/2022	7.3	ND (<0.50)	2.5	65	1,000	1.4	21	21	302	--	0.18	2.6	--	0.42	6.0	
2/27 - 3/5	3/5/2022	ND (<0.31)	0.16	0.0021	2/28/2022	7.2	ND (<0.50)	7.4	78	1,200	1.6	16	16	222	--	0.10	1.4	--	0.46	6.4	
3/6 - 3/12	3/12/2022	7.4	7.4	0.099	3/7/2022	7.2	ND (<0.50)	1.1	85	1,200	1.9	14	14	191	--	0.23	3.1	--	1.2	16	
3/13 - 3/19	3/19/2022	ND (<0.31)	0.16	0.0022	3/14/2022	6.5	ND (<0.50)	1.1	50	860	1.1	13	13	173	--	0.076	1.0	--	0.43	5.7	
3/20 - 3/26	3/26/2022	1.6	1.6	0.024	3/21/2022	7.1	ND (<0.50)	1.8	170	660	2.9	ND (<10)	5	74	--	0.053	0.79	--	0.40	5.9	
3/27 - 4/2	4/2/2022	4.3	4.3	0.064	3/28/2022	6.7	ND (<0.50)	2.1	160	820	2.5	15	15	230	--	0.074	1.1	--	0.45	6.9	
4/3 - 4/9	4/9/2022	4.3	4.3	0.064	4/4/2022	7.1	ND (<0.50)	1.2	190	590	2.4	ND (<10)	5	76	--	0.099	1.5	--	0.29	4.4	
4/10 - 4/16	4/16/2022	ND (<0.31)	0.16	0.0022	4/11/2022	7.2	ND (<0.50)	1.5	180	540	2.5	10	10	147	--	0.078	1.1	--	0.25	3.7	
4/17 - 4/23	4/23/2022	ND (<0.31)	0.16	0.0022	4/18/2022	7.2	ND (<0.50)	1.4	200	520	0.52	ND (<10)	5	73	--	0.12	1.7	--	0.16	2.3	
4/24 - 4/30	4/30/2022	0.71	0.71	0.0098	4/25/2022	7.1	ND (<0.50)	3.0	140	370	1.9	12	12	167	--	0.17	2.4	--	0.27	3.8	
5/1 - 5/7	5/7/2022	ND (<0.31)	0.16	0.0022	5/2/2022	7.3	ND (<0.50)	3.7	150	660	1.8	ND (<10)	5	69	--	0.11	1.5	--	0.31	4.3	
5/8 - 5/14	5/14/2022	ND (<0.31)	0.16	0.0023	5/9/2022	7.5	ND (<0.50)	3.4	170	770	2.5	ND (<10)	5	72	--	0.15	2.2	--	0.45	6.5	
5/15 - 5/21	5/21/2022	ND (<0.31)	0.16	0.0023	5/16/2022	6.5	ND (<0.50)	6.6	260	580	1.8	ND (<10)	5	75	--	0.10	1.5	--	0.33	4.9	
5/22 - 5/28	5/28/2022	ND (<0.31)	0.16	0.0023	5/23/2022	7.7	ND (<0.50)	6.1	280	560	2.2	ND (<10)	5	73	--	0.13	1.9	--	0.25	3.7	
5/29 - 6/4	6/4/2022	2.9	2.9	0.043	5/31/2022	7.3	ND (<0.50)	11	320	1,100	1.8	10	10	147	--	0.13	1.9	--	0.41	6.0	
6/5 - 6/11	6/11/2022	2.8	2.8	0.041	6/6/2022	7.4	ND (<0.50)	5.0	270	580	2.2	ND (<10)	5	74	--	0.13	1.9	--	0.26	3.8	
6/12 - 6/18	6/18/2022	2.6	2.6	0.038	6/13/2022	7.2	ND (<0.50)	1.4	250	890	2.0	16	16	233	--	0.095	1.4	--	0.31	4.5	
6/19 - 6/25	6/25/2022	ND (<0.31)	0.16	0.0022	6/20/2022	6.5	ND (<0.50)	4.5	260	680	2.1	ND (<10)	5	73	--	0.16	2.3	--	0.28	4.1	
6/26 - 7/2	7/2/2022	ND (<0.31)	0.16	0.0023	6/27/2022	6.5	ND (<0.50)	12	210	860	1.8	13	13	190	--	0.088	1.3	--	0.23	3.4	
7/3 - 7/9	7/9/2022	3.2	3.2	0.046	7/5/2022	6.9	ND (<0.50)	11	260	930	1.6	14	14	204	--	0.10	1.5	--	0.38	5.5	
7/10 - 7/16	7/16/2022	3.5	3.5	0.050	7/11/2022	6.5	ND (<0.50)	19	280	840	1.8	ND (<10)	5	72	--	0.085	1.2	--	0.20	2.9	
7/17 - 7/23	7/23/2022	ND (<0.31)	0.16	0.0022	7/18/2022	6.6	ND (<0.50)	2.9	240	630	1.4	ND (<10)	5	71	--	0.12	1.7	--	0.32	4.6	
7/24 - 7/30	7/30/2022	ND (<0.31)	0.16	0.0021	7/25/2022	6.8	ND (<0.50)	11	220	770	1.7	20	20	271	--	0.12	1.6	--	0.31	4.2	
7/31 - 8/6	8/6/2022	1.7	1.7	0.024	8/1/2022	7.4	ND (<0.50)	8.1	320	1,100	1.6	20	20	285	--	0.15	2.1	--	0.39	5.6	
8/7 - 8/13	8/13/2022	ND (<0.31)	0.16	0.0021	8/8/2022	6.7	ND (<0.50)	5.8	360	570	0.40	ND (<10)	5	65	--	0.10	1.3	--	0.26	3.4	
8/14 - 8/20	8/20/2022	ND (<0.31)	0.16	0.0022	8/16/2022	6.5	ND (<0.50)	3.7	350	770	1.4	14	14	200	--	0.095	1.4	--	0.36	5.1	
8/21 - 8/27	8/27/2022	ND (<0.31)	0.16	0.0022	8/22/2022	7.0	ND (<0.50)	8.9	280	890	0.34	16	16	220	--	0.079	1.1	--	0.48	6.6	
8/28 - 9/3	9/3/2022	ND (<0.31)	0.16	0.0020	8/29/2022	7.1	ND (<0.50)	4.2	330	670	1.1	ND (<10)	5	58	--	0.10	1.2	--	0.45	5.2	
9/4 - 9/10	9/10/2022	ND (<0.31)	0.16	0.0012	9/9/2022	7.7	0.57	ND (<0.85)	630	ND<10	0.23	ND (<10)	5	18	--	0.12	0.4	--	0.096	0.3	
9/11 - 9/17	9/17/2022	2.1	2.1	0.030	9/13/2022	7.0	ND (<0.50)	38	390	1,200	0.94	20	20	291	--	0.041	0.6	--	0.34	5.0	
9/18 - 9/24	9/24/2022	ND (<0.31)	0.16	0.0023	9/19/2022	7.3	NS	6.6	360	860	1.4	23	23	355	--	0.31	4.8	--	0.54	8.3	
9/25 - 10/1	10/1/2022	ND (<0.31)	0.16	0.0022	9/21/2022	6.5	ND (<0.50)	50	350	810	1.1	13	13	188	--	0.15	2.2	--	0.27	3.9	
10/2 - 10/8	10/8/2022	ND (<0.31)	0.16	0.0023	9/26/2022	6.5	ND (<0.50)	7.9	400	630	1.2	ND (<10)	5	73	--	0.17	2.5	--	0.31	4.5	
10/9 - 10/15	10/15/2022	ND (<0.31)	0.16	0.0022	10/5/2022	6.9	ND (<0.50)	26	350	1,100	0.85	35	35	511	--	0.099	1.4	--	0.36	5.3	
10/16 - 10/22	10/22/2022	ND (<0.31)	0.16	0.0023	10/12/2022	6.9	ND (<0.50)	10	440	580	0.66	16	16	229	--	0.11	1.6	--	0.26	3.7	
10/23 - 10/29	10/29/2022	NA	NA	NA	10/19/2022	6.8	ND (<0.50)	6.0	390	690	0.62	20	20	288	--	0.16	2.3	--	0.21	3.0	
					10/26/2022	NA	NA***	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
					11/2/2022	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	

Note: All analytical responsibilities are performed by TestAmerica Laboratories, Inc. (TestAmerica) in Irvine, California, unless otherwise indicated.  
\* Additional samples were collected this week.  
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)  
NS = Not Sampled or Not Analyzed  
-- = 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.  
\*\* Samples collected on September 9, 2022 occurred when only the RW was discharging.  
\*\*\* Effective 10/24/2022, hexavalent chromium samples are being analyzed at Pace Analytical.  
Last Updated: November 4, 2022

# Attachment B

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Equipment Tracking Form

Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
		<b>Main Plant Equipment</b>				
<b>1</b>		<b>Seep Wells and Lift Station 1</b>				
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		1	Installed a new section of piping that was damaged on the discharge of the turbines.
<b>2</b>		<b>Athens Road Wells and Lift Station 3</b>				
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			
<b>3</b>		<b>Lift Station 2 and Transmission Pipelines</b>				
3.01		Influent Pipeline	In operation			
3.02		Effluent Pipeline	Running		3	Repaired a leaking combo valve.
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			
<b>4</b>		<b>Interceptor Wells and Cr Treatment Plant</b>				
4.01		IWF Well Field, 30 wells	Running		2	Replaced the motor, pump, and discharge fitting on I-W.
4.02		Ferrous Sulfate Feed System	Running		3	Changed the head of the pump.
4.03		Polymer Feed System	Running			
4.04		Clarifier	In operation			
4.05		Filter Press	Running		4	Rebuilt the hydraulic cylinder for the press.
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		3	Replaced the high pressure relief valve on the air compressor
<b>5</b>		<b>Equalization Area and GW-11 Pond</b>				
5.01	PID10A	Pond GW-11	In operation		3	Replaced the leads on the NE pond corner pump
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		1	Area was struck by lightning. Had to replace the breaker for the INF pump and numerous breakers. Also replaced the Profibus connectors.
5.06	PID10A	Raw Water Feed Pump - P102A				
5.07	PID10A	Raw Water Feed Pump - P102B				

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Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
5.08	PID10A	F-101 Filters	Running			
5.09	PID10B	Carbon Absorber - LGAC 201A				
5.10	PID10B	Carbon Absorber - LGAC 201B				
5.11	PID10B	Carbon Absorber - LGAC 201C				
<b>6</b>		<b>First Stage FBRs A, 1 &amp; 2</b>				
6.01	PID14	FBR A				EQUIPMENT OFFLINE
6.02	PID14	Separator Tank - 1401				EQUIPMENT OFFLINE
6.03	PID14	Media Return Pump - P 1401				EQUIPMENT OFFLINE
6.04	PID14	P1401A				EQUIPMENT OFFLINE
6.05	PID01A	P1401B				EQUIPMENT OFFLINE
6.06	PID01A	FBR 1	Running		1	Loaded sand into the FBR.
6.07	PID02A	FBR 2	Running			
6.08	PID01A	First Stage Separator Tank - T2011	Running			
6.09	PID01A	Media Return Pump - P2011	Running			
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			Equipment offline
6.20	PID15	FBR 1 Nutrient (Phos Acid) Feed Pump - P1521	Running		2	Installed a new pump head.
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			
<b>7</b>		<b>First Stage FBRs 3 &amp; 4</b>				
7.01	PID01B	FBR 3	Running			
7.02	PID01B	FBR 4	Running			
7.03	PID02B	First Stage Separator Tank - T2012	Running			
7.04	PID01B	Media Return Pump - P2012	Running			
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			

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Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
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			
<b>8</b>		<b>Second Stage FBRs 5 &amp; 6</b>				
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			
<b>9</b>		<b>Second Stage FBRs 7 &amp; 8</b>				
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			
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			
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			
<b>10</b>		<b>Aeration and DAF System</b>				
10.01	PID04	Aeration Tank	In operation			
10.02	PID04	Aeration Blower - B401	Running			

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Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
10.03	PID04	Bio filter	In operation			
10.04	PID04	Nutrient Solution	Running			
10.05	PID04	Bio filter Sump			2	Replaced the pump and motor.
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	Took the N.DAF offline to repair the skimmer system.
<b>11</b>		<b>Pumping System (Old Effluent)</b>				
11.01	PID06	Effluent Tank 601	In operation			
11.02	PID06	Effluent Pump - P601	Running			
11.03	PID06	Effluent Pump - P602				
<b>12</b>		<b>Sand Filter System</b>				
12.01	PID17	Sand Filter				
12.02	PID17	Filter Reject Tank	In operation			
12.03	PID17	Filter Reject Pump - P1701A	Standby			
12.04	PID17	Filter Reject Pump - P1701B	Running			
<b>13</b>		<b>Effluent Tank and Pumping</b>				
13.01	PID10C	UV Effluent Tank	Running			
13.02	PID10C	Effluent Booster Pump - P1302A	Running			
13.03	PID10C	Effluent Booster Pump - P1302B	Standby			
13.04	PID10C	Area Around Effluent and North D-1	Running			
<b>14</b>		<b>Solids Collection and Pressing System</b>				
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	Replaced the air ends of the pump.
14.07	PID09	West Press	Standby			
14.08	PID09	East Press	Running			

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Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
14.09	PID09	Filtrate Tank	In operation			
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running			
<b>Chemical Systems</b>						
15		<b>Electron Donor System</b>				
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			
24	PID07B	Polymer Systems - DAF	In operation		2	Installed a new pump with new tubing.
25	PID09	Polymer System - Solids Dewatering (2 tanks, 2 centrifugal pumps, mixer, volumetric feeder)	In operation			
<b>Utility Systems</b>						
26		<b>Compressed Air System</b>				
26.01	PID08	West Compressor	Running			
26.02	PID08	East Compressor	Running			
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			
<b>Miscellaneous Systems</b>						
33		Operations Office/Network	In operation			

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Sub-System	P&ID	Description	Status <sup>1</sup>	Checked	Criticality <sup>2</sup>	Notes
34		Laboratory Analyzers	In operation			
35		Security Systems	In operation			
		<b>Shelf Spares</b>				
		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			

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# Attachment C

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*Facility Repair/Replacement Project Status*

## GWETS AMENDMENT 8 REPAIR/REPLACEMENT STATUS

PREPARED BY NEVADA ENVIRONMENTAL RESPONSE TRUST

ITEM	RESOLUTION	WORK AUTHORIZATION	STATUS AS OF 10/31/22
1	Dissolved Air Floatation (DAF) Vessels ETI to pilot an alternate technology (AquaDisk filters) and make a recommendation	ETI WA 22-01 \$58,203 <i>Executed 1/13/22</i>	Pilot is complete. Working on proposal for a new DAF.
2	DAF Pump Skid Rebuild On-hold pending outcome of DAF pilot and evaluation of plant hydraulics	N/A	N/A
3	Main Influent Pipeline Air/Vacuum Release Valves ETI to replace valves and valve boxes as required	ETI WA 21-06 \$40,535 <i>Executed 12/21</i>	Work was started but delayed due to seeping groundwater conditions at the Seep Well Field. Work has begun again and currently anticipating to complete site work during December plant shutdown.
4	In-kind Replacement of GWTP GWTP replacement not required due to design/build of Chromium Treatment Subsystem	N/A	N/A
5	Wiring at Lift Station #3 (controls) ETI to replace wiring as required	ETI WA 21-03 \$60,035 <i>Executed 11/21</i>	Project is complete.
6	Wiring at Lift Station #1 (wells) Project on hold due to potential modification of the SWF with ROD or due to Cadence Sports Park. NERT will authorize interim repairs if necessary.	N/A	N/A
7	Motor Control Center at Lift Station #1 ETI to replace as required	ETI WA 21-04 \$186,315 <i>Executed 12/21</i>	Work started but delayed due to City flooding the seep area. Lift Station 1. MCC & major equipment has been delivered. Work to start in November. Final connection to be completed during the December plant shutdown.
8	IWF Wiring ETI to replace as required	ETI WA 21-08 \$436,481 <i>Executed 12/21</i>	New wire has been installed at the wells. Delivery of the new starters has been delayed. Installation to occur during the December plant shutdown.
9	FBR Skid Equipment Replacements ETI to replace what is immediately required in lieu of complete replacements	ETI WA 22-04 \$142,061 <i>Executed 2/4/22</i>	Project is complete.
10	Influent / Effluent Pump Motors ETI to procure additional motors for more frequent rotation	ETI WA 22-03 \$31,800 <i>Executed 2/4/22</i>	Equipment is onsite, scheduling replacement in November.
11	Overhaul Lift Station #2 West Wet Well Turbine ETI to overhaul as required	ETI WA 22-07 \$97,304 <i>Executed 3/7/22</i>	Installation complete, completing project closeout.

## GWETS AMENDMENT 8 REPAIR/REPLACEMENT STATUS

PREPARED BY NEVADA ENVIRONMENTAL RESPONSE TRUST

ITEM		RESOLUTION	WORK AUTHORIZATION	STATUS AS OF 10/31/22
12	Replacement of Safety Showers	ETI to replace safety shower system in batches over ~2 years	ETI WA 21-05 \$131,899 <i>Executed 11/21</i>	Project is complete.
13	East Air Compressor	ETI to replace as required	ETI WA 21-02 \$29,784 <i>Executed 10/21</i>	Project is complete.
14	pH and ORP Probes	ETI to replace certain probes as required throughout FBR plant	ETI WA 21-07 \$108,893 <i>Executed 11/21</i>	Equipment is on order and starting to arrive onsite. Phase 1 estimated completion by November 2022
15	Exterior Shell of Ethanol Storage Tank	ETI to repair as required	-	Submittal of draft Work Authorization for Trust review by 12/31/22. Awaiting contractor quote.
16	FBR Containment Pad Concrete	ETI to monitor status of affected areas. NERT will authorize interim repairs if necessary.	N/A	N/A
17	Siemens Control System Repairs	Spare parts and software updates to be procured in lieu of a complete system replacement.	ETI WA 21-09 \$103,061 <i>Executed 11/21</i>	All spare parts are onsite. Computers are onsite, awaiting programming changes and installation scheduled in September. Work expected to be completed by end of November 2022.
18	Sludge Pump and Sludge Bins	ETI to replace as required	ETI WA 22-02 \$102,183 <i>Executed 2/7/22</i>	Project is complete.
19	Lift Station Repairs	ETI to replace as required	ETI WA 22-05 \$20,738 <i>Executed 2/4/22</i>	Project is complete.
20	D-1 Asbestos Evaluation	NERT to complete an asbestos survey	TT WA 21-12 \$7,400 <i>Executed 11/21</i>	Survey complete. Report complete and forwarded to ETI. Project complete.