

To:	Nevada Division of Environmental Protection Nevada Environmental Response Trust
Cc:	Nevada Environmental Response Trust Stakeholders
From:	Michael Del Vecchio, Director Engineering and Project Management
Date:	November 20, 2023
Subject:	NERT – GWETS Operation Monthly Report – October 2023

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 2023.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in October 2023. Flow from 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 247 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 1004 gpm. At the end of the month, the filled GW-11 Pond volume was at 43.1 million gallons (MG), which would allow 13.5 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 since the end of September 2023; 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 2.5 mg/L for the month. The influent perchlorate concentration to the FBR plant averaged 44 mg/L for the month, with a maximum concentration of 47 mg/L. In comparison, the influent perchlorate concentration to the FBRs for the month of September 2023 averaged 51 mg/L, with a maximum concentration of 53 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

- Extraction well field shutdown of the SWF occurred on October 10, 2023 from 7:25pm to 7:37pm due to a malfunction at the temporary electrical generator at Lift Station 1. Maintenance activities were completed and Lift Station 1 was brought back online. Extraction well PC-119 did not resume pumping until October 11, 2023 at 4:01am.
- Extraction well field shutdown of the SWF occurred on October 16, 2023 from 3:45pm to 5:15pm due to an electrical malfunction. Maintenance activities were completed and Lift Station 1 was brought back online.
- Effluent diversion occurred on October 18, 2023 from 1:15am to 2.05am as a precautionary measure due to elevated levels of perchlorate in the effluent. Adjustments were made to the process and the effluent was returned to the outfall following confirmation via laboratory testing that perchlorate was below the effluent guideline. Approximately 124,000 gallons of water were added to the GW-11 Pond.
- Effluent diversion occurred on October 24, 2023 from 1:23pm to 2:18pm as a precautionary measure due to elevated levels of perchlorate in the effluent. Adjustments were made to the process and the effluent was returned to the outfall following confirmation via laboratory testing that perchlorate was below the effluent guideline. Approximately 57,000 gallons of water were added to the GW-11 Pond.
- Influent diversion occurred on October 26, 2023 from 6:00am to 3:54pm due to scheduled repairs
 on the effluent pipeline at the EQ area. The repairs were conducted and the plant was brought back
 online. Approximately 630,000 gallons of water were added to the GW-11 Pond.
- Influent diversion occurred on October 29, 2023 from 9:35am to 3:30pm due to a PLC error.
 Troubleshooting was conducted, the error was resolved, and the plant was brought back online.
 Approximately 75,000 gallons of water were added to the GW-11 Pond.

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. Flooding conditions were observed again in September 2023 as a result of the CoH's use of inactive Birding Ponds 10 through 13 again in August and September 2023. 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 again resulting in increased loading to the IX treatment plant during September 2023. The CoH ceased discharging water to Birding Ponds 10 through 13 in early October 2023. Both the groundwater elevation adjacent to the SWF and the perchlorate concentrations in groundwater are elevated and are expected to remain elevated for an extended period as result of CoH's August/September 2023 use of the inactive Birding Ponds assuming no additional significant usage by the CoH occurs.

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. Pumped out the water from PC-120 and PC-121 well vaults. Replaced fuses as needed.
 - II. Repaired generator and parts for resin changeouts at the IX.
 - III. Replaced the motor on the pump in AWF extraction well ART-7A.
 - IV. Replaced the pump on the pump in AWF extraction well ART-8A.
 - V. Installed a new pump and motor at Interceptor booster pump P1-A.
 - VI. Pulled the pump from the sump at the southwest corner of the GW-11 Pond and repaired the connections.
 - VII. Replaced the damaged 8" piping on the effluent line.
 - VIII. Replaced the discharge check valve.
 - IX. Removed the old transducer from the level control valve for Separator 1.
 - X. Rebuilt the head of the pump for the ethanol feed for FBR2.
 - XI. Repaired the rakes and brought the North DAF back online.
- Preventative maintenance performed by ETI in the reporting month included:
 - I. Re-calibrated the level sensor on the wet well.
 - II. Calibrated the feed valve on FBR 4.
 - III. Replaced the fittings on the check valve of the injection point of FBR 6.
 - IV. Cycled the feed valves on the backstage FBRs for proper operation.
 - V. Opened the Aeration tank and inspected and removed solids.
 - VI. Replaced the belt and the air filter on the Aeration tank blower.
 - VII. Calibrated the flow control valve on the P-601 pump.
 - VIII. Inspected and cleaned the HMI cabinets at LS3.
 - IX. Calibrated the pH and ORP lines.
 - X. Inspected and locked the screens on the flowmeters.

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

6. Treatment System Extension

During October 2023, the flow rate to the TSE averaged approximately 50.6 gpm. The influent perchlorate concentration to the TSE averaged 9.1 mg/L for the month, with a maximum concentration of 8.7 mg/L. In comparison, the influent perchlorate concentration to the TSE for the month of October 2023 averaged 8.7 mg/L, with a maximum concentration of 9.4 mg/L.

Facility Projects

- 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. All work with the
 exception of the replacement of the DAF have been completed. Specific details on in-progress
 items are provided below:
 - I. (WA 23-03) Dissolved Air Floatation (DAF) Vessel replacement
 - 1. DAF equipment is on order. The expected delivery is December 2023.
 - II. Concrete Repair at various locations on FBR pad
 - 1. Scheduling work with selected contractor. Work is anticipated to be completed in December 2023.
- 2. 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 in the 2nd quarter of 2024.
- 3. Water Reuse Consistent with the Trust's efforts to reduce its water consumption and acknowledgment of best management practices, accelerated by the Basic Water Company (BWC) bankruptcy filing, the Trust has actively pursued multiple options to become independent of the BWC water distribution system. To that end, it is the objective of the Trust to replace the water currently distributed by BWC through implementation of an effluent filtration system (EFS) to allow for reuse of the GWETS effluent. The filtered effluent can only be used within treatment operations. The filtration system was delivered to the NERT Site in May 2023 and equipment integration began in June 2023 following receipt of NDEP's approval of the 100 percent design on June 6, 2023. A second identical filtration unit has been integrated into the EFS and is operating in a lead-lag configuration.

Tables

Operational Metrics

Nevada Environmental Response Ti	Nevada Environmental Response Trust Groundwater Extraction and Treatment System Monthly Stakeholder Metrics										
Location ID	Average Flow Rate (gpm)	Perchlorate (mg/L) ⁴	Chromium (TR) (mg/L)4	Chromium(VI) (mg/L)⁴							
SWF Total Extraction ¹	776³	8.9	0.00018	0.0025							
AWF Total Extraction ¹	451 ³	47	0.11	0.12							
IWF Total Extraction ¹	47³	349	5.4	5.6							
AP Area Total Extraction ¹	7.9 ³	572	0.18	0.20							
Chromium Treatment Subsystem Effluent ²	56	374	0.95	0.00040							
GW-11 Influent ¹	0.22	29	0.047	0.057							
FBR Influent ²	1,004	44	0.097	0.037							
Treatment System Extension Influent ²	51	9.7	0.22	0.24							

Notes:

Table Updated: 11/16/2023

^{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 Tru	st Groundwater Extraction and Tre	atment System I Monthly Stakehold	ler Metrics
Location ID	Perchlorate (lbs/month) ¹	Chromium (TR) (lbs/month) ¹	Chromium (VI) (lbs/month) ¹
SWF Total Extraction	2,151	0.044	0.60
AWF Total Extraction	7,839	18	20
IWF Total Extraction	6,115	94	97
AP Area Total Extraction	1,693	0.52	0.58
Chromium Treatment Subsystem Effluent	7,740	20	0.0084
GW-11 Influent	2.4	0.0039	0.0047
FBR Influent ¹	16,364	36	14
Treatment System Extension Influent ¹	184	4.2	4.5

Notes:

Table Updated: 11/16/2023

TR = Total Recoverable.

^{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 10/31/2023

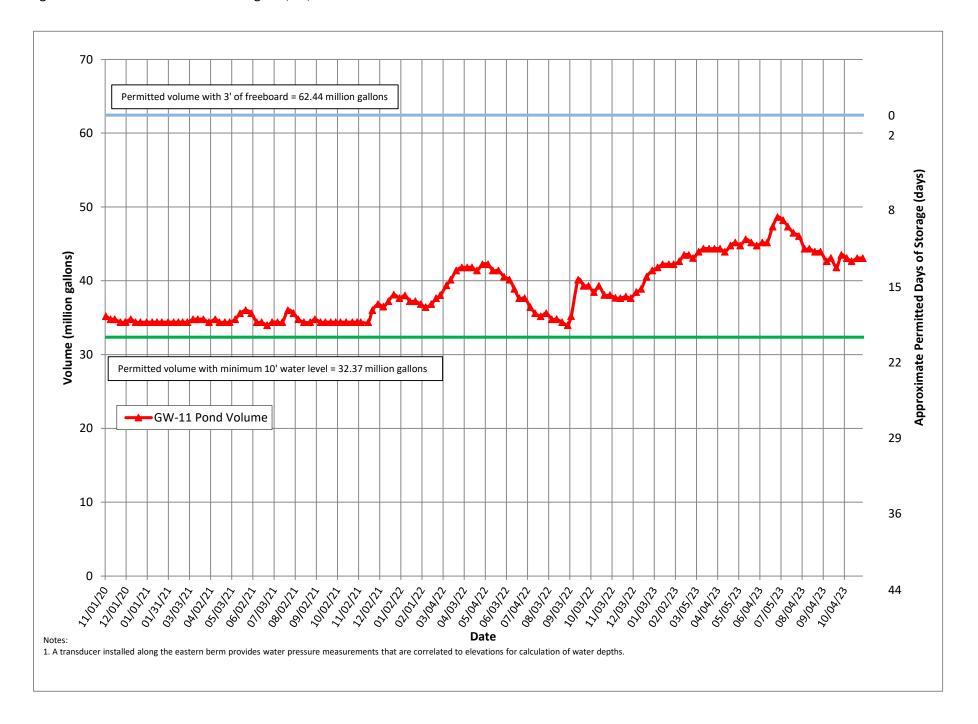
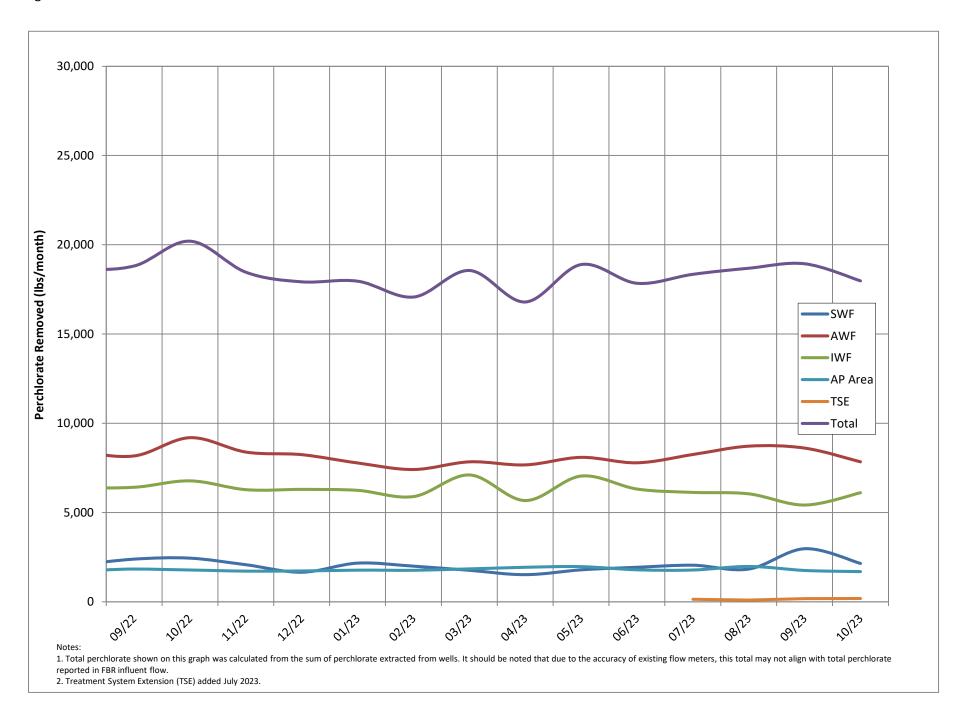


Figure 2 - Historical Perchlorate Mass Removed From Environment



Attachment A

NPDES Tracking Sheet (Prepared by Ramboll)

										Trea	ated Effluent at Ou								
	Cont	tinuous	Daily Samples, con	nposited weekly							Weekly Grab S	amples					Weekly, collected	separately	Quarterly
	Flor	w Rate	Perchlo	rate	р	н	Hexavalent Chromium	Total Chromium	Manganese	Total Iron	Total Inorganic Nitrogen (TIN)	Total Suspe (TS		Total Ammonia as N	Total Phosphorus as P		BOD _s (inhibi	ted)	Total Dissolved Solids (TDS)
	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)	a 30-Day Avg. (lbs/day)	30-Day Avg. (lbs/day)	30-Day Avg. (lbs/day)		Day Avg. Daily M [mg/L] (mg/L		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
January 2023	1.70	1.76	ND (<1.6)	0.011	6.6	6.9	ND (<0.150)	26	390	1,100	0.96	13	190	1.9	5.1	N	D (<5.0) ND (<5	.0) 36	
February 2023	1.69	1.75	1.1	0.015	6.8	7.1	ND (<0.150)	41	340	1,300	1.3	22	310	4.2	7.2	N	D (<5.0) ND (<5	.0) 35	3,900
March 2023	1.67	1.78	2.3	0.033	7.1	7.4	ND (<0.150)	13	320	1,100	1.3	20	270	3.6	5.6	N	D (<5.0) ND (<5	.0) 35	
April 2023	1.63	1.75	1.6	0.022	6.75	7.1	ND (<0.150)	35	390	940	0.82	15	200	2.5	4.6	N	D (<5.0) ND (<5	.0) 34	
May 2023	1.68	1.79	3.8	0.052	7.0	7.2	ND (<0.150)	20	720	1,400	1.1	15	220	2.7	5.7	N	D (<5.0) ND (<5	.0) 35	3,800
June 2023	1.47	1.72	ND (<1.6)	0.010	6.6	6.6	ND (<0.150)	9.0	460	1,300	0.75	12	160	1.8	3.7	1	D (<5.0) ND (<5	.0) 34	
July 2023	1.67	1.82	1.5	0.021	6.5	7.20	0.177	25	330	1,200	0.67	14	200	1.8	5.4		3.1 4.7	43	
August 2023	1.62	1.96	ND (<1.6)	0.011	6.56	7.12	ND (<0.150)	22	480	1,600	0.71	19	240	1.8	6.1	1	D (<5.0) ND (<5	.0) 33	4,200
September 2023	1.67	1.85	2.0	0.029	 6.97	7.22	ND (<0.150)	8.6	420	1,100	1.1	17	230	0.9	5.4	N	D (<5.0) ND (<5	.0) 36	
October 2023 (month to date)	1.70	1.81	4.7	0.053	7.00	7.10	ND (<0.150)	20	360	1,300	1.4	13	190	1.5	6.7		4.1 8.7	60	
November 2023 (month to date)	1.65	1.91	NA	NA	 6.90	7.14	ND (<0.150)	7.7	410	1,000	1.6	22	260	0.2	3.8	N	D (<5.0) ND (<5	.0) 28	

Daily Grab	Composite				1																1					
Sample Dates	Sample Date		μg/L	lbs/day	Sample Date	s.u.	μg/L	μg/L	μg/L	μg/L	mg/L	mg/L		lbs/day	mg	g/L	lbs/day	mg	/L	lbs/day	Sample Date	mg/L		lbs/day	Sample Date	mg/L
1/1 - 1/7	1/7/2023	ND (<1.6)	0.8	0.011	1/4/2023	6.6	ND (<0.150)	10	340	830	0.87	ND(<10)	5	70		0.090	1.3		0.43	6.0	1/4/2023	ND (<5.0)	2.5	35		
1/8 - 1/14	1/14/2023	ND (<1.6)	0.8	0.011	1/11/2023	6.8	ND (<0.150)	22	280	690	0.80		10	142		0.044	0.63		0.30	4.3	1/11/2023	ND (<5.0)	2.5	36		
1/15 - 1/21	1/21/2023	ND (<1.6)	0.8	0.012	1/18/2023	6.8	ND (<0.150)	15	350	1100	0.80	-	19	275		0.16	2.3		0.40	5.8	1/18/2023	ND (<5.0)	2.5	36		
1/22 - 1/28	1/28/2023	ND (<1.6)	0.8	0.012	1/25/2023	6.9	ND (<0.150)	26	390	760	0.96		19	277		0.24	3.5		0.31	4.5	1/25/2023	ND (<5.0)	2.5	36		
1/29 - 2/4	2/4/2023	ND (<1.6)	0.8	0.011	2/1/2023	7.1	ND (<0.150)	7.6	340	620	0.80		20	281		0.16	2.3		0.32	4.5	2/1/2023	ND (<5.0)	2.5	35		
2/5 - 2/11	2/11/2023	ND (<1.6)	0.8	0.011	2/8/2023	6.8	ND (<0.150)	41	290	1100	0.87		24	349		0.19	2.8		0.31	4.5	2/8/2023	ND (<5.0)	2.5	36		
2/12 - 2/18	2/18/2023	2.0	2.0	0.027	2/15/2023	6.8	ND (<0.150)	3.8 25	280	970	0.75	-	20	282		0.15	2.1		0.49	6.9	2/15/2023	ND (<5.0)	2.5	35	2 /20 /2022	2 000
2/19 - 2/25	2/25/2023	ND (<1.6)	0.8	0.011	2/22/2023	7.0	ND (<0.150)	13	260	1300	1.3	-	24	335		0.69	9.6		0.91	12.7	2/22/2023	ND (<5.0) ND (<5.0)	2.5	35 36	2/28/2023	3,900
2/26 - 3/4 3/5 - 3/11	3/4/2023 3/11/2023	ND (<1.6) ND (<1.6)	0.8	0.012 0.011	3/1/2023 3/8/2023	7.2 7.1	ND (<0.150) ND (<0.150)	9.5	320 300	1100 620	1.0	-	12 14	174 196	-	0.20	2.9 3.2		0.49	7.1 4.2	3/1/2023 3/8/2023	ND (<5.0) ND (<5.0)	2.5	35 35		
3/12 - 3/18	3/11/2023	ND (<1.6) ND (<1.6)	0.8	0.011	3/15/2023	7.2	ND (<0.150) ND (<0.150)	11	290	860	1.3	_	22	284	-	0.23	4.3	-	0.40	5.2	3/15/2023	ND (<5.0)	2.5	32		
3/19 - 3/25	3/25/2023	ND (<1.6)	0.8	0.011	3/15/2023	7.1	ND (<0.150)	5.3	240	710	0.71	-	21	298		0.33	2.6	-	0.40	4.7	3/22/2023	ND (<5.0)	2.5	35		
		8.4	8.4	0.120		7.4	ND (<0.150) ¹	4.8	260	620	1.1		29	413		0.35	5.0	-	0.49	7.0		ND (<5.0)	2.5	36		
3/26 - 4/1 4/2 - 4/8	4/1/2023 4/8/2023	ND (<1.6)	0.8	0.011	3/29/2023 4/5/2023	6.8	ND (<0.150) ND (<0.150)	0.87	260	210	0.79		16	223		0.35	2.2		0.49	4.5	3/29/2023 4/5/2023	ND (<5.0)	2.5	36 35		
4/9 - 4/15	4/6/2023	3.9	3.9	0.011	4/12/2023	7.0	ND (<0.150) ND (<0.150)	35	390	540	0.79	_	19	268	-	0.16	2.4	-	0.32	4.5	4/12/2023	ND (<5.0)	2.5	35		
4/16 - 4/22	4/15/2023	ND (<1.6)	0.8	0.054	4/12/2023	6.75	ND (<0.150)	6.6	260	370	0.75	_	18	237		0.17	2.4	-	0.30	4.4	4/12/2023	ND (<5.0)	2.5	33		
4/23 - 4/29	4/29/2023	ND (<1.6)	0.8	0.011	4/26/2023	7.1	ND (<0.150)	6.9	290	940	0.82	ND(<10)	5	69		0.18	2.5		0.41	5.7	4/26/2023	ND (<5.0)	2.5	35		
4/30 - 5/6	5/6/2023	ND (<1.6)	0.8	0.011	5/3/2023	7.0	ND (<0.150)	4.4	360	280	1.1		15	205	-	0.34	4.6		0.46	6.3	5/3/2023	ND (<5.0)	2.5	34		
5/7 - 5/13	5/13/2023	ND (<1.6)	0.8	0.011	5/10/2023	7.2	ND (<0.150)	20	280	1400	0.82		33	450		0.12	1.6		0.58	7.9	5/10/2023	ND (<5.0)	2.5	34		
5/14 - 5/20	5/20/2023	ND (<1.6)	0.8	0.011	5/17/2023	7.0	ND (<0.150)	4.8	240	570	0.77		14	206		0.17	2.5		0.34	5.0	5/17/2023	ND (<5.0)	2.5	37	5/17/2023	3,800
5/21 - 5/27	5/27/2023	ND (<1.6)	0.8	0.012	5/24/2023	7.1	ND (<0.150)	2.1	290	470	0.85		10	149		0.16	2.4		0.36	5.3	5/24/2023	ND (<5.0)	2.5	37		
5/28 - 6/3	6/3/2023	16	16	0.216	5/30/2023	7.16	ND (<0.150)	2.6	720	300	0.85	ND(<10)	5	68		0.18	2.5		0.29	3.9	5/30/2023	ND (<5.0)	2.5	34		
6/4 - 6/10	6/10/2023	ND (<1.6)	0.8	0.011	6/7/2023	6.6	ND (<0.150)	5.2	310	680	0.63	-	13	185		0.065	0.9		0.23	3.3	6/7/2023	ND (<5.0)	2.5	35		
6/11 - 6/17	6/17/2023	ND (<1.6)	0.8	0.010	6/14/2023	6.6	ND (<0.150)	6.5	460	600	0.75		10	126		0.28	3.5		0.31	3.9	6/14/2023	ND (<5.0)	2.5	32		
6/18 - 6/24	6/24/2023	ND (<1.6)	0.8	0.009	6/21/2023	6.6	ND (<0.150)	4.0	450	480	0.59		11	151		0.15	2.1		0.19	2.6	6/21/2023	ND (<5.0)	2.5	34		
6/25 - 7/1	7/1/2023	ND (<1.6)	0.8	0.009	6/28/2023	6.6	ND (<0.150)	9.0	380	1300	0.50	-	13	170		0.061	0.8		0.37	4.8	6/28/2023	ND (<5.0)	2.5	33		
7/2 - 7/8	7/8/2023	ND (<1.6)	0.8	0.011	7/5/2023	6.5	ND (<0.150)	10	300	1200	0.67	-	14	181		0.16	2.1		0.40	5.2	7/5/2023	ND (<5.0)	2.5	32		
7/9 - 7/15	7/15/2023	ND (<1.6)	0.8	0.012	7/13/2023	7.20	0.177	25	330	1000	0.42		22	295		0.10	1.3		0.36	4.8	7/13/2023	ND (<5.0)	2.5	34		
7/16 - 7/22	7/22/2023	3.5	3.5	0.049	7/19/2023	6.7	ND (<0.150)	1.2	260	520	0.34	ND(<10)	5	73	ND(<0.039)	0.0195	0.3		0.29	4.2	7/19/2023	ND (<5.0)	2.5	36		
7/23 - 7/29	7/29/2023	ND (<1.6)	0.8	0.011	7/27/2023	6.87	ND (<0.150)	11	260	250	0.61		16	233		0.23	3.3		0.52	7.6	7/27/2023	4.7 ²	4.7	68		
7/30 - 8/5	8/5/2023	ND (<1.6)	0.8	0.011	8/2/2023	6.93	ND (<0.150)	14	390	880	0.34	-	20	300		0.071	1.1		0.78	11.7	8/2/2023	ND (<5.0)	2.5	38		
8/6 - 8/12	8/12/2023	ND (<1.6)	0.8	0.011	8/9/2023	7.12	ND (<0.150)	22	430	800	0.42		12	168		0.058	0.8		0.23	3.2	8/9/2023	ND (<5.0)	2.5	35		
8/13 - 8/19	8/19/2023	ND (<1.6)	0.8	0.008	8/16/2023	6.56	ND (<0.150)	10	230	1300	0.50	-	28	202		0.11	0.8		0.11	0.8	8/16/2023	ND (<5.0)	2.5	18	8/16/2023	4,200
8/20 - 8/16	8/26/2023	ND (<1.6)	0.8	0.011	8/23/2023	7.08	ND (<0.150) ³	13	480	1600	0.54	-	20	295		0.14	2.1		0.55	8.1	8/23/2023	ND (<5.0)	2.5	37		
8/27 - 9/2	9/2/2023	ND (<1.6)	0.8	0.012	8/30/2023	6.98	ND (<0.150)	10	480	1100	0.71		15	229		0.27	4.1	-	0.43	6.6	8/30/2023	ND (<5.0)	2.5	38		
9/3 - 9/9	9/9/2023	ND (<1.6)	0.8	0.012	9/6/2023	6.97	ND (<0.150)	4.6	420	1100	0.73	-	11	170		0.11	1.7		0.22	3.4	9/6/2023	ND (<5.0)	2.5	39		
9/10 - 9/16	9/16/2023	6.1	6.1	0.087	9/13/2023	7.08	ND (<0.150)	8.6 4.2	340	1100	0.71	-	16	232		0.054	0.8		0.41	5.9	9/13/2023	ND (<5.0)	2.5 2.5	36		
9/17 - 9/23	9/23/2023	ND (<1.6)	0.8	0.011	9/20/2023	7.22	ND (<0.150)	4.2 ND (<4.3)	340	930	1.1	-	14	213		0.053	0.8		0.24	3.7	9/20/2023	ND (<5.0)	2.5	38		
9/24 - 9/30	9/30/2023	ND (<0.63) ND (<1.6)	0.315	0.004	9/27/2023	7.18	ND (<0.150)	8.1	360 330	820 1000	0.93 1.2	-	25 15	324 219	ND(<0.039)	0.0195	2.0	-	0.68	8.8 5.6	9/27/2023	ND (<5.0) ND (<5.0)	2.5	32 37		
10/1 - 10/7 10/8 - 10/14	10/7/2023 10/14/2023	ND (<1.6) ND (<0.63)	0.8	0.012	10/4/2023 10/11/2023	7.10	ND (<0.150) ND (<0.150)	20	320	1300	0.74	-	20	219	ND(<0.039)	0.14	0.29	-	0.38	9.7	10/4/2023 10/11/2023	ND (<5.0) ND (<5.0)	2.5	37		
10/15 - 10/21	10/14/2023	13	13	0.192	10/11/2023	7.10	ND (<0.150) ND (<0.150)	2.4	360	650	1.4	_	12	181	ND(<0.039)	0.0195	2.4	-	0.40	6.0	10/11/2023	ND (<5.0)	2.5	38		
10/15 - 10/21	10/21/2023	ND (<0.63)	0.315	0.192	10/25/2023	7.06	ND (<0.150)	2.4	320	630	1.4	ND(<10)	5	75		0.16	1.1	-	0.40	5.6	10/18/2023	8.7	8.7	131		
10/29 - 11/4	11/4/2023	140 (40.03)	0.515	0.004	11/2/2023	7.14	ND (<0.150)	5.6	400	790	1.6	140(<10)	17	116	ND(<0.039)	0.0195	0.1		0.55	3.8	11/2/2023	ND (<5.0)	2.5	17		
11/5 - 11/11	11/1/2023				11/8/2023	6.90	ND (<0.150)	7.7	410	1000	1.6		26	397	ND(<0.039)	0.0195	0.1		0.33	3.0	11/8/2023	ND (<5.0)	2.5	38		
,,	,,				11/15/2023	6.99	(10.230)		.20		2.0			-5,	ND(<0.039)	0.0195					11/15/2023	,,	-	50	11/15/2023	
•		Į)			,, 2023	2.33									,						,,2023				,, 2023	

Note: Analytical responsibilities are performed by Eurofins Environment Testing (Eurofins) in Phoenix, Arizona, and hexavalent chromium is analyzed by Pace Analytical (Pace) in Las Vegas, Nevada, 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)

No - Not Sengifical or Not Analyzed

= Analyze detected; see column adjacent to right

- Total phosphonis olischarge limitation of 20 lbs/day applies between April 1 and September 30; no limits apply the rest of the year.

- Total phosphonis olischarge limitation of 30 lbs/day applies between April 1 and September 30; no limits apply the rest of the year.

¹ Pace Hexavalent Chromium sample taken 03/31/2023; original sample taken 03/29/2023 (L1599378) went over hold time and needed resampling.

² Average of 6.9 mg/L and 2.5 mg/L (< 5.0 mg/L); there was not enough sample to rerun in duplicate.

³ Pace Hexavalent Chromium sample taken 08/24/2023; original sample taken 08/23/2023 (11648967) needed resampling. Last Updated: November 17, 2023

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		4	Pumping out the water from PC-120 and PC-121 vaults. Replaced fuses as needed.
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		3	Repaired generator and parts for resin changeouts.
2		Athens Road Wells and Lift Station 3				
2.01		Athens Road Well Field, 9 wells	Running		2	Replaced the motor on ART-7A. Replaced the pump on ART-8A.
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				
3		Lift Station 2 and Transmission Pipelines	Ŭ			
3.01		Influent Pipeline	In operation			
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			3	Re-calibrated the level sensor on the wet well.
4		Interceptor Wells and Cr Treatment Plant				
4.01		IWF Well Field, 30 wells	Running			
4.02		Ferrous Sulfate Feed System	Running		3	New fittings were installed on the suction tubing.
4.03		Polymer Feed System	Running			-
4.04		Clarifier	In operation		3	
4.05		Filter Press	Running			
4.06		GWTP Effluent Tank	In operation			
4.07		Interceptor Booster Pump A	Running		2	Installed a new pump and motor.
4.08		Interceptor Booster Pump B				
4.09		Area In And Around GWTP	Running			
5		Equalization Area and GW-11 Pond				
5.01	PID10A	Pond GW-11	In operation		3	Pulled the SW corner and repaired the connections.
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	,			1	Replaced the damaged 8" piping on the EFF line.
5.06	PID10A		·		1	Replaced the discharge check valve.
5.07	PID10A	•				

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Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	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				
6		First Stage FBRs A, 1 & 2				
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			
6.07	PID02A		Running			
6.08	PID01A	First Stage Separator Tank - T2011			3	Removed the old transducer from the level control valve.
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				
6.13	PID07A	FBR A pH Feed Pump - P71A				
6.14	PID07A	FBR 1 pH Feed Pump - P711				
6.15	PID07A	FBR 2 pH Feed Pump - P712	Off			
6.16	_	FBR A Nutrient (Urea) Feed Pump - P72A				
6.17	PID07A	FBR 1 Nutrient (Urea) Feed Pump - P721	Off			
6.18	PID07A	FBR 2 Nutrient (Urea) Feed Pump - P722				
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				
6.21	PID15	FBR 2 Nutrient (Phos Acid) Feed Pump - P1522				
6.22	PID07B	FBR A Electron Donor Assembly Pump - P73A				
6.23	PID07B	FBR 1 Electron Donor Assembly Pump - P731				
6.24	PID07B	FBR 2 Electron Donor Assembly Pump - P732	Running		3	Rebuilt the head of the pump.
7		First Stage FBRs 3 & 4				
7.01	PID01B	FBR 3	Running			
7.02	PID01B		Running		3	Calibrated the feed valve.
7.03	PID02B	First Stage Separator Tank - T2012	Running			
7.04	PID01B	Media Return Pump - P2012	J			
7.05	PID01B	First Stage FBR Pump - P1013				
7.06	PID01B	First Stage FRB Pump - P1014				
7.07	PID01B	First Stage FBR Pump - P102A	Running			

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Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
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				
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				
8.12	PID07B	FBR 5 Electron Donor Assembly Pump - P735	Running			
8.13	PID07B	FBR 6 Electron Donor Assembly Pump - P736	Running		3	Replaced the fittings on the check valve of the injection point of the FBR.
9		Second Stage FBRs 7 & 8				
9.01	PID03B	FBR 7	Running		3	Cycled the feed valve.
9.02	PID03B	FBR 8	Running		3	Cycled the feed valve.
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				
9.09	PID07A	FBR 8 pH Feed Pump - P718	Off			
9.10	PID07A	FBR 7 Nutrient (Urea) Feed Pump - P727				
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			

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Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
10		Aeration and DAF System				
10.01	PID04	Aeration Tank	In operation		1	Opened the tank and inspected and removed solids.
10.02	PID04	Aeration Blower - B401			3	Replaced the belt and the air filter.
10.03	PID04		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				
10.13	PID05	DAF Float Pump - P502				
10.14	PID05	DAF Vessel - D551			2	Repaired the rakes and got the DF back online.
10.15	PID05	DAF Pressure Pump - P551				
10.16	PID05	DAF Float Pump - P552				
10.17	PID05	Screw Conveyer Drive				
10.18	PID05	Skimmer Drive	Running			
11		Pumping System (Old Effluent)				
11.01	PID06	Effluent Tank 601	In operation			
11.02	PID06	,	Running			Calibrated the flow control valve.
11.03	PID06	Effluent Pump - P602				
12		Sand Filter System				
12.01	PID17	Sand Filter				
12.02	PID17	Filter Reject Tank				
12.03	PID17	Filter Reject Pump - P1701A	_			
12.04	PID17	Filter Reject Pump - P1701B	Running			
13		Effluent Tank and Pumping				
13.01	PID10C	UV Effluent Tank				
13.02	PID10C	Effluent Booster Pump - P1302A				
13.03	PID10C	Effluent Booster Pump - P1302B				
13.04	PID10C	Area Around Effluent and North D-1	Running			
14		Solids Collection and Pressing System				
14.01	PID16					
14.02	PID16	3				
14.03	PID16					
14.04	PID09	Sludge Mixer	Running			

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Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
14.05	PID09	Filter Press Pump - P901	Running			
14.06	PID09	Filter Press Pump - P902			3	New pump installed.
14.07	PID09	West Press	Standby			
14.08	PID09	East Press				
14.09	PID09	Filtrate Tank				
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running			
		Chemical Systems				
15		Electron Donor System				
15.01	PID07B	Electron Donor Tank				
15.02	PID07B	Booster Pump P739A				
15.03	PID07B	Booster Pump P739B	•			
17	PID07C	Micro Nutrient System				
18	PID07C	Hydrogen Peroxide System				
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			
25	PID09	Polymer System - Solids Dewatering (2 tanks, 2 centrifugal pumps, mixer, volumetric feeder)	In operation			
		Utility Systems				
26		Compressed Air System				
26.01	PID08	West Compressor	Running			
26.02	PID08	East Compressor				
26.03	PID08	O2 Compressor				
26.04	PID08	Compressed Air Receiver Tank				
26.05	PID08	Air Dryer				
26.06	PID08	Oil Removal Filter				
26.07	PID08	Particulate Filter				
27	PID16	Oxygen System				
28		GWETS Plant Controls/ Siemens Controls				
29		Well Control System/ Allen Bradley Controls	In operation			

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- 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
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			

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