

То:	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:	December 20, 2023
Subject:	NERT – GWETS Operation Monthly Report – November 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 November 2023.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in November 2023. Flow from PC-115R, 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 November. The flow rate to the IX system averaged approximately 302 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 939 gpm. At the end of the month, the filled GW-11 Pond volume was at 44.77 million gallons (MG), which would allow 12.3 days of available additional storage in the event of an emergency FBR plant shutdown with continued well field pumping. The water volume stored in the GW-11 Pond increased since the end of October 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 2.0 mg/L for the month. The influent perchlorate concentration to the FBR plant averaged 50 mg/L for the month, with a maximum concentration of 53 mg/L. In comparison, the influent perchlorate concentration to the FBRs for the month of October 2023 averaged 44 mg/L, with a maximum concentration of 47 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 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 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 November 8, 2023 from 7:23pm to 8:06pm as a precautionary measure due to elevated levels of perchlorate in the FBRs. Adjustments were made to the process and the plant was brought back online. Approximately 45,000 gallons of water were added to the GW-11 pond.
- Influent diversion occurred on November 20, 2023 from 10:05am to 1:00pm due to scheduled maintenance on the 1302A VFD as well as the addition of sand to FBR 1. The maintenance was completed and the plant was brought back online. Approximately 183,000 gallons of water were added to the GW-11 Pond.
- Influent diversion occurred on November 27, 2023 from 8:18pm to November 28, 2023 at 2:25am due to a malfunctioning feed control valve. Troubleshooting was conducted, the valve was repaired, and the plant was brought back online. Approximately 375,000 gallons of water were added to the GW-11 Pond.
- Influent diversion occurred on November 28, 2023 from 8:41am to 9:58am due to a malfunctioning air compressor. Troubleshooting was conducted, the compressor function was resolved, and the plant was brought back online. Approximately 74,000 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. Treatment System Extension (TSE)

During November 2023, operations at the TSE plant were idled resulting from the TIMET infiltration galleries being unable to accept treated water. Throughout the month of November representatives of NERT and TIMET participated in multiple discussions regarding operations of the TSE and TIMET facilities. Operations are anticipated to resume in Q1 2024.

5. Effluent Filtration System (EFS)

During November 2023, the EFS operated normally and produced approximately 390,000 gallons of filtered GWETS effluent which supported the utility water requirements of GWETS operations.

6. Chromium Treatment Subsystem (CTS)

During November 2023, the CTS operated normally and treated approximately 2,405,000 gallons of groundwater, with approximately 5,000 gallons extracted from the Unit 4 Source Area In-Situ Bioremediation Treatability Study.

7. Spills

There was one reportable spill in the Month of November.

On November 22, 2023 at approximately 4:50 am the feed flow control valves for FBR 3 and 4 as well as the discharge/level control valve for Separator 2 malfunctioned causing the levels in FBR 3 and 4 and Separator 2 to rise above the tank tops causing an overflow. Approximately 20 gallons of partially treated water was released outside of containment. NDEP BWPC was notified in writing on December 1, 2023. All corrective actions identified in NERT's December 1, 2023 letter have been implemented.

8. Maintenance

- Major maintenance performed by ETI in the reporting month included:
 - I. Installed a new 7.5 hp motor on extraction well PC-116.
 - II. Installed new piping on extraction well E2-1.
 - III. Replaced the wire on the FBR1/2 pump skid to the HOA switches.
 - IV. Replaced the seal water solenoid valve and fuse on pump P-3015.
 - V. Installed a temporary light on the FBR pad.
 - VI. Installed a new flowmeter on AP Area extraction well E2-2.
 - VII. Loaded sand into FBR 1.
 - VIII. Pumped out the wells vaults due to power down at Lift Station 1 from PC-120 and PC-121.

- IX. Installed a rebuilt positioner and transducer on the level control valve for Separator 1.
- X. Replaced the pH meters on FBR 1 and FBR 4.
- Preventative maintenance performed by ETI in the reporting month included:
 - I. Inspected and blew out the Lift Station MCC's.
 - II. Calibrated the level control valve for tank T-601.
 - III. Greased all rotating equipment.
 - IV. Installed new in-line air filters for the level control valves.
 - V. Flushed the pH and ORP lines for the FBR's.
 - VI. Checked for correct RPM on the recycle pump motors.
 - VII. Topped off the water for the utility carts.
 - VIII. Greased the turbines and changed the oil at Lift Station 1.
 - IX. Inspected the leads in the PLC racks around the plant.
 - X. Cleared water from the airlines on the slam valves.

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

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. The replacement DAF was delivered in December 2023 and will be installed in March 2024.
 - II. Concrete Repair at various locations on FBR pad
 - 1. Scheduling work with selected contractor. Work is anticipated to be completed in February 2024.
- 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.

Tables

Operational Metrics

Table 1 - Flow Rate and Perchlorate and Chromium Concentrations

Nevada Environmental Response Trust I Groundwater Extraction and Treatment System I Monthly Stakeholder Metrics									
Location ID	Average Flow Rate (gpm) ⁴	Perchlorate (mg/L) ⁵	Chromium (TR) (mg/L) ⁵	Chromium(VI) (mg/L) ⁵					
SWF Total Extraction ¹	735 ³	4.4	ND	0.0012					
AWF Total Extraction ¹	410 ³	63	0.10	0.10					
IWF Total Extraction ¹	46 ³	357	6.0	5.3					
AP Area Total Extraction ¹	7.3 ³	575	0.18	0.19					
Chromium Treatment Subsystem Effluent ²	57	415	1.4	0.00031					
GW-11 Influent ¹	0.19	30	0.049	0.051					
FBR Influent ²	939	50	0.14	0.036					
Treatment System Extension Influent ^{2,3}	0.0	0.0	0.0	0.0					

Notes:

ND = Not detected above laboratory method detection limit (Cr(TR)= $2.5 \mu g/L$).

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: TSE offline from 11/01 to 11/30.

4: Sum of daily average flow for individual wells.

5: All concentrations reported are monthly flow weighted averages.

Table 2 - Perchlorate and Chromium Mass Flux

Nevada Environmental Response Tru	ist I 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	972	ND	0.26
AWF Total Extraction	9,288	14	14
IWF Total Extraction	5,930	100	88
AP Area Total Extraction	1,514	0.47	0.49
Chromium Treatment Subsystem Effluent	8,577	30	0.0064
GW-11 Influent	2.1	0.0034	0.0035
FBR Influent ¹	16,866	43	11
Treatment System Extension Influent ^{1,2}	0.0	0.0	0.0

Notes:

TR = Total Recoverable.

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

2: TSE offline from 11/01 to 11/30.

Figures

Operational Metrics

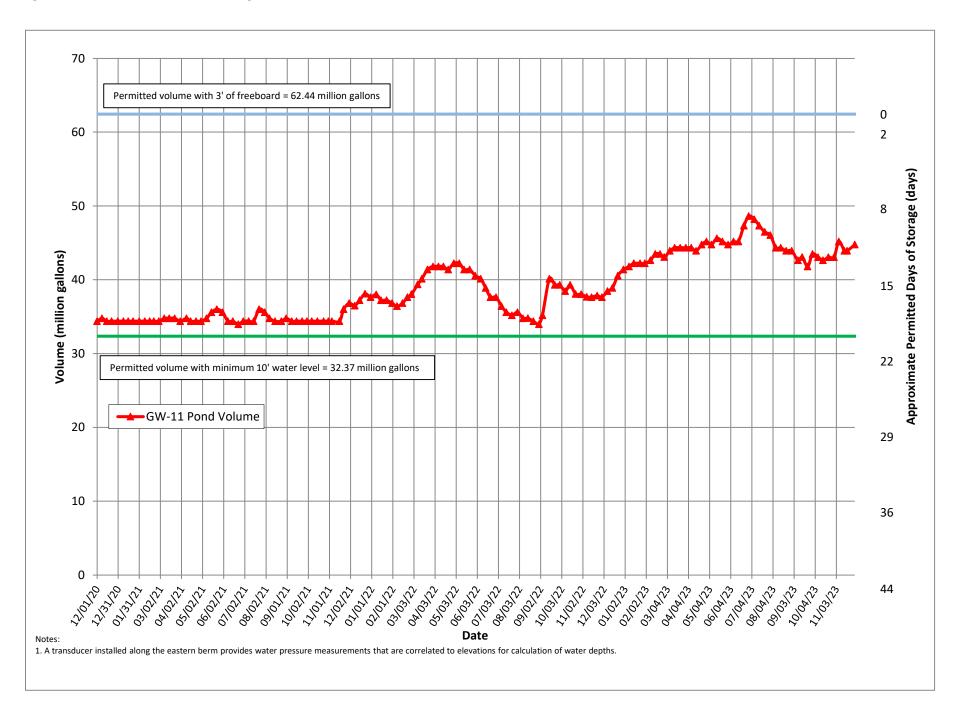
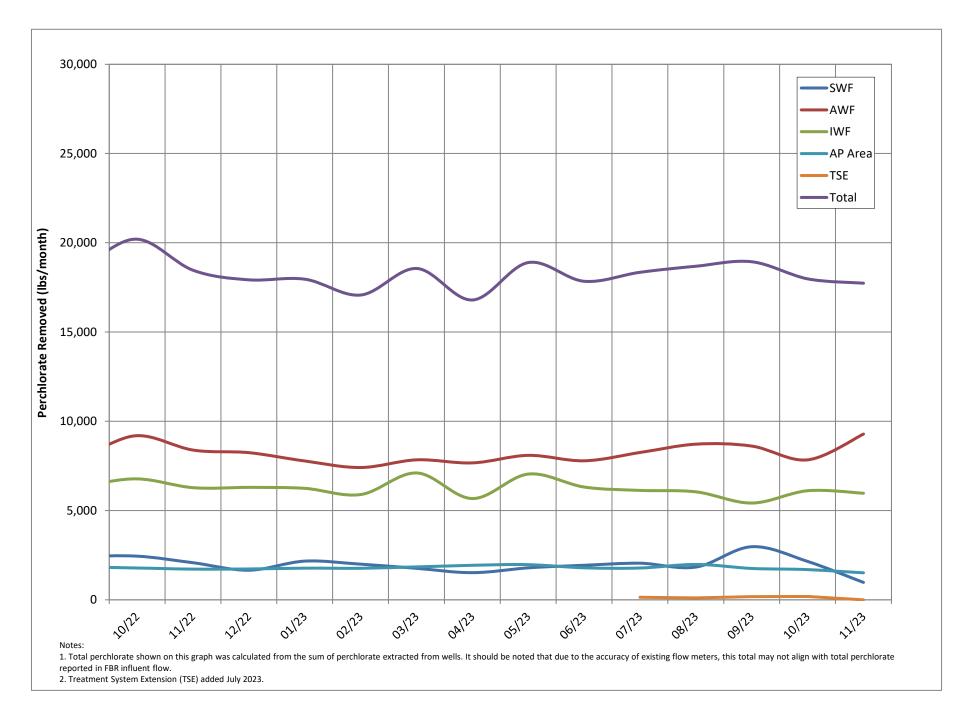


Figure 1 - GW-11 Pond Volume Through 11/30/2023





Attachment A

NPDES Tracking Sheet (Prepared by Ramboll)

										Tre	ated Effluent at Ou												
	Conti	nuous	Daily Samples, cor	nposited weekly							Weekly Grab S	amples							Weekly, o	collected separ	rately		Quarterly
	Flow	Rate	Perchlo	orate		рН	Hexavalent Chromium	Total Chromiun	n Manganese	Total Iron	Total Inorganic Nitrogen (TIN)	Total Suspen (TSS		Total Ammonia a	is N	Total Phosphore	us as P		во	DD ₅ (inhibited)			Total Dissolved Solids (TDS
	30-Day Avg. (MGD)	Daily Maximum (MGD)	30-Day Avg. (μg/L)	30-Day Avg. (Ibs/day)		Daily Min. Da (S.U.) (S.I	Daily Max.	Daily Max. (µg/L)	Daily Max. (µg/L)	Daily Max. (µg/L)	Daily Max. (mg/L)	Daily Average (mg/L)	30-Day Avg.	30-Day Avg. (Ibs/day)		30-Day Avg (Ibs/day)	-		30-Day Avg. (mg/L)	Daily Max. (mg/L)	30-Day Avg.		Daily Max. (mg/L)
	2.52	2.88	18	0.38		6.5 9.		100	5,000	10,000	20	135	(lbs/day) 2,839	20*		10*			25	40	(lbs/day) 525	t t	8,000
January 2022	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			ND (<5.0)	ND (<5.0)	36		
January 2023 February 2023	1.69	1.76	1.1	0.011		6.8 7.		41	340	1,100	1.3	22	310	4.2		7.2			ND (<5.0) ND (<5.0)	ND (<5.0)	35		3,900
March 2023	1.67	1.78	2.3	0.033		7.1 7.		13	320	1,100	1.3	20	270	3.6		5.6			ND (<5.0)	ND (<5.0)	35		-,
April 2023	1.63	1.75	1.6	0.022		6.75 7.		35	390	940	0.82	15	200	2.5		4.6			ND (<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			ND (<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			ND (<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			ND (<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			ND (<5.0)	ND (<5.0)	36		
October 2023	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			ND (<5.0)	ND (<5.0)	37		3,800
November 2023 (month to date)	1.61	1.91	ND (<1.6)	0.011		6.90 7.	19 ND (<0.150)	60	520	1,700	1.6	19	240	1.8		7.8			3.6	7.8	46		5,000
	Daily Grab Sample Dates	Composite 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/L	lbs/day	mg/L	lbs/day	Sample Date	mg,	/L	lbs/day S	ample 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
	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		i
	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		1
	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	280	970	0.75	20	282	0.15	2.1	0.49	6.9	2/15/2023	ND (<5.0)	2.5	35		
	2/19 - 2/25	2/25/2023	ND (<1.6) 0.8	0.011	2/22/2023	7.0	ND (<0.150)	25	260	1300	1.3	24	335	0.69	9.6	0.91	12.7	2/22/2023	ND (<5.0)	2.5		2/28/2023	3,900
	2/26 - 3/4	3/4/2023	ND (<1.6) 0.8	0.012	3/1/2023	7.2	ND (<0.150)	13	320	1100	0.22	12	174	0.20	2.9	0.49	7.1	3/1/2023	ND (<5.0)	2.5	36		
	3/5 - 3/11	3/11/2023	ND (<1.6) 0.8	0.011	3/8/2023	7.1	ND (<0.150)	9.5	300	620	1.0	14	196	0.23	3.2	0.30	4.2	3/8/2023	ND (<5.0)	2.5	35		1
	3/12 - 3/18	3/18/2023	ND (<1.6) 0.8	0.011	3/15/2023	7.2	ND (<0.150)	11	290	860	1.3	22	284	0.33	4.3	0.40	5.2	3/15/2023	ND (<5.0)	2.5	32		1
	3/19 - 3/25	3/25/2023	ND (<1.6) 0.8	0.011	3/22/2023	7.1	ND (<0.150)	5.3	240	710	0.71	21	298	0.18	2.6	0.33	4.7	3/22/2023	ND (<5.0)	2.5	35		1
	3/26 - 4/1	4/1/2023	8.4 8.4	0.120	3/29/2023	7.4	ND (<0.150) ¹	4.8	260	620	1.1	29	413	0.35	5.0	0.49	7.0	3/29/2023	ND (<5.0)	2.5	36		
	4/2 - 4/8	4/8/2023	ND (<1.6) 0.8	0.011	4/5/2023	6.8	ND (<0.150)	0.87	260	210	0.79	16	223	0.16	2.2	0.32	4.5	4/5/2023	ND (<5.0)	2.5	35		1
	4/9 - 4/15	4/15/2023	3.9 3.9	0.054	4/12/2023	7.0	ND (<0.150)	35	390	540	0.75	19	268	0.17	2.4	0.31	4.4	4/12/2023	ND (<5.0)	2.5	35		1
	4/16 - 4/22 4/23 - 4/29	4/22/2023	ND (<1.6) 0.8	0.011 0.011	4/19/2023	6.75 7.1	ND (<0.150)	6.6 6.9	260 290	370 940	0.82 0.82	18 ND(<10) 5	237 69	0.21	2.8 2.5	0.30 0.41	4.0 5.7	4/19/2023 4/26/2023	ND (<5.0) ND (<5.0)	2.5 2.5	33 35		1
	4/23 - 4/29 4/30 - 5/6	4/29/2023	ND (<1.6) 0.8	0.011	4/26/2023 5/3/2023	7.0	ND (<0.150)	4.4	360	280	1.1	15	205	0.18 0.34	4.6		6.3		. ,		35	+	
	5/7 - 5/13	5/6/2023 5/13/2023	ND (<1.6) 0.8 ND (<1.6) 0.8	0.011	5/10/2023	7.0	ND (<0.150) ND (<0.150)	20	280	1400	0.82	33	450	0.12	4.0	0.46 0.58	7.9	5/3/2023 5/10/2023	ND (<5.0) ND (<5.0)	2.5 2.5	34		1
	5/14 - 5/20	5/20/2023	ND (<1.6) 0.8	0.011	5/17/2023	7.0	ND (<0.150) ND (<0.150)	4.8	280	570	0.82	14	206	0.12	2.5	0.34	5.0	5/17/2023	ND (<5.0) ND (<5.0)	2.5		5/17/2023	3,800
	5/21 - 5/27	5/27/2023	ND (<1.6) 0.8	0.012	5/24/2023	7.0	ND (<0.150)	2.1	290	470	0.85	10	149	0.16	2.5	0.36	5.3	5/24/2023	ND (<5.0)	2.5	37	5/17/2025	3,800
	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	2.4	0.29	3.9	5/30/2023	ND (<5.0)	2.5	34		1
	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		1
	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		1
	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		1
	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		i
	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		i
	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		i
	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		i
	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	340	1100	0.71	16	232	0.054	0.8	0.41	5.9	9/13/2023	ND (<5.0)	2.5	36		i
	9/17 - 9/23	9/23/2023	ND (<1.6) 0.8	0.011	9/20/2023	7.22	ND (<0.150)	4.2	340	930	1.1	14	213	0.053	0.8	0.24	3.7	9/20/2023	ND (<5.0)	2.5	38		ı
	9/24 - 9/30	9/30/2023	ND (<0.63) 0.315	0.004	9/27/2023	7.18	ND (<0.150)	ND (<4.3)	360	820	0.93	25	324	ND(<0.039) 0.0195	0.3	0.68	8.8	9/27/2023	ND (<5.0)	2.5	32		
	10/1 - 10/7	10/7/2023	ND (<1.6) 0.8	0.012	10/4/2023	7.00	ND (<0.150)	8.1	330	1000	1.2	15	219	0.14	2.0	0.38	5.6	10/4/2023	ND (<5.0)	2.5	37	T	. –
	10/8 - 10/14	10/14/2023	ND (<0.63) 0.315	0.005	10/11/2023	7.10	ND (<0.150)	20	320	1300	0.74	20	294	ND(<0.039) 0.0195	0.29	0.66	9.7	10/11/2023	ND (<5.0)	2.5	37		
	10/15 - 10/21	10/21/2023	13 13	0.192	10/18/2023	7.06	ND (<0.150)	2.4	360	650	1.4	12	181	0.16	2.4	0.40	6.0	10/18/2023	ND (<5.0)	2.5	38		
	10/22 - 10/28	10/28/2023	ND (<0.63) 0.315	0.004	10/25/2023	7.06	ND (<0.150)	2.4	320	630	1.3	ND(<10) 5	75	0.076	1.1	0.37	5.6	10/25/2023	ND (<5.0)	2.5	38		
	10/29 - 11/4	11/4/2023	ND (<1.6) 0.8	0.009	11/2/2023	7.14	ND (<0.150)	5.6	400	790	1.6	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	11/11/2023		0.012	11/8/2023	6.90	ND (<0.150)	7.7	410	1000	1.6	26	397	ND(<0.039) 0.0195	0.3	0.14	2.1	11/8/2023	ND (<5.0)	2.5	38		
	11/12 - 11/18	11/18/2023	ND (<1.6) 0.8	0.012	11/15/2023	6.99	ND (<0.150)	4.5	330	910	0.96	11	156	ND(<0.039) 0.0195	0.3	0.39	5.5	11/15/2023	ND (<5.0)	2.5		11/15/2023	3,800
	11/19 - 11/25	11/25/2023	ND (<1.6) 0.8	0.010	11/21/2023	7.19	ND (<0.150)	10	520	1100	1.3	18	195	0.51	5.5	0.83	9.0	11/21/2023		2.5	27		
			1		11/29/2023	7.16	ND (<0.150)	60	490	1700	0.19	24	340	0.19	2.7	1.3	18.4	11/29/2023	7.8	7.8	111		

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)

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.

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 (L1648967) needed resampling. Last Updated: December 8, 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	Runnina		2	Pulled and replaced the motor on PC-116.
1.02		Lift Station 1 Lift Pump A				
1.03		Lift Station 1 Lift Pump B				
1.04	-	Area in and around Lift Station 1			4	Replaced A/C on the turbine cabinet.
2		Athens Road Wells and Lift Station 3	<u> </u>			
2.01		Athens Road Well Field, 9 wells	Running			
2.02		Lift Station 3 Lift Pump A	•			
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			
3.03		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			
4.02		Ferrous Sulfate Feed System	Running			
4.03		Polymer Feed System	Running		3	Replaced the pump with a new diaphragm pump.
4.04		Clarifier	In operation			
4.05		Filter Press	Running			
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		4	Installed a temporary light in the area.
5		Equalization Area and GW-11 Pond				
5.01	PID10A					
5.02	PID10A	Pond Water Pump - P101A				
5.03	PID10A	Pond Water Pump - P101B	,			
5.04	PID10A	Equalization Tanks				
5.05	PID10A	Area in and Around EQ	In operation			
5.06	PID10A	Raw Water Feed Pump - P102A				
5.07	PID10A	Raw Water Feed Pump - P102B				
5.08	PID10A	F-101 Filters	Running			

Criticality Codes

 Running - Unit is in operation
 1 = Critic

 Standby - Spare or duplicate, not currently in operation
 2 = Impor

 Maintenance - Out of service for maintenance
 3 = Mode

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

1= Critical - Cannot continue with operation until repairs made

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

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

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
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		1	The electrical was damaged in the conduit for the power supply for the HOA switches that power the pumps. New wire was pulled.
6.07	PID02A	FBR 2	Running		1	The electrical was damaged in the conduit for the power supply for the HOA switches that power the pumps. New wire was pulled.
6.08	PID01A	First Stage Separator Tank - T2011	Running		3	The positioner and transducer have been replaced.
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				
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				
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		U			
6.21	PID15					
6.22	PID07B		U U			
6.23	PID07B		Running			
6.24	PID07B	, , , , , , , , , , , , , , , , , , ,	Running			
7		First Stage FBRs 3 & 4				
7.01	PID01B		Running			
7.02	PID01B	FBR 4	Running			
7.03	PID02B	First Stage Separator Tank - T2012	Running		3	Rebuilt and replaced the positioner and the transducer on the level control valve.

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

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

Maintenance - Out of service for maintenance

Criticality Codes

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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

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
7.04	PID01B	Media Return Pump - P2012	v			
7.05	PID01B	First Stage FBR Pump - P1013	v			
7.06	PID01B	First Stage FRB Pump - P1014	Running			
7.07	PID01B	First Stage FBR Pump - P102A	-			
7.08	PID07A	FBR 3 pH Feed Pump - P713				
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		3	Cleared the injection line and replaced the check valve.
8	,	Second Stage FBRs 5 & 6				
8.01	PID03A	FBR 5	Running		3	Replaced the slam valve.
8.02	PID03A	FBR 6	Running			
8.03	PID03C	Second Stage Separator Tank - T3011	Running			
8.04	PID03A	Media Return Pump - P3011	v			
8.05	PID03A	Second Stage FBR Pump - P3015	Running		3	Replaced the solenoid for the seal water system.
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				
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			
9	93	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		3	Flushed the line forward to clear the large amount of solids in the line.
9.05	PID03B	Second Stage FBR Pump - P3017				
9.06	PID03B	Second Stage FBR Pump - P3018	-			
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			

Criticality Codes

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 1

 Standby - Spare or duplicate, not currently in operation
 2

 Maintenance - Out of service for maintenance
 3

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

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

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
9.10	PID07A	FBR 7 Nutrient (Urea) Feed Pump - P727				
9.11	PID07A	FBR 8 Nutrient (Urea) Feed Pump - P728				
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		4	Replaced the muffler on the air blowdown.
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		3	Swapped out the pump with a rebuilt pump.
10.17	PID05	Screw Conveyer Drive	Standby			
10.18	PID05	Skimmer Drive	Running			
11		Pumping System (Old Effluent)				
11.01	PID06	Effluent Tank 601	In operation			
11.02	PID06	Effluent Pump - P601	Running		3	Reconnected the leads on the motor.
11.03	PID06	Effluent Pump - P602				
12		Sand Filter System				
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			
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		1	Powered down the MCC and installed the new VFD on the motor.
13.04	PID10C	Area Around Effluent and North D-1	Running			
14		Solids Collection and Pressing System				

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Maintenance - Out of service for maintenance

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

Off - Not currently needed for use, but can be placed in service 4 = Low - Minor repairs that in no way alter the performance of the plant

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
14.01	PID16	Sludge Storage Tank				
14.02	PID16	Solids Storage Effluent Pump - P1601				
14.03	PID16	Solids Cond. Tank	In operation			
14.04	PID09	Sludge Mixer	Running			
14.05	PID09	Filter Press Pump - P901	Running		4	Rebuilding the spare pump.
14.06	PID09	Filter Press Pump - P902				
14.07	PID09	West Press	Standby			
14.08	PID09	East Press	Running			
14.09	PID09	Filtrate Tank	In operation			
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running		4	A new mechanical seal has been ordered for the pump.
		Chemical Systems				
15		Electron Donor System				
15.01	PID07B	Electron Donor Tank	In operation			
15.02	PID07B	Booster Pump P739A	v			
15.03	PID07B	Booster Pump P739B	Standby			
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	Running		2	Unit offline due to a failed motor starter. A new starter has been ordered.
26.03	PID08	O2 Compressor	Running			
26.04	PID08	Compressed Air Receiver Tank	In operation			
26.05	PID08	Air Dryer	Running			

Running - Unit is in operation

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Maintenance - Out of service for maintenance

Criticality Codes

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Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
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			

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