
To: Nevada Division of Environmental Protection
Nevada Environmental Response Trust

Cc: Nevada Environmental Response Trust Stakeholders

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

Date: September 9, 2024

Subject: NERT – GWETS Operation Monthly Report – July 2024

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 July 2024.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in July 2024. Flow from PC-118, PC-119, C-120, PC-121, and PC-133 were routed to the IX system, bypassing all flow meters associated with the FBR plant for July. The flow rate to the IX system averaged approximately 262 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 919 gpm. At the end of the month, the filled GW-11 Pond volume was at 34.8 million gallons (MG) would allow 19.2 days of 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 has decreased since the end of June 2024; Figure 1 in this report depicts the actual GW-11 pond volumes and additional storage available.

The influent perchlorate concentration in the IX system averaged 1.7 mg/L for the month. The influent perchlorate concentration in the FBR plant averaged 46.8 mg /L for the month, with a maximum concentration of 50 mg/L. The influent perchlorate concentration to the FBRs for June 2024 averaged 43 mg/L, with a maximum concentration of 65 mg/L.

During July, ETI continued implementing a preventative maintenance program to refurbish all front and back-side FBRs. Through this program, FBRs will be systematically emptied and dismantled to determine the extent of refurbishment. Additional information on this program is presented later in this report.

Enhanced Operational Metrics

Tables 1 and 2 summarize 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 summarizes 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, major repairs, and/or equipment replaced during this reporting period.

1. GW-11

There were no operational issues with GW-11 in July.

2. Biological Plant

There were influent/effluent diversions during the reporting period associated with general maintenance or FBR refurbishment 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 July 5, 2024, from 9:10 a.m. to 10:55 a.m. at Lift Station 2 and from 8:40 am to 10:53 am at Lift Station 3 due to an unplanned power outage caused by Nevada Energy. As a precaution, the plant was placed in recycling mode until the power was restored at the lift stations. Once lab testing was completed and effluent compliance was confirmed, the effluent was returned to the outfall.
- Influent diversion occurred on July 10, 2024, from 1:46 a.m. to 10:24 p.m. due to a communication loss at lift stations 1,2 & 3. As a precaution, the plant was placed in recycling mode until maintenance activities to restore communication with the lift stations were conducted and lab testing was completed. Once effluent compliance was confirmed, the effluent was returned to the outfall.
- Effluent diversion occurred on July 10, 2024, from 10:38 p.m. to 1:32 a.m. due to elevated levels of perchlorate in the effluent following a recent period when the FBRs were in recycling mode to facilitate maintenance activities. As a precaution, adjustments were made to the plant, lab testing was completed, effluent compliance was confirmed, and the effluent was returned to the outfall.
- Influent diversion occurred on July 21, 2024, from 10:45 pm to July 22, 2024, at 2:45 am due to a defective level control actuator. As a precaution, the plant was placed in recycling mode until the maintenance activities were conducted. Lab testing was completed, effluent compliance was confirmed, and the effluent was returned to the outfall.
- Effluent diversion occurred on July 23, 2024, from 8:24 p.m. to 1:48 a.m. due to elevated levels of perchlorate in the effluent following a recent period when the FBRs were in recycling mode to facilitate maintenance activities. As a precaution, adjustments were made to the plant, lab testing was completed, effluent compliance was confirmed, and the effluent was returned to the outfall.
- Influent diversion occurred on July 30, 2024, from 3:30 a.m. to 4:29 a.m. due to Tank-601 level control failure. As a precaution, the plant was placed in recycle mode until the maintenance activities were conducted, lab testing was completed, and effluent compliance was confirmed. The effluent was then returned to the outfall.

3. IX Treatment Plant

The concentration of perchlorate in shallow groundwater remains elevated in the western wells of the SWF. This increase is a result of the City of Henderson (City) discharging water to Birding Ponds 10 through 13 from late August through October 2023. The perchlorate concentrations in groundwater adjacent to the western leg of the SWF are expected to remain elevated for an extended period as a result of this activity.

4. Treatment System Extension (TSE)

In July 2024, operations at the TSE plant continued to be idled. In April, NERT advised ETI that discussions with TIMET have commenced to resume groundwater flow to the TSE. TIMET is in the process of hiring a new treatment plant operator. NERT developed a new version of the Cooperative Agreement to facilitate system restart and provided it to TIMET for their review. The timeline for restarting the system will be established during the negotiation of the updated Cooperative Agreement.

5. Effluent Filtration System (EFS)

During July 2024, the EFS operated normally and produced approximately 446,000 gallons of filtered GWETS effluent, which supported the utility water requirements of GWETS operations.

6. Chromium Treatment Subsystem (CTS)

During July 2024, the CTS operated normally and treated approximately 2,569,669 gallons of groundwater.

7. Spills

There were no reportable spills during July.

8. Maintenance

- Major maintenance performed by ETI in the reporting month included:
 - I. Repaired the refrigerated air dryer for the Kasner Compressor.
 - II. Repaired the separator #3 level control valve.
 - III. Replaced the electrical panel air conditioning unit at Lift Station #3.
 - IV. Repaired tank 601 level indicator.
 - V. A defective power supply for the IWF wells was replaced.
 - VI. The level transmitter on the Ultra Filtration EQ holding tank was replaced.

- Preventative maintenance performed by ETI in the reporting month included:
 - I. Tested and confirmed Lift Station communications with the main plant.
 - II. Inspected the combo valves and air relief valves associated with the influent and effluent pipelines.
 - III. Calibrated the ORP and pH sensors for all functioning FBRs.
 - IV. Inspected the influent and effluent pipeline.
 - V. Lubricated recycle pumps.
 - VI. Test FBR slam valve operation.

- FBR Refurbishment
 - VII. Completed internal repairs on FBR #3.

Attachment B summarizes all maintenance activities completed during the reporting period.

Facility Projects

1. 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 except for the replacement of the DAF has been completed. Specific details on in-progress items are provided below:
 - I. (WA 23-03) Dissolved Air Flotation (DAF) Vessel replacement
 1. The replacement DAF was delivered in December 2023 and will be installed in September 2024
 - II. Concrete Repair at various locations on the FBR pad
 2. Scheduling work with selected contractor. Work is anticipated to be completed in October 2024
3. Improved Biological Treatment Plant Efficiency – Consistent with Attachment D to the December 2021 GWETS Operation Monthly Report, Envirogen plans to take three 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. FBR A was placed into offline mode on April 13, 2022. After the ongoing FBR refurbishment is complete, the remaining two FBRs scheduled to be taken out of service will be addressed in the 3rd quarter of 2024.

Tables

Operational Metrics

Nevada Environmental Response Trust Groundwater Extraction and Treatment System 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	702	11	0.0045	0.0028
AWF Total Extraction ¹	396	53	0.14	0.13
IWF Total Extraction ¹	42	344	5.6	5.2
AP Area Total Extraction ¹	7.4	539	0.17	0.16
Chromium Treatment Subsystem Effluent ²	58	409	0.48	0.00031
GW-11 Influent ¹	0.16	31	0.070	0.065
FBR Influent ²	919	46	0.094	0.041
Treatment System Extension Influent ^{2,3}	0.0	0.0	0.0	0.0

Notes:

- 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 07/01 to 07/31.
- 4: Sum of daily average flow for individual wells.
- 5: 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) ¹	Chromium (TR) (lbs/month) ¹	Chromium (VI) (lbs/month) ¹
SWF Total Extraction	2,410	0.96	0.60
AWF Total Extraction	7,864	21	19
IWF Total Extraction	5,409	88	81
AP Area Total Extraction	1,482	0.48	0.44
Chromium Treatment Subsystem Effluent	8,774	10	0.0068
GW-11 Influent	31	0.070	0.065
FBR Influent ¹	15,721	32	14
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 07/01 to 07/31.

Figures

Operational Metrics

Figure 1 - GW-11 Pond Volume Through 07/31/2024

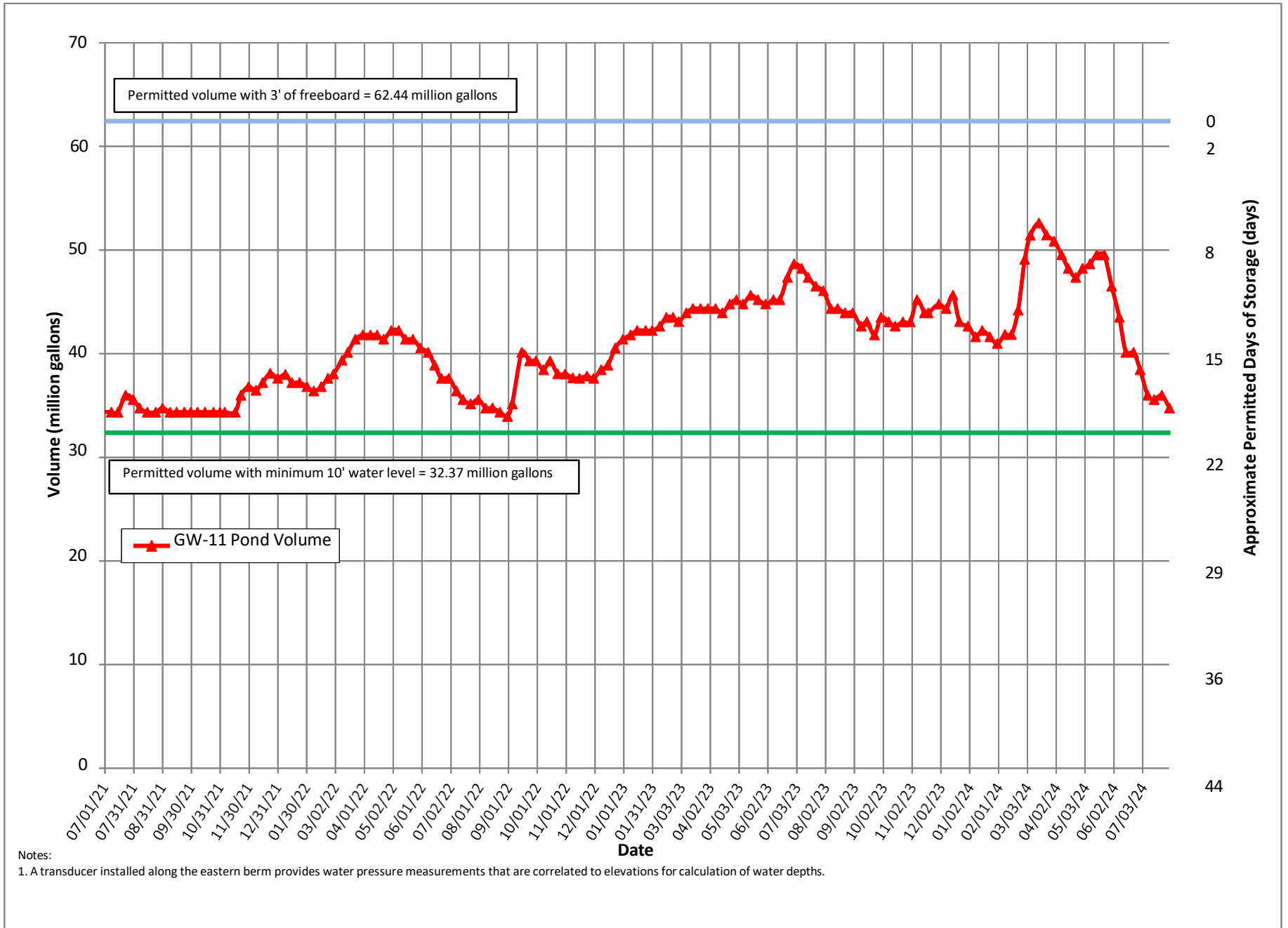
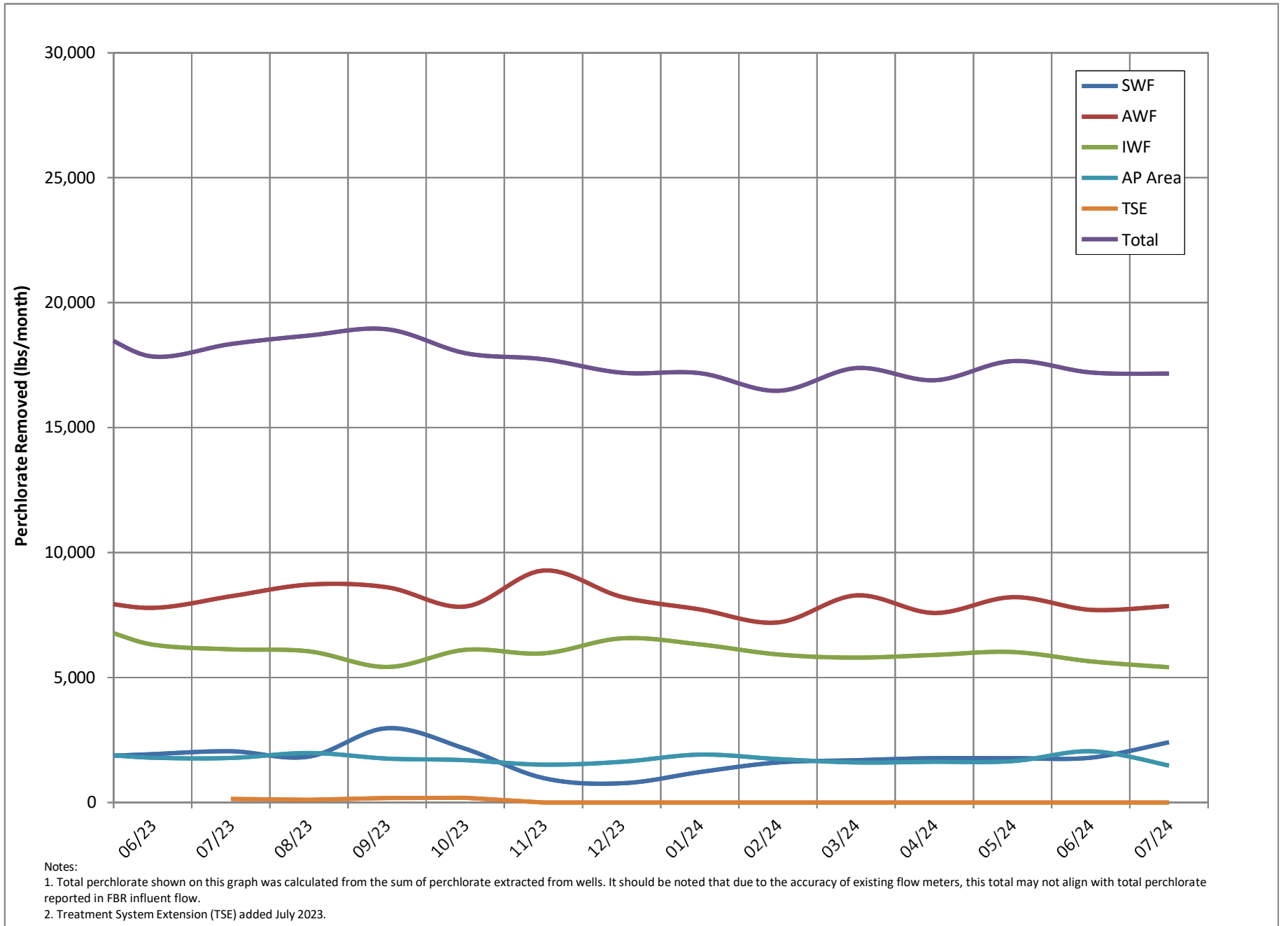


Figure 2 - Historical Perchlorate Mass Removed From Environment



Attachment A

NPDES Tracking Sheet (Prepared by Ramboll)

Attachment B

Equipment Tracking Form

Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²
Main Plant Equipment					
Seep Wells and Lift Station 1					
1.01		Seep Well Field, 9 wells	Running		
1.02		Lift Station 1 Lift Pump A	Running		
1.03		Lift Station 1 Lift Pump B	Standby		
1.04		Area in and around Lift Station	Running		
Athens Road Wells and Lift Station 3					
2.01		Athens Road Well Field, 9 wells	Running		
2.02		Lift Station 3 Lift Pump A	Standby		
2.03		Lift Station 3 Lift Pump B	Running		
2.04		Area in and around Lift Station	Running		
Lift Station 2 and Transmission Pipelines					
3.01		Influent Pipeline	Running		
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	Running		
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		
4.04		Clarifier	Running		
4.05		Filter Press	Running		
4.06		GWTP Effluent Tank	Running		
4.07		Interceptor Booster Pump A	Running		
4.08		Interceptor Booster Pump B	Standby		
4.09		Area In And Around GWTP	Running		
Equalization Area and GW-11 Pond					
5.01	PID10A	Pond GW-11	Running		
5.02	PID10A	Pond Water Pump - P101A	Running		
5.03	PID10A	Pond Water Pump - P101B	Standby		
5.04	PID10A	Equalization Tanks	Running		
5.05	PID10A	Area in and Around EQ	Running		
5.06	PID10A	Raw Water Feed Pump - P102A	Standby		
5.07	PID10A	Raw Water Feed Pump - P102B	Running		
5.08	PID10A	F-101 Filters	Running		
5.09	PID10B	Carbon Absorber - LGAC 201A	Offline		

Status Codes

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Critical Codes

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

Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²	
5.10	PID10E	Carbon Absorber - LGAC 201E	Offline			
5.11	PID10E	Carbon Absorber - LGAC 201C	Offline			
First Stage FBRs A, 1 & 2						
6.01	PID14	FBR A	Offline			
6.02	PID14	Separator Tank - 1401	Offline			
6.03	PID14	Media Return Pump - P 1401	Offline			
6.04	PID14	P1401A	Offline			
6.05	PID01A	P1401B	Offline			
6.06	PID01A	FBR	Running			
6.07	PID02A	FBR	Standby			
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	Running			
6.11	PID01A	First Stage FBR Pump - P1012	Running			
6.12	PID01A	First Stage FRB Pump - P101A	Standby			
6.13	PID07A	FBR A pH Feed Pump - P71A	Offline			
6.14	PID07A	FBR 1 pH Feed Pump - P711	Offline			
6.15	PID07A	FBR 2 pH Feed Pump - P712	Offline			
6.16	PID07A	FBR A Nutrient (Urea) Feed Pump - P72A	Offline			
6.17	PID07A	FBR 1 Nutrient (Urea) Feed Pump - P721	Offline			
6.18	PID07A	FBR 2 Nutrient (Urea) Feed Pump - P722	Offline			
6.19	PID15	FBR A Nutrient (Phos Acid) Feed Pump - P1520A	Offline			
6.20	PID15	FBR 1 Nutrient (Phos Acid) Feed Pump - P1521	Running			
6.21	PID15	FBR 2 Nutrient (Phos Acid) Feed Pump - P1522	Running			
6.22	PID07E	FBR A Electron Donor Assembly Pump - P73A	Running			
6.23	PID07E	FBR 1 Electron Donor Assembly Pump - P731	Running			
6.24	PID07E	FBR 2 Electron Donor Assembly Pump - P732	Running			
First Stage FBRs 3 & 4						
7.01	PID01E	FBR	Running			
7.02	PID01E	FBR	Running			
7.03	PID02E	First Stage Separator Tank - T2012	Running		3	Repaired Level Control Actuator
7.04	PID01E	Media Return Pump - P2012	Running			
7.05	PID01E	First Stage FBR Pump - P1013	Running			
7.06	PID01E	First Stage FRB Pump - P1014	Standby			
7.07	PID01E	First Stage FBR Pump - P102A	Running			
7.08	PID07A	FBR 3 pH Feed Pump - P713	Running			
7.09	PID07A	FBR 4 pH Feed Pump - P714	Running			

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Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²	
7.10	PID07A	FBR 3 Nutrient (Urea) Feed Pump - P723	Offline			
7.11	PID07A	FBR 4 Nutrient (Urea) Feed Pump - P724	Offline			
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	PID07E	FBR 3 Electron Donor Assembly Pump - P733	Running			
7.15	PID07E	FBR 4 Electron Donor Assembly Pump - P734	Running			
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	Running			
8.07	PID03A	Second Stage FBR Pump - P301A	Standby			
8.08	PID07A	FBR 5 pH Feed Pump - P715	Offline			
8.09	PID07A	FBR 6 pH Feed Pump - P716	Offline			
8.1	PID07A	FBR 5 Nutrient (Urea) Feed Pump - P725	Offline			
8.11	PID07A	FBR 6 Nutrient (Urea) Feed Pump - P726	Offline			
8.12	PID07E	FBR 5 Electron Donor Assembly Pump - P735	Running			
8.13	PID07E	FBR 6 Electron Donor Assembly Pump - P736	Running			
Second Stage FBRs 7 & 8						
9.01	PID03E	FBR 7	Running			
9.02	PID03E	FBR 8	Running			
9.03	PID03D	Second Stage Separator Tank - T3012	Running			
9.04	PID03E	Media Return Pump - P3012	Running			
9.05	PID03E	Second Stage FBR Pump - P3017	Maintenance		3	Pump and seal rebuild.
9.06	PID03E	Second Stage FBR Pump - P3018	Running			
9.07	PID03E	Second Stage FBR Pump - P302A	Standby			
9.08	PID07A	FBR 7 pH Feed Pump - P717	Offline			
9.09	PID07A	FBR 8 pH Feed Pump - P718	Offline			
9.10	PID07A	FBR 7 Nutrient (Urea) Feed Pump - P727	Offline			
9.11	PID07A	FBR 8 Nutrient (Urea) Feed Pump - P728	Offline			
9.12	PID07E	FBR 7 Electron Donor Assembly Pump - P737	Running			
9.13	PID07E	FBR 8 Electron Donor Assembly Pump - P738	Running			
10 Aeration and DAF System						
10.01	PID04	Aeration Tank	Running			
10.02	PID04	Aeration Blower - B401	Running			

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Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²	
10.03	PID04	Bio filter	Running			
10.04	PID04	Nutrient Solution	Running			
10.05	PID04	Bio filter Sump	Running			
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	Running			
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			
11		Pumping System (Old Effluent)				
11.01	PID06	Effluent Tank 601	Running		3	Repaired Tank Level Control
11.02	PID06	Effluent Pump - P601	Standby			
11.03	PID06	Effluent Pump - P602	Running			
12		Sand Filter System				
12.01	PID17	Sand Filter	Running			
12.02	PID17	Filter Reject Tank	Running			
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		3	Replaced pressure transmitter
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-	Running			
14		Solids Collection and Pressing System				
14.01	PID16	Sludge Storage Tank	Running			
14.02	PID16	Solids Storage Effluent Pump - P1601	Running			
14.03	PID16	Solids Cond. Tank	Running			
14.04	PID09	Sludge Mixer	Running			
14.05	PID09	Filter Press Pump - P901	Running			
14.06	PID09	Filter Press Pump - P902	Standby			
14.07	PID09	West Press	Standby			

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Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²	
14.08	PID09	East Press	Running			
14.09	PID09	Filtrate Tank	Running			
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running			
Chemical Systems						
Electron Donor System						
15.01	PID07E	Electron Donor Tank	Running			
15.02	PID07E	Booster Pump P739A	Running			
15.03	PID07E	Booster Pump P739B	Standby			
15	PID07C	Micro Nutrient System	Running			
15	PID07C	Hydrogen Peroxide System	Running			
15	PID07C	De-Foam System	Running			
20	PID15	Nutrient (Phosphoric Acid) System (Tank only - pumps included in FBRs)	Running			
20	PID07A	Nutrient (Urea) System (Tank only - pumps included in FBRs)	Running			
20	PID07A	pH System (Tank and effluent pH feed pump only - other pumps included in FBRs)	Running			
20	PID07C	Ferric Chloride	Running			
20	PID07E	Polymer Systems - DAF	Running			
20	PID09	Polymer System - Solids Dewatering (2 tanks, 2 centrifugal pumps, mixer, volumetric feeder)	Running			
Utility Systems						
Compressed Air System						
26.01	PID08	West Compressor	Running			
26.02	PID08	East Compressor	Maintenance			
26.03	PID08	O2 Compressor	Offline			
26.04	PID08	Compressed Air Receiver Tank	Running			
26.05	PID08	Air Dryer	Running		3	Repaired Air Dryer
26.06	PID08	Oil Removal Filter	Running			
26.07	PID08	Particulate Filter	Running			
27	PID16	Oxygen System	Offline			
28		GWETS Plant Controls/ Siemens Controls	Running			
28		Well Control System/ Allen Bradley Controls	Running		3	Replaced power supply
30		MCC FBR Pad	Running			
31		MCC in D-	Running			
32		MCC in EQ area	Running			

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Sub-System	P&ID	Description	Status ¹	Checked	Criticality ²	
Miscellaneous Systems						
33		Operations Office/Network	Running		2	Replaced defective hard drive on SCADA computer.
34		Laboratory Analyzers	Running			
35		Security Systems	Running			
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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- 3. Moderate – Work needs to be performed but plant can still operate with redundancy that is in place
- 4. Low – Minor repairs that in no way alter the performance of the plant