

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:	October 20, 2022
Subject:	NERT – GWETS Operation Monthly Report – September 2022

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 September 2022.

Summary of GWETS Operation

Envirogen Technologies, Inc. (ETI) mechanically operated the GWETS and ion exchange (IX) system normally in September 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 September. The flow rate to the IX system averaged approximately 268 gallons per minute (gpm). The flow rate to the FBR plant averaged approximately 850 gpm during September. At the end of the month, the filled GW-11 Pond volume was at 39.3 million gallons (MG), which would allow 16.1 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 August 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 1.9 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 August 2022 averaged 50 mg/L, with a maximum concentration of 58 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 August.

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 September 4, 2022 from 6:00am to 8:00am due to a malfunctioning level control valve at Separator 2. Maintenance was conducted on the valve and the plant was brought back online. Approximately 120,000 gallons of water were added to GW-11.
- Extraction well field shutdown of the Interceptor Well Field (IWF) on September 4, 2022 from 2:00pm to 3:23pm and again from 6:45pm to 7:04pm due to a malfunctioning VFD on the Influent pump. Maintenance was conducted and the well field was brought back online.
- Influent diversion occurred on September 6, 2022 from 8:37am to September 8, 2022 at 12:23pm due to electrical damage in the MCC as a result of a contractor error. The damage was identified and repaired and the plant was brought back online. Approximately 3,100,000 gallons of water were added to GW-11.
- Effluent diversion occurred on September 9, 2022 from 4:49pm to 7:04pm as a precautionary measure due to perchlorate results in the lab. Adjustments were made to the process, the effluent was tested in the lab, and the flow was returned to the outfall. Approximately 130,000 gallons of water were added to GW-11.
- Influent diversion occurred on September 19, 2022 from 6:06am to 8:39am due to a loss of power as a result of capital upgrades to the MCC power panel. Upgrades were completed, power was restored, and the plant was brought back online. Approximately 150,000 gallons of water were added to GW-11.
- Influent diversion occurred on September 28, 2022 from 7:25am to 12:03pm due to damaged electrical components as a result of a direct lightning strike at the EQ Area. Fuses were replaced and the plant was brought back online. Approximately 272,000 gallons of water were added to GW-11.
- Influent diversion occurred on September 29, 2022 from 8:26am to 9:28am due to maintenance efforts at the EQ Area. An electrical breaker that was damaged by the lightning was replaced. Maintenance was conducted and the plant was brought back online. Approximately 60,000 gallons of water were added to GW-11.

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 September.

5. Maintenance

- Major maintenance performed by ETI in the reporting month included:
 - I. Replaced numerous fuses after the lightning strike and replaced the breaker on P-102A.
 - II. Installed covers on the I-well flow meters.
 - III. Installed a new positioner on the level control valve for separator 2.
 - IV. Installed new belts on the South DAF sludge pump.
 - V. Loaded sand into FBR 1.
- Preventative maintenance performed by ETI in the reporting month included:
 - I. Inspected the electrical cabinets at the lift stations.
 - II. Flushed pH and ORP probes.
 - III. Graded the road near the railhead just North of the FBR pad.
 - IV. Greased the aeration blower.
 - V. Flushed the sand filter and cleaned out the weir boxes.

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

Facility Projects

- 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 October 2022 to complete the 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.
- 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).
- 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 inprogress 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
 - 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
 - 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. Expected delivery in September. Getting ready to run the new power line from the D-1 Building but this will need to be coordinated with system shutdown.

- VIII. (WA 21-09) Siemens controls upgrade
 - 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 October.
- 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 flowing startup of the CTS.
- GWETS Effluent Reuse Pilot A work authorization was finalized in April to procure and evaluate the performance of a membrane filtration system to produce GWETS utility water directly from plant effluent. The pilot study has now been completed and a report is under preparation.

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)	Perchlorate (mg/L) ⁴	Chromium (TR) (mg/L)⁴	Chromium(VI) (mg/L) ^₄					
SWF Total Extraction ¹	722 ³	9.2	0.0028	0.0038					
AWF Total Extraction ¹	446 ³	51	0.11	0.12					
IWF Total Extraction ¹	47 ³	379	5.6	5.7					
AP Area Total Extraction ¹	9.1 ³	561	0.17	0.18					
GWTP Effluent ²	61	398	0.32	0.00042					
GW-11 Influent ¹	62	57	0.12	0.042					
FBR Influent ²	852	54	0.08	0.024					

Notes:

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.

Table 2 - Perchlorate and Chromium Mass Flux

Nevada Environmental Response Tr	Nevada Environmental Response Trust I Groundwater Extraction and Treatment System I Monthly Stakeholder Metrics								
Location ID	Perchlorate (lbs/month) ¹	Chromium (TR) (lbs/month) ¹	Chromium (VI) (lbs/month) ¹						
SWF Total Extraction	2,389	0.72	1.0						
AWF Total Extraction	8,171	17	19						
IWF Total Extraction	6,416	94	96						
AP Area Total Extraction	1,837	0.55	0.57						
GWTP Effluent	8,704	6.9	0.0091						
GW-11 Influent	1,266	2.7	0.93						
FBR Influent ¹	16,580	24	5.8						

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

Operational Metrics

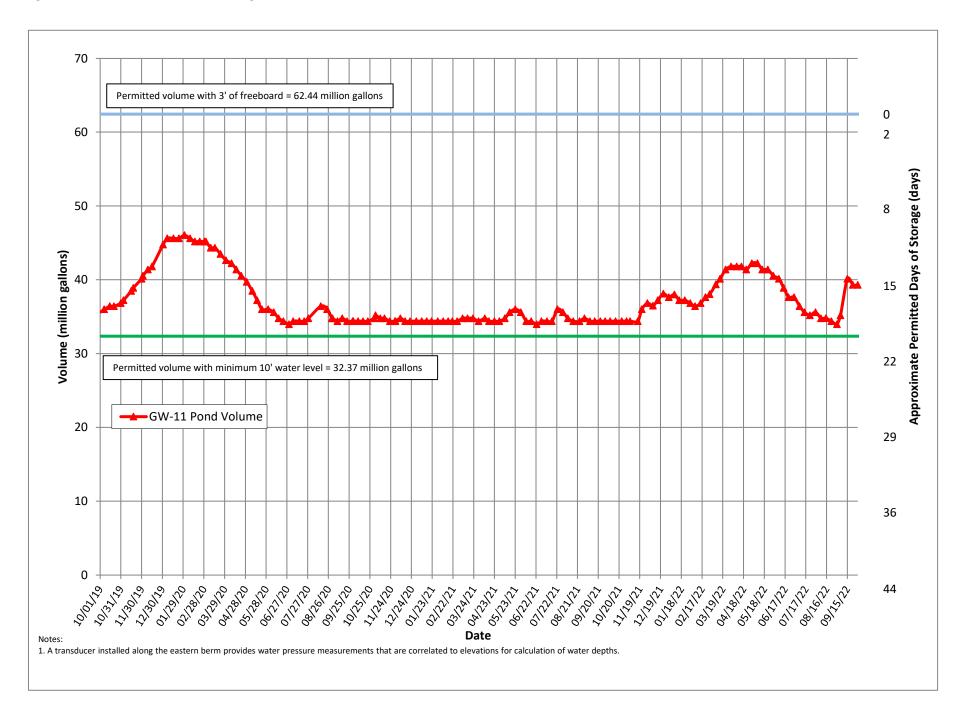
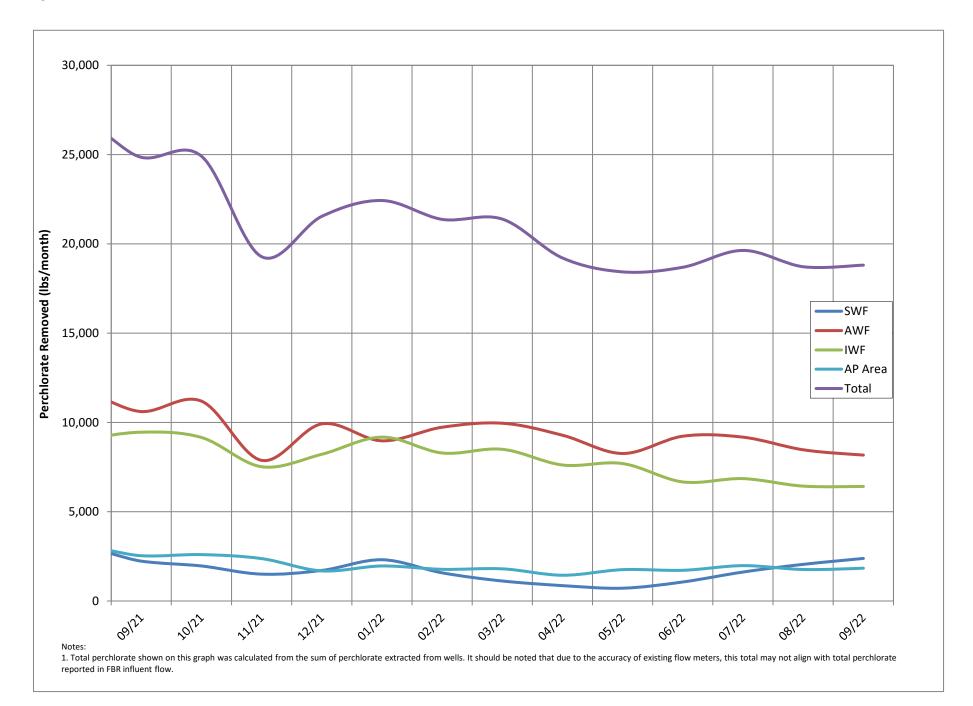


Figure 1 - GW-11 Pond Volume Through 09/30/2022

Figure Updated: 10/3/2022



Attachment A

NPDES Tracking Sheet (Prepared by Ramboll)

											Trea	ated Effluent at Out	tfall 001												
	Cont	nuous	Daily Samples, co	mposited weekly								Weekly Grab S	Samples								Weekly,	collected sep	parately		Quarter
								Henevelent				Tatal Incomentia	Total Suspe	ndad Salida											Total
	Flow	Rate	Perchl	orate		F	эΗ	Hexavalent Chromium	Total Chromium	Manganese	Total Iron	Total Inorganic Nitrogen (TIN)	-	SS)	Total Amm	onia as N	Total	Phosphoru	s as P		BC	DD ₅ (inhibited	d)		Dissolve
												introgen (int)		-1											Solids (TD
	30-Day Avg.	Daily Maximum	30-Day Avg.	30-Day Avg.		Daily Min.	Daily Max.	Daily Max.	Daily Max.	Daily Max.	Daily Max.	Daily Max.	Daily Averag	e ^{30-Day}	30-Day	Avg.		30-Day Avg.			30-Day Avg.	Daily Max.	30-Day		Daily Ma
	(MGD)	, (MGD)	(µg/L)	(lbs/day)		, (S.U.)	, (S.U.)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(mg/L)	(mg/L)	Avg.	(lbs/c	-		(lbs/day)			(mg/L)	(mg/L)	Avg.		(mg/L)
	2.52	2.88	18	0.38	1	6.5	9.0	10	100	5,000	10,000	20	135	(lbs/day) 2,839	20	*		10*		-	25	40	(lbs/day) 525	-	8,000
	2.52	2.00	10	0.56		0.5	5.0	10	100	3,000	10,000	20	155	2,035	20			10			23	-0	525	4	0,000
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	2.0	5		6.1			ND (<5.0)	ND (<5.0)	38		3,800
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.			8			ND (<5.0)	ND (<5.0)			_
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)			-
May 2022	1.74	1.82	ND (<0.31) 1.7	0.0022		6.5	7.5	ND (<0.50)	11	320	1,100	2.5	6 10	87	1.8			5.1 3.9			ND (<5.0)	ND (<5.0)			3,900
June 2022 July 2022	1.75 1.69	1.77 1.80	1.7	0.025		6.5 6.5	7.4 6.9	ND (<0.50) ND (<0.50)	14 19	270 280	890 930	2.2	10	140 150	1.1			4.3			ND (<5.0) ND (<5.0)	ND (<5.0) ND (<5.0)			
August 2022	1.66	1.73	0.5	0.0065		6.5	7.3	ND (<0.50)	8.9	360	1,100	1.6	12	170	1			5.2			ND (<5.0)	ND (<5.0)			4,100
September 2022 (month to date)	1.52	1.85	0.8	0.0112		6.5	7.7	0.6	50	630	1,200	1.4	13	170	2.3			4.4			ND (<5.0)	ND (<5.0)			
October (month to date)	1.74	1.76	NA	NA		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			NA			NA	NA	NA		_
	Daily Grab	Composite	μg/I	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	g/L	lbs/day	Sample	mg/L
	Sample Dates	Sample Date			1/3/2022	-	7.0		4.8				14 1					0.47	7.4	. 1/5/2022	ND (<5.0)	2.5		Date	-
	1/2 - 1/8 1/9 - 1/15	1/8/2022 1/15/2022	ND (<0.31) 0.16 0.61 J 0.61		1/3/2022		7.4	ND (<0.50) ND (<0.50)	2.2	11 38	910 600	0.35 0.41	14 1 ND(<10) 5			13 2.0 18 2.8		0.47	7.4 3.9	1/5/2022	ND (<5.0) ND (<5.0)	2.5	39 38		
	1/16 - 1/22	1/22/2022	0.52 J 0.52		1/17/2022		7.2	ND (<0.50)	12	55	1,100	0.64	. ,	9 301		16 2.5		0.73	12	1/19/2022	ND (<5.0)	2.5	39		
	1/23 - 1/29	1/29/2022	1.5 1.5	0.023	1/24/2022	7	7.0	ND (<0.50)	1.4	61	530	0.63	ND(<10) 5	5 78	0	10 1.6		0.34	5.3	1/26/2022	ND (<5.0)	2.5	39		
	1/30 - 2/5	2/5/2022	3.8 3.8	0.059	1/31/2022	7	7.2	ND (<0.50)	3.1	56	720	0.88	ND(<10) 5	5 78	0.	084 1.3		0.41	6.4	2/2/2022	ND (<5.0)	2.5	40		
	2/6 - 2/12	2/12/2022	ND (<0.31) 0.16		2/7/2022		7.5	ND (<0.50)	4.2 3.0	69	730	1.6		6 249		17 2.7		0.38	5.9	2/9/2022	ND (<5.0)	2.5	41	2/9/2022	3,800
	2/13 - 2/19	2/19/2022	3.9 3.9		2/14/2022		5.8	ND (<0.50)	2.1	69	840	0.94	13 1			25 3.7		0.40	5.9	2/16/2022	ND (<5.0)	2.5	36		
	2/20 -2/26 2/27 - 3/5	2/26/2022 3/5/2022	0.91 J 0.91 ND (<0.31) 0.16		2/22/2022 2/28/2022		7.3 7.2	ND (<0.50) ND (<0.50)	2.5 7.4	65 78	1,000 1,200	1.4 1.6	21 2 16 1	1 302 6 222		18 2.6 10 1.4		0.42 0.46	6.0 6.4	2/23/2022 3/2/2022	ND (<5.0) ND (<5.0)	2.5 2.5	36 34		
	3/6 - 3/12	3/12/2022	7.4 7.4		3/7/2022		7.2	ND (<0.50) ND (<0.50)	1.1	85	1,200	1.9	-	6 <u>222</u> 4 191		23 3.1		1.2	16	3/2/2022	ND (<5.0) ND (<5.0)	2.5	34		
	3/13 - 3/19	3/19/2022	ND (<0.31) 0.16		3/14/2022		5.5	ND (<0.50)	1.1	50	860	1.1	13 1			076 1.0		0.43+	5.7	3/16/2022	ND (<5.0)	2.5	37		
	3/20 - 3/26	3/26/2022	1.6 1.6		3/21/2022		7.1	ND (<0.50)	1.8	170	660	2.9	ND(<10) 5			053 0.79		0.40	5.9	3/23/2022	ND (<5.0)	2.5	37		
	3/27 - 4/2	4/2/2022	4.3 4.3		3/28/2022		5.7	ND (<0.50)	2.1	160	820	2.5		5 230		074 1.1		0.45	6.9	3/30/2022	ND (<5.0)	2.5	36		
	4/3 - 4/9	4/9/2022	4.3 4.3	0.064	4/4/2022	7	7.1	ND (<0.50)	1.2	190	590	2.4	ND(<10) 5	5 76	0.	099 1.5		0.29	4.4	4/6/2022	ND (<5.0)	2.5	38		
	4/10 - 4/16	4/16/2022	ND (<0.31) 0.16		4/11/2022		7.2	ND (<0.50)	1.5	180	540	2.5		0 147		078 1.1		0.25	3.7	4/13/2022	ND (<5.0)	2.5	36		
	4/17 - 4/23	4/23/2022	ND (<0.31) 0.16		4/18/2022		7.2	ND (<0.50)	14	200	520	0.52	ND(<10) 5			12 1.7		0.16	2.3	4/20/2022	ND (<5.0)	2.5	35		
	4/24 - 4/30 5/1 - 5/7	4/30/2022 5/7/2022	0.71 0.71 ND (<0.31) 0.16		4/25/2022 5/2/2022		7.1 7.3	ND (<0.50) ND (<0.50)	3.0 3.7	140 150	370 660	1.9	12 1 ND(<10) 5	2 167 5 69		<u>17 2.4</u> 11 1.5		0.27	3.8 4.3	4/27/2022 5/4/2022	ND (<5.0) ND (<5.0)	2.5 2.5	34 32	5/4/2022	3,900
	5/8 - 5/14	5/14/2022	ND (<0.31) 0.16		5/2/2022		7.5	ND (<0.50) ND (<0.50)	3.4	130	770	2.5	ND(<10) 5 ND(<10) 5			.11 1.5 .15 2.2		0.31	4.5 6.5	5/11/2022	ND (<5.0) ND (<5.0)	2.5	32	5/4/2022	5,900
	5/15 - 5/21	5/21/2022	ND (<0.31) 0.16		5/16/2022		5.5	ND (<0.50)	6.6	260	580	1.8	ND(<10)			10 1.5		0.33	4.9	5/18/2022	ND (<5.0)	2.5	36		
	5/22 - 5/28	5/28/2022	ND (<0.31) 0.16	0.0023	5/23/2022	6	5.7	ND (<0.50)	6.1	280	560	2.2	ND(<10) 5	5 73	0	13 1.9		0.25	3.7	5/25/2022	ND (<5.0)	2.5	36		
	5/29 - 6/4	6/4/2022	2.9 2.9		5/31/2022		7.3	ND (<0.50)	11	320	1,100	1.8		0 147		13 1.9		0.41	6.0	6/2/2022	ND (<5.0)	2.5	37		
	6/5 - 6/11	6/11/2022	2.8 2.8		6/6/2022		7.4	ND (<0.50)	5.0	270	580	2.2	ND(<10) 5	5 74		13 1.9		0.26	3.8	6/8/2022	ND (<5.0)	2.5	37		
	6/12 - 6/18	6/18/2022	2.6 2.6		6/13/2022 6/20/2022		7.2	ND (<0.50)	14 4.5	250	890 680	2.0	16 1 ND(<10) 5			095 1.4		0.31	4.5	6/15/2022	ND (<5.0) ND (<5.0)	2.5 2.5	37 36		
	6/19 - 6/25 6/26 - 7/2	6/25/2022 7/2/2022	ND (<0.31) 0.16 ND (<0.31) 0.16		6/20/2022 6/27/2022		5.5 5.5	ND (<0.50) ND (<0.50)	4.5	260 210	680 860	2.1 1.8		5 73 3 190		16 2.3 088 1.3		0.28 0.23	4.1 3.4	6/22/2022 6/29/2022	ND (<5.0) ND (<5.0)	2.5	36 37		
	7/3 - 7/9	7/9/2022	3.2 3.2	0.046	7/5/2022		5.9	ND (<0.50)	11	260	930	1.6	-	4 204		10 1.5		0.23	5.5	7/6/2022	ND (<5.0)	2.5	37		l
	7/10 - 7/16	7/16/2022	3.5 3.5	0.050	7/11/2022		5.5	ND (<0.50)	19	280	840	1.8	ND(<10) 5			085 1.2		0.20	2.9	7/13/2022	ND (<5.0)	2.5	36		
	7/17 - 7/23		ND (<0.31) 0.16		7/18/2022		5.6	ND (<0.50)	2.9	240	630	1.4	ND(<10) 5			12 1.7		0.32	4.6	7/20/2022	ND (<5.0)	2.5	35		
	7/24 - 7/30		ND (<0.31) 0.16		7/25/2022		5.8	ND (<0.50)	11	220	770	1.7	20 2			12 1.6		0.31	4.2	7/27/2022	ND (<5.0)	2.5	34		ļ
	7/31 - 8/6	8/6/2022	1.7 1.7 ND (<0.21) 0.16		8/1/2022		7.3	ND (<0.50)	8.1	320	1,100	1.6		0 285		15 2.1		0.39	5.6	8/3/2022	ND (<5.0)	2.5	36	0/0/2022	4 100
	8/7 - 8/13 8/14 - 8/20		ND (<0.31) 0.16 ND (<0.31) 0.16		8/8/2022 8/16/2022		5.7 5.5	ND (<0.50) ND (<0.50)	5.8 3.7	360 350	570 770	0.40 1.4	ND(<10) 5 14 1			10 1.3 095 1.4		0.26 0.36	3.4 5.1	8/10/2022 8/17/2022	ND (<5.0) ND (<5.0)	2.5 2.5	36 35	8/8/2022	4,100
	8/14 - 8/20 8/21 - 8/27		ND (<0.31) 0.16 ND (<0.31) 0.16		8/16/2022 8/22/2022		7.0	ND (<0.50) ND (<0.50)	8.9	280	890	0.34	14 1 16 1			095 1.4 079 1.1		0.36	5.1 6.6	8/17/2022 8/24/2022	ND (<5.0) ND (<5.0)	2.5	36		
	8/28 - 9/3		ND (<0.31) 0.16		8/29/2022		7.1	ND (<0.50)	4.2	330	670	1.1	ND(<10) 5			10 1.2		0.45	5.2	8/31/2022	ND (<5.0)	2.5	34		
	9/4 - 9/10		ND (<0.31) 0.16		9/9/2022		7.7	0.57	ND (<0.85)	630	ND<10	0.23	ND(<10) 5			12 0.4		0.096	0.3	9/9/2022	ND (<5.0)	2.5	9		l
	9/11 - 9/17	9/17/2022	2.1 2.1		9/13/2022	7	7.0	ND (<0.50)	38	390	1,200	0.94		0 291		041 0.6		0.34	5.0	9/14/2022	ND (<5.0)	2.5	37		
	9/18 - 9/24		ND (<0.31) 0.16		9/19/2022		7.3	NS	6.6	360	860	1.4		3 355		31 4.8		0.54	8.3	9/21/2022	ND (<5.0)	2.5	36		
	9/25 - 10/1	10/1/2022	NA NA	NA	9/21/2022		5.5	ND (<0.50)	50	350	810	1.1		3 188		15 2.2		0.27	3.9	9/29/2022 10/5/2022	NA	NA NA	NA	<u> </u>	
					9/26/2022		5.5	ND (<0.50)	7.9	400	630	1.2	ND(<10) 5	5 5		17 2.5		0.31	4.5		NA	NI A	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 IX was discharging.

Last Updated: October 7, 2022

WORKING TRACKING SPREADSHEET DRAFT - NOT TO BE SUBMITTED TO AGENCY

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		2	Replace the motor on PC-120.
1.02		Lift Station 1 Lift Pump A	Running		3	Change packing and install grease fitting on the turbine.
1.03		Lift Station 1 Lift Pump B	Standby			
1.04		Area in and around Lift Station 1	Running			
2		Athens Road Wells and Lift Station 3				
2.01		Athens Road Well Field, 9 wells	Running			
2.02		Lift Station 3 Lift Pump A	Standby			
2.03		Lift Station 3 Lift Pump B	Running			
2.04		Area in and around Lift Station 3	Running			
3		Lift Station 2 and Transmission Pipelines				
3.01		Influent Pipeline				
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		3	Replace the motor on I-I.
4.02		Ferrous Sulfate Feed System	Running			
4.03		Polymer Feed System	Running			
4.04		Clarifier	In operation			
4.05		Filter Press	Running		2	Install new hydraulic pump on the press.
4.06		GWTP Effluent Tank	In operation			
4.07		Interceptor Booster Pump A	Running		2	Installed a new breaker on the pump electrical leads.
4.08		Interceptor Booster Pump B	Standby			
4.09		Area In And Around GWTP	Running			
5		Equalization Area and GW-11 Pond				
5.01	PID10A					
5.02	PID10A					
5.03	PID10A					
5.04	PID10A					
5.05	PID10A		In operation			
5.06	PID10A					
5.07	PID10A					
5.08	PID10A		Running			
5.09	PID10B	Carbon Absorber - LGAC 201A				

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

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
5.10	PID10B	Carbon Absorber - LGAC 201B				
5.11	PID10B					
6		First Stage FBRs A, 1 & 2				
6.01	PID14					EQUIPMENT OFFLINE
6.02	PID14	,				EQUIPMENT OFFLINE
6.03	PID14	Media Return Pump - P 1401				EQUIPMENT OFFLINE
6.04	PID14					EQUIPMENT OFFLINE
6.05	PID01A					EQUIPMENT OFFLINE
6.06	PID01A		Running		1	Loaded sand into the FBR.
6.07	PID02A		Running			
6.08	PID01A	8 1	-			
6.09	PID01A	1	-		3	Rebuilt the pump.
6.10	PID01A		Standby			
6.11	PID01A	š				
6.12	PID01A	ş ;				
6.13	PID07A					
6.14	PID07A					
6.15	PID07A	, , ,				
6.16	PID07A	FBR A Nutrient (Urea) Feed Pump - P72A	Off			
6.17	PID07A					
6.18	PID07A	FBR 2 Nutrient (Urea) Feed Pump - P722	Off			
6.19	PID15		Running			Equipment offline
6.20	PID15					
6.21	PID15					
6.22	PID07B	, ,	U U			
6.23	PID07B		U U			
6.24	PID07B	FBR 2 Electron Donor Assembly Pump - P732	Running			
7		First Stage FBRs 3 & 4				
7.01	PID01B		Running			
7.02	PID01B		Running			
7.03	PID02B	ů l			2	Installed a new positioner on the level control valve.
7.04	PID01B	· · · · · · · · · · · · · · · · · · ·	-			
7.05	PID01B	ÿ 1				
7.06	PID01B	š	-			
7.07	PID01B		-			
7.08	PID07A	1 1				
7.09	PID07A	FBR 4 pH Feed Pump - P714	Running			

Running - Unit is in operation

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

Criticality Codes

1= Critical - Cannot continue with operation until repairs made

Standby - Spare or duplicate, not currently in operation 2 = Important - Can still operate safely and in compliance with permits, but risks are increased Maintenance - Out of service for maintenance

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
7.10	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		3	Replaced the pump head.
7.13	PID15	FBR 4 Nutrient (Phos Acid) Feed Pump - P1524	U U			
7.14	PID07B	FBR 3 Electron Donor Assembly Pump - P733	U U			
7.15	PID07B	FBR 4 Electron Donor Assembly Pump - P734	Running			
8		Second Stage FBRs 5 & 6				
8.01	PID03A		Running			
8.02	PID03A		Running			
8.03	PID03C	Second Stage Separator Tank - T3011				
8.04	PID03A	Media Return Pump - P3011	•			
8.05	PID03A	Second Stage FBR Pump - P3015	-			
8.06	PID03A	Second Stage FBR Pump - P3016				
8.07	PID03A	Second Stage FBR Pump - P301A				
8.08	PID07A	FBR 5 pH Feed Pump - P715				
8.09	PID07A	FBR 6 pH Feed Pump - P716				
8.1	PID07A	FBR 5 Nutrient (Urea) Feed Pump - P725				
8.11	PID07A	FBR 6 Nutrient (Urea) Feed Pump - P726				
8.12	PID07B	FBR 5 Electron Donor Assembly Pump - P735	0			
8.13	PID07B	FBR 6 Electron Donor Assembly Pump - P736	Running			
9		Second Stage FBRs 7 & 8				
9.01	PID03B		Running			
9.02	PID03B		Running			
9.03	PID03D	Second Stage Separator Tank - T3012				
9.04	PID03B	Media Return Pump - P3012	U U			
9.05	PID03B	Second Stage FBR Pump - P3017	•			
9.06	PID03B	Second Stage FBR Pump - P3018				
9.07	PID03B	Second Stage FBR Pump - P302A	U U			
9.08	PID07A	FBR 7 pH Feed Pump - P717				
9.09	PID07A	FBR 8 pH Feed Pump - P718				
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	-			
9.13	PID07B	FBR 8 Electron Donor Assembly Pump - P738	Running			
10		Aeration and DAF System				
10.01	PID04	Aeration Tank				
10.02	PID04	Aeration Blower - B401	Running			

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Criticality Codes

1= Critical - Cannot continue with operation until repairs made

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

Maintenance - Out of service for maintenance 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

Sub- System	P&ID	Description	Status ¹	Checked	Criticality ²	Notes
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				
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		4	Replaced the belts on the pump
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	In operation			
11.02	PID06	Effluent Pump - P601	Running			
11.03	PID06	Effluent Pump - P602				
12		Sand Filter System				
12.01	PID17	Sand Filter				
12.02	PID17	Filter Reject Tank	In operation		3	Rebuilt an airlift
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					
13.04	PID10C	Area Around Effluent and North D-1	Running		4	Ongoing assistance with the membrane pilot.
14		Solids Collection and Pressing System				
14.01	PID16	Sludge Storage Tank	In operation			
14.02	PID16	Solids Storage Effluent Pump - P1601	Running			
14.03	PID16	Solids Cond. Tank				
14.04	PID09	Sludge Mixer	Running			
14.05	PID09	Filter Press Pump - P901				
14.06	PID09	Filter Press Pump - P902	-			
14.07	PID09	West Press	Standby			

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

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
14.08	PID09	East Press	Running			
14.09	PID09	Filtrate Tank	In operation			
14.10	PID09	Filtrate Tank Effluent (recycle) Pump - P903	Running			
		Chemical Systems				
15		Electron Donor System				
15.01	PID07B					
15.02	PID07B	1	v			
15.03	PID07B	1	Standby			
17	PID07C					
18	PID07C					
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					
26.03	PID08	,	-			
26.04	PID08	· ·	In operation			
26.05	PID08	,	•			
26.06	PID08					
26.07	PID08					
27	PID16					
28		GWETS Plant Controls/ Siemens Controls				
29		Well Control System/ Allen Bradley Controls				
30		MCC FBR Pad				
31		MCC in D-1				
32		MCC in EQ area	In operation			

Running - Unit is in operation

Standby - Spare or duplicate, not currently in operation

Criticality Codes

1= Critical - Cannot continue with operation until repairs made

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

 Maintenance - Out of service for maintenance
 3 = Moderate - Work nee

 Off - Not currently needed for use, but can be placed in service
 4 = Low - Minor repairs t

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
		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			

Running - Unit is in operation Standby - Spare or duplicate, not currently in operation Maintenance - Out of service for maintenance Off - Not currently needed for use, but can be placed in service Criticality Codes

1= Critical - Cannot continue with operation until repairs made

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

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

Attachment C

Facility Repair/Replacement Project Status

GWETS AMENDMENT 8 REPAIR/REPLACEMENT STATUS PREPARED BY NEVADA ENVIRONMENTAL RESPONSE TRUST

	ITEM	RESOLUTION	WORK AUTHORIZATION	STATUS AS OF 9/30/22
1	Dissolved Air Floatation (DAF) Vessels	ETI to pilot an alternate technology (AquaDisk filters) and make a recommendation	ETI WA 22-01 \$58,203 Executed 1/13/22	Pilot is complete and draft final report submitted. Working on proposal for a new DAF, waiting for contractor proposals.
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 Executed 12/21	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 by November.
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 Executed 11/21	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 Executed 12/21	Work started but delayed due to City flooding the seep area. Lift Station 1. MCC & major equipment has been delivered. Awaiting contractor scheduling but we anticipate completing the work in early November.
8	IWF Wiring	ETI to replace as required	ETI WA 21-08 \$436,481 Executed 12/21	New wire has been installed at the wells. Delivery of the new starters has been delayed and are scheduled to ship in October. Getting ready to run the new power line from the D-1 Building.
9	FBR Skid Equipment Replacements	ETI to replace what is immediately required in lieu of complete replacements	ETI WA 22-04 \$142,061 Executed 2/4/22	Equipment is onsite, preparing project closeout.
10	Influent / Effluent Pump Motors	ETI to procure additional motors for more frequent rotation	ETI WA 22-03 \$31,800 Executed 2/4/22	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 Executed 3/7/22	Installation delayed due to an issue with the seals. Work has been rescheduled to early November.

GWETS AMENDMENT 8 REPAIR/REPLACEMENT STATUS PREPARED BY NEVADA ENVIRONMENTAL RESPONSE TRUST

	ITEM	RESOLUTION	WORK AUTHORIZATION	STATUS AS OF 9/30/22
12	Replacement of Safety Showers	ETI to replace safety shower system in batches over ~2 years	ETI WA 21-05 \$131,899 Executed 11/21	Onsite work is complete, preparing project to close out.
13	East Air Compressor	ETI to replace as required	ETI WA 21-02 \$29,784 Executed 10/21	Project complete.
14	pH and ORP Probes	ETI to replace certain probes as required throughout FBR plant	ETI WA 21-07 \$108,893 Executed 11/21	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 10/31/22. 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 Executed 11/21	All spare parts are onsite. Computers are onsite, awaiting programming changes and installation scheduled in September. Work expected to be completed by end of October 2022.
18	Sludge Pump and Sludge Bins	ETI to replace as required	ETI WA 22-02 \$102,183 Executed 2/7/22	Equipment is onsite, preparing project closeout.
19	Lift Station Repairs	ETI to replace as required	ETI WA 22-05 \$20,738 Executed 2/4/22	Equipment is onsite, preparing project closeout.
20	D-1 Asbestos Evaluation	NERT to complete an asbestos survey	TT WA 21-12 \$7,400 Executed 11/21	Survey complete. Report complete and forwarded to ETI. Project complete.