Monthly Report of the Operations & Maintenance Activities

Claremont Polychemical Operable Unit 5

Groundwater Treatment System

Old Bethpage, New York

October 2020

NYSDEC Standby Engineering Contract
Work Assignment #D0076025-28

Prepared for
NYS Department of Environmental Conservation
625 Broadway
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NEW YORK STATE OF OPPORTUNITY
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ACRONYMS AND ABBREVIATIONS

AS	Air Stripper
ASF	Air Stripper feed
BSP	Bethpage State Park (Black Golf Course)
CPC	Claremont Polychemical
CSE	Confined Space Entry
DOSR	Daily Operations Summary Report
DTB	Depth to bottom
DTW	Depth to water
EAR	Environmental Assessment and Remediation
EFF	Effluent
EON	EON Products, Inc.
Fed Ex	Federal Express
GPD	Gallons per day
GPM	Gallons per minute
GW	Groundwater
GWTS	Groundwater extraction, treatment, and reinjection system
HCl	Hydrochloric acid
HDR	Henningson, Durham & Richardson Architecture and Engineering, P.C.
HHLA	High-High Level Alarm
HMI	Human Machine Interface
INF	Influent
LOTO	Lock-out, tag-out
MW	Monitoring well
NOV	Notice of Violation
NCDPW	Nassau County Department of Public Works
NYSDEC	New York State Department of Environmental Conservation
O&M	Operation and maintenance
OBL	Old Bethpage Landfill
OFP&C	NYS Office of Fire Prevention & Control
OU4	Operable Unit 4
OU5	Operable Unit 5
PET	Peter Takach
PDB	Passive Diffusion Bags
PD	Plant discharge
PFOA	Perfluorooctanoic Acid and related perfluorinated alkyl substances
PFOS	Perfluorooctanesulfonic Acid
PFF	Pressure Filter Feed
PID	Photo ionization detector
PSEG	Public Service Enterprise Group, electrical power supplier
PW	Process water
RAP	Remedial Action Plan
RW	Recovery well, process well
SOP	Standard Operating Procedure
SMP	Site Management Plan
SSHP	Site Safety and Health Plan
SU	Standard pH units
TA	TestAmerica Laboratory
TOB	Town of Oyster Bay
UPS	United Parcel Service
VOCs	Volatile organic compounds
VPB	Vertical profile borings

1 OPERATION AND MAINTENANCE ACTIVITIES

Henningson, Durham & Richardson Architecture and Engineering, P.C. (HDR) continued the daily operation and maintenance (O&M) of the Claremont Polychemical Superfund Site Groundwater Treatment System (GWTS) Operable Unit 5 (OU5) during the month of October in 2020. This report covers the operation and maintenance activities for the system during the period defined as beginning at 0830 hours, October 1, 2020 through 0830 hours, November 1, 2020. O&M conducted during this reporting period was guided by the site O&M Manual.

The GWTS – treatment plant, grounds, and well systems - were maintained for the 31 days in this reporting period during which the treatment system was shut down for 52 minutes due to problem with the ASF pump controls.

Readings of the key plant process parameters are normally recorded each work day. If the plant is not occupied, the system is monitored remotely. These readings and the Human Machine Interface (HMI) flow trend lines are used to monitor the system's performance and condition. Selected readings are recorded in the daily database which is an electronic file maintained in the monthly operating documents folder.

The treatment process control and alarm systems are functional. Pressure Filter Feed (PFF) Pump 1, is off line with mechanical issues. The recovery well pumps and the process pumps are operated in the automatic mode and are remotely controlled and monitored.

1.1 DAILY OPERATIONS SUMMARY REPORTS

The GWTS's daily operations and maintenance activities, project tasks, and observations during this period are briefly described in the Daily Operations Summary Report (DOSR). The DOSR is based in part on the treatment system's daily operating worksheets and logs which include:

Daily Operating Log – flow readings and calculations (Form-01)
Daily Process Data Sheet – point process readings (Form-30)
Daily Safety and Site Inspection – plant condition checklist (Form-02)
Daily Plant Activity Notes – plant manager's daily summary (Form-03)
HDR Sign-In Sheet – HDR employee on-site hours (Form-15)
Log Book CPC 5-7– plant operator's daily log book
Daily Database – daily process readings (10 October 20 Database.xlsx)
NYSDEC Log-in Sheet – Entry/Exit Log with COVID-19 Acknowledgement

1.2 SUMMARY OF MAINTENANCE ACTIVITIES

The operation and maintenance of the treatment system, facility, and associated equipment is performed in accordance with the site O&M Manual. These tasks and inspections incorporate the equipment manufacturers' recommendations, operations experience, and good engineering and maintenance practices. A detailed accounting of the October activities is further provided in the plant operator's daily log book.

Maintenance and project activities undertaken during the October period included:

- Routine and general maintenance tasks were conducted at the plant, on the grounds, and in the well fields.
- The flex in the truck DS door was fixed
- The plant and office areas were frequently cleaned and sanitized
- The side window of the truck was replaced
- An egress path was cleared around the OU4 building
- The plant heating systems were tested
- The locks were changed at the MW-6 cluster, then MW-8s and MW-10s
- Another downed tree was removed from the MW-6 access path
- The vault for the OU4 backflow preventer devices was cleared
- A path was cleared to MW-10D
- The SUNY wellfield was inspected
- Intrinsic receptacles on the north and south plant walls were replaced with regular outlets
- The plant discharge flow to basin 33 was stopped and directed to Basin 1
- The OU4 roof penetration was repaired and the gutters cleaned
- The OU4 comprehensive site and safety inspections were completed.
- The CPC site was inspected
- The PD sampling valve at P3 was replaced
- The floor sump at OU4 was pumped out
- The accumulated metal scrap was sorted and disposed of it
- The process equipment function tests were completed
- The OU5 comprehensive site and safety inspections were completed
- The truck was cleaned
- The pressure washer recoil starter was rewound.
- The PM on the process pump motors was completed

1.3 MAINTENANCE LOGS

The following operating logbooks are currently in use and maintained at OU5:

- CL-18 OU-4 Log (truck)
- CL-43 General Field Support Log (truck)
- CL-47 Misc. Projects Field Notebook (PET)
- CPC 5-4 Project Support Log Book (site)
- CPC 5-7 Site Supervisor's Daily Log Book (PET)

The completed log books associated with the project have been scanned, all are in storage at OU5, and are available for review.

2 TECHNICAL SUPPORT ACTIVITIES

2.1 HDR Personnel

- HDR maintained the system throughout the period.
- 10/7, Jennifer Rhee was in to go over OFP&C NOVs. She returned 10/21 and 10/27 for more review.
- 10/9, Jennifer Rhee in to read the transducers.
- 10/22, Andrew Wadden to read and collect the transducers

2.2 NYSDEC Personnel, sub-contractors and other visitors

- 10/7, Lifetime Commercial Roofers were at OU4 to quote on the roof repair
- 10/8, Four Seasons Roofers were at OU4 to quote on the roof repair
- 10/15, TA-NY was in to pick up the PD samples
- 10/17, Four Seasons Roofing was at OU4 to repair the roof and clean the gutters.
- 10/21, AFEC Alarms was at OU4 to go over alarm system
- 10/22, Mets emptied the dumpster
- 10/27, Payson Long, NYSDEC, was in for the fire inspection, (both facilities)
- 10/27 Roy Plume, NYS OFP&C, was in for the annual fire inspection, (both facilities)
- 10/29, AFEC Alarms and Able Lifts were at OU4 to go over the options for reaching the inaccessible smoke elements

2.3 Deliveries

- 10/6, Amazon delivered the truck window
- 10/27, UPS delivered the MMC order

3 HEALTH AND SAFETY

Work at the Claremont GWTS OU5 was conducted in accordance with the approved Site Safety and Health Plan (SSHP). Safety related activities during this period included:

- Daily site safety inspections were completed as part of the routine O&M activities.
- NYSDEC and NYS OFP&C were onsite at OU4 and OU5 to perform site inspections and to review past NOVs
- The working and common surfaces around the plant are frequently cleaned with 20% bleach solution.
- The plant operator completed First Aid/CPR-AED certification training
- A damaged and hanging tree continues to partially block the path to the MW-6 well cluster

During this Covid-19 period of concern, access to the plant has been controlled and restricted.

4 PLANNED ACTIVITIES AND SCHEDULES

The evaluation of the plant operating system and equipment is ongoing by HDR. A list in the

form of corrective actions or maintenance tasks has been generated as is a monthly system status report. These reports are updated as needed and reviewed at least monthly. Both are electronically filed. The corrective action list is included at the end of the text of this report as **Table 6** – Claremont Corrective Action Summary.

Upcoming tasks include:

- The November process water samples are scheduled for a 11/19 pick up
- The backflow preventer device on the 6" water line into OU4 failed its inspection. The repair is scheduled for 11/11
- The repairs to the OU5 fire alarm open loop are scheduled for 11/11

5 MONITORING WELL WATER ELEVATIONS

The monitoring well system's groundwater elevation data table was updated after September's quarterly GW elevation reading task. This data table is available for review. The next synoptic water level round will be scheduled for December 2020, after which the table will be updated.

6 TREATMENT SYSTEM FLOWS

During October, the plant continued to operate in the auto mode. The volume of treated water discharged by the treatment system to the selected recharge basin was calculated from the plant effluent flow meter readings. These readings are taken at the HMI and recorded in the daily database. The treatment system experienced 52 minutes of downtime due to process control failures.

The total volume of treated water discharged from ~0830 hours on October 1, to ~0830 hours on November 1, was approximately 29,839,539 gallons. The plant discharge is now directed to Recharge Basin No. 1. The data in **Table 1** shows selected monthly flows discharged from the plant.

A graphic representation of the system's daily plant discharge output is provided in **Figure 1** and the daily plant totalizer readings for October are provided in **Table 4**, both following the text of this report.

Table 1 – Flow Average and Volume Discharged

Period	Average Flow (gpm)	Average Daily volume (gal)	Total Period Flow (gal)	Min off	Min on
Q4 2016	517	745,000	68,540,000	7,309	125171
Q1 2017	520	748,244	67,342,000	655	128945
Q2 2017	576	829,130	76,280,000	6,165	126315
Q3 2017	634	913,576	84,049,000	1,110	131370
Q4 2017	256	368,762	33,926,110	69,165	63315

Period	Average Flow (gpm)	Average Daily volume (gal)	Total Period Flow (gal)	Min off	Min on
Q1 2018	53	75,989	6,839,000	118,180	11420
Q2 2018	179	258,284	23,762,103	102,929	29551
Q3 2018	504	725,280	66,725,717	57,416	75064
Q4 2018	726	1,045,065	96,145,984	23,734	108746
Q1 2019	527	758,467	68,262,000	735	128865
Q2 2019	662	953,877	87,756,724	405	132075
Q3 2019	685	985,802	90,693,740	108	132372
Q4 2019	655	943,871	82,116,780	5039	129326
Q1 2020	480	682,527	62,110,000	1824	129,326
Q2 2020	698	996,998	88,732,846	3838	127,185
July 2020	676	970,124	30,073,829	170	44,495
August 2020	668	953,707	29,564,906	396	44,242
September 2020	663	943,553	28,306,598	533	42,664
October 2020	668	962,566	29,839,539	52	44,648

Under current conditions, the Programmable Logic Controller (PLC) and the control system are stable and fully functional. Flows from the individual recovery wells are remotely read, transmitted, and totalized.

During the October reporting period, the treated water discharged was redirected from Basin-33 to Basin 1 on the landfill property.

The flow summary for the individual components of the system can be found in **Table 5** at the end of this report.

7 CHEMICAL CONSUMPTION

The hydrochloric acid feed system is currently off line and the system is empty of acid. There are four drums of virgin acid on site. No acid was consumed in October.

The sodium hydroxide (caustic) storage system is currently not in use and the system is empty of caustic. There is no bulk sodium hydroxide on site and no caustic was consumed in October.

The sodium hypochlorite (bleach) storage system is currently not in use and the system is empty of bleach. No bulk sodium hypochlorite is stored on site. No sodium hypochlorite was consumed in October.

8 WASTE DISPOSAL

The routine collection of waste materials continued. The accumulated scrap metal was disposed of at Two Brothers Scrap in Melville.

9 MONTHLY DISCHARGE MONITORING REPORT

The GWTS is operated under an equivalency permit from the NYSDEC. The analytical results for the October plant discharge samples indicate that all analyzed parameters were compliant with permit limits. These results can be seen in **Table 7** following the text of this report.

The plant's water discharge permit is in the process of being renewed by the NYSDEC.

10 PENDING ISSUES AND CONSIDERATIONS

One of the damaged trees adjacent to the path to the MW-6 well cluster could not be completely removed safely. The situation could pose a threat and will continue to be monitored

The motor starter overload relay for RW-4 occasionally trips. The overload elements were replaced. Testing indicates that the relay is good.

The pressure switch for RW-5 has been tripping with greater frequency. The pressure switches may be needed due to features in the discharge manifold. The unit assemblies should be re-configured

Pump 1 of the Plant Discharge system is failing and was taken out of service. An evaluation needs to be made if pump repair is required.

The control system for the fire sprinkler system, fire alarm, and central monitoring systems at OU4 are to be replaced. HDR is awaiting the submission of proposals for the work.

The plant lights are kept on overnight because the plant lighting and emergency lighting are wired to the same circuit breaker (sole switch). These should be rewired.

The OU4 plant is offline and its disposition including that of the injection well system, and vapor carbon beds is pending.

The OU5 plant exhaust system is controlled by the methane monitoring system and needs to be separated.

The status of key aspects of OU4 are as follows:

- The plant heat is currently off
- The fire alarm panels are off-line
- The facility is secure and physical monitoring continues
- The facility and grounds are not maintained

11 PLANT DOCUMENTS

Procedures and standard forms are written, reviewed, and revised as needed. As-built drawings are generated and updated as necessary. This activity in October included:

- Form-36, Fire Safety checklist was generated
- Drawings-18, -19, and -20 Mezzanine layers were updated
- The 2020 revision to the Site Management Plant (HDR format) was started

12 MONITORING RESULTS

The Claremont Polychemical GWTS is monitored through the analysis of off-site laboratory analytical data and on-site field data.

12.1 Off-site Analytical Data Results

Monthly PD samples are taken for organic analysis in compliance with the NYSDEC discharge permit. Quarterly groundwater (GW) samples are taken for organic analysis, and quarterly process water (PW) samples are taken for organic, inorganic, and generic analysis. The October sampling activities included:

- The RI/FS data for wells was processed and submitted
- The September PD data was processed and submitted
- The October PD samples were collected and processed 10/14, and shipped 10/15
- The PW sample bottles were inventoried and staged and the sampling schedule set
- PDBs were pulled from 11 wells in order to accommodate the TOB sampling event
- The October PD data was processed and submitted.

12.2 Field Data

Plant Discharge pH and Temperature

The treatment plant effluent is monitored for pH and temperature on a weekly basis in order to obtain a monthly average in compliance with the NYSDEC discharge permit requirements. These readings are taken from the plant effluent at a controlled point with a calibrated portable meter. The plant discharge readings for October can be found below in **Table 2**.

Table 2 – Effluent pH and Temperature Readings

Date	pH (su)	Temp °F
10/5	6.9	60
10/12	7.3	59
10/19	6.7	59

Date	pH (su)	Temp °F
10/26	6.9	59
October Average	**6.95 su**	**59°F**

The NYSDEC discharge permit requires the plant discharge to have an average monthly pH between 6.5 and 8.5 standard units (su). The results for this month meet this requirement. Data showing the plant discharge's monthly average pH trend over several months is provided in **Table 8** following the text of this report.

AS Tower Air Monitoring

Using a calibrated PID meter, weekly air monitoring readings are taken from the effluent air stream of the AS Tower through Port B when the treatment system is online. The October readings from the AS tower are provided in **Table 3**. Readings are provided in parts per million as calibrated to isobutylene gas.

Table 3 – AS Tower Air Monitoring Readings

Date	Port B
10/8	0
10/13	0
10/21	0
10/28	0

There were no emissions from the Air Stripping System observed this month. No emissions have been detected since HDR began operation of the plant in October of 2016.

Other routine data collected in October included:

- The electric and water meter readings were recorded weekly.
- The plant sound levels were recorded bi-weekly.
- The electric and gas meter readings for OU4 were recorded monthly.
- The water levels in Sumps 3 and 4 were monitored.
- The recharge basins were inspected and the water levels noted.
- The differential pressure readings across the AS Tower were recorded bi-weekly.

13 PROCESS ANALYSIS and SYSTEM STATUS

The treatment system is currently operated 24/7 in the automatic mode.

13.1 Extraction (RW) Processes

- The pump at RW-4 occasionally tripped requiring the overload relay on the motor starter to be reset. The electrical power readings were normal.
- The pressure switch at RW-5 required resetting. This may need another load

adjustment.

- The motor controls and systems were inspected.
- The recovery well pump system is remotely controlled and monitored, it operates in the Auto mode. All the pumps are fully functional with pumps RW-3, RW-4, and RW-5 on line.
- Pump flow readouts are transmitted to the plant and the totalizers for 3, 4, and 5 are fully functional.
- The A/V valve at station 16+57 remains isolated from the transmission line.
- The A/V valve at station 17+10 remains isolated from the transmission line.
- RW-1 and RW-2 are off line and periodically run for PM purposes. Their flow meters are not transmitting.
- The vault heaters are currently off, panel heaters are active.

13.2 Air Stripping (AS) Process

- The three pumps are fully functional. The pumps are operated in the auto mode off the wet well level switches. One of the float switches got hung up causing the control system to shut down. This was fixed.
- Motors and seals were lubricated.
- The AS tower main drain valve's manual actuator is not functional (fail open).
- The tower media appears clean as the pressure differential between the top and bottom ports remains relatively constant. The lower section of media has been visually inspected. Analysis of the sampling data indicates that iron is being removed from the system.
- The discharge valve for ASF P1 appears to be frozen in the open position.

13.3 Plant Discharge (PD) Process

- Pump 1 has been taken out of service due to excessive noise and vibration. A full evaluation is required.
- The motors and seals were lubricated.
- The plant discharge is currently directed to Recharge Basin No.1.
- The discharge valve for PFF P2 appears to be failing in the open position. The valve for Pump 3 has failed open.

13.4 Other

- The plant's first light bank is wired to the e-light recharging system, therefore the circuit must be kept on.
- There are leaks in the water supply line running through the plant. A temporary patch was installed on one leak. The water service was restored at a lower pressure. The shut off valve may be defective.
- The fire alarm's plant loop has an open sensor and is awaiting repairs.

14 GROUNDS

14.1 Plant Perimeter

- General outdoor clean-up and landscaping tasks are on-going.
- The outdoor light timer is not operating. These conditions should not impact safety or security. Its replacement is scheduled for next month.
- The Town of Oyster Bay (TOB) continues to maintain the grounds along the plant perimeter.

14.2 Well Field

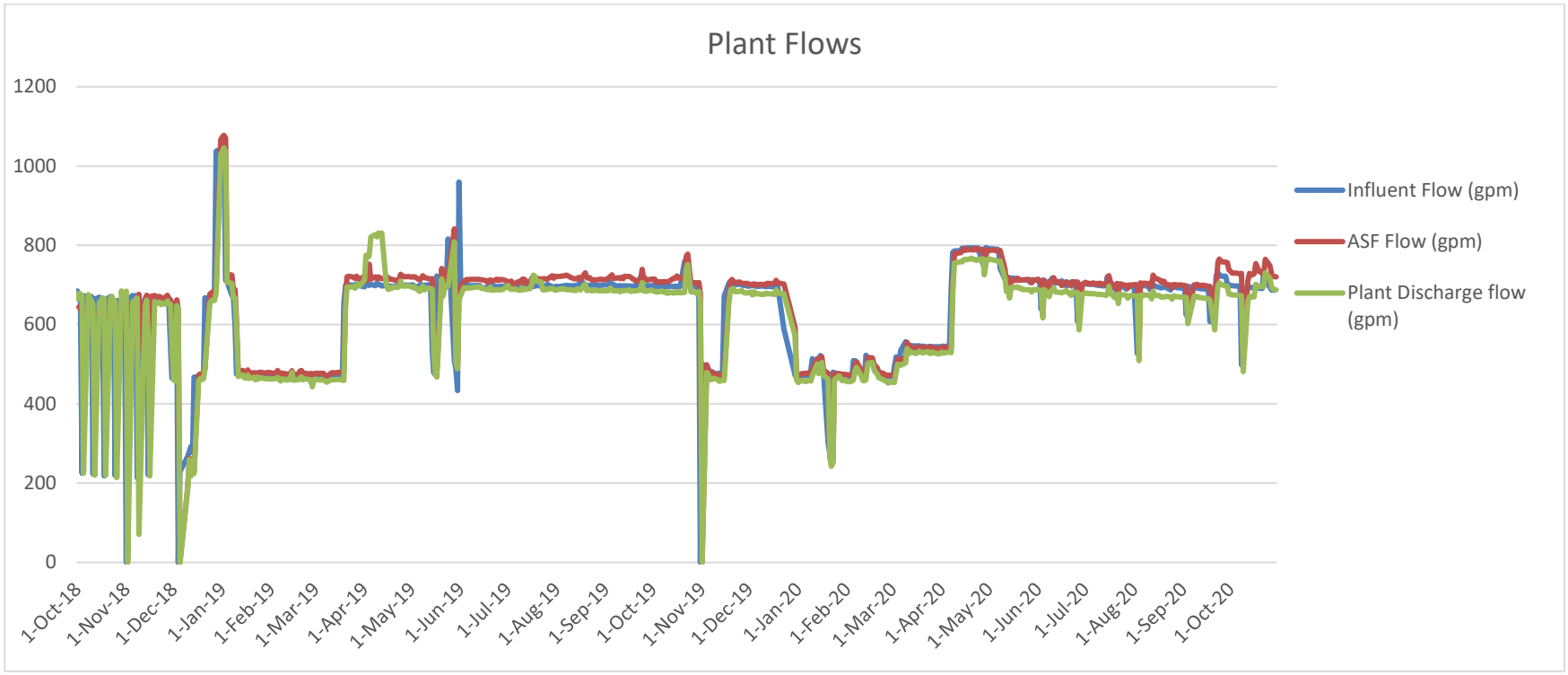
- The cleanup of vegetative growth around the monitoring wells continues. More downed trees were removed.
- The well locks at the MW-6, -8, and -10 well clusters were replaced.
- Well, well field, and basin inspections continue.
- The well access paths are now relatively clear, the downed trees and overgrowth were removed as much as possible after the last wind storm.

14.3 Other

- The grounds continue to be inspected but not maintained at OU4. The floor sump was pumped out.
- The OU4 utility meters were cleared of growth and an egress path cut around the building.
- The Claremont site is secure. There is currently no tenant on the property.

FIGURES

Figure 1 – Plant Discharge Daily Flow



TABLES

Table 4 – Plant Daily Totalizer Readings

October 2020 Flows				
	Plant Influent		Plant Discharge	
Date	Volume (gallons)	Avg. Flow (gpm)	Volume (gallons)	Avg. Flow (gpm)
1-Oct-20	1029000	715	993705	690
2-Oct-20	3010000	2090	2906757	2019
5-Oct-20	1014000	704	979220	680
6-Oct-20	1050000	729	1013985	704
7-Oct-20	953000	662	920312	639
8-Oct-20	991000	688	957009	665
9-Oct-20	2166000	1504	2091706	1453
12-Oct-20	984000	683	950249	660
13-Oct-20	988000	686	954112	663
14-Oct-20	1016000	706	981151	681
15-Oct-20	986000	685	952180	661
16-Oct-20	991000	688	957009	665
17-Oct-20	2007000	1394	2034000	1413
19-Oct-20	993000	690	997000	692
20-Oct-20	1006000	699	1014000	704
21-Oct-20	977000	678	984000	683
22-Oct-20	1014000	704	1020000	708
23-Oct-20	3093000	2148	3102000	2154
26-Oct-20	1029000	715	1035000	719
27-Oct-20	1012000	703	1011000	702
28-Oct-20	987000	685	991000	688
29-Oct-20	994000	690	995000	691
30-Oct-20	1996237	1386	1999144	1388
October Total Plant **Influent** (Gal)				30,286,237
October Total Plant **Effluent** (Gal)				29,839,539

Readings from HMI digital outputs.

Table 5 – Pump System Flow Readings

September	On-Time Minutes (actual)	Avg. Flow (gpm)	Avg. Flow (gpd) (over 30 days)	Total Flow (gal)
RW-1	9	219	-	1971
RW-2	25	244	-	6100
RW-3	44648	237	341,395	10,583,250
RW-4	40442	274	357,385	11,078,925
RW-5	44648	210	302,705	9,383,865
Plant Influent	44648	678	976,975	30,286,237
Plant Effluent	44648	668	962,566	29,839,539

The treatment process was online 31 days in October, there was 52 minutes of downtime. Flows are taken from the HMI meter readings.

Table 6 – Claremont Corrective Actions Summary

Conditions of note and corrective actions planned 10/30/2020

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
Plant heaters UH-1 and UH-2 are not working	UH-2 - needs a timer relay and wiring repairs at the unit. UH-1 – needs a transformer. It should be noted that the heating system AH-2 is adequate to heat the process area. ***No further action is planned at this time***	Electrical and/ or plant personnel	Not needed at this time. Repairs can be made with treatment system on line.	Task may require working off ladders or elevated surface.
The RW Discharge Manifold integrity is suspect	The condition of the various devices in the RW manifold vaults are suspect. The Air Vent valve in the vault on the N-side of the 6th fairway is leaking from the influent nipple. **The shut-off valve was closed and the device isolated** The air-vent valve in the vault to the east of the 6th green is leaking. **The shut-off valve was closed and the device isolated.** ***A full inspection of the manifold piping and devices should be made.***	Plant staff and outside contractors	Possible shutdown	May require a CSE
NaOH Vault sump pump not actuating	System needs to be inspected A portable submersible well pump was set up in the vault sump for manual operation ***No further action is planned at this time***	Plant staff Electrical support	None at this time	Oversight needed

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
AS Tower main drain valve does not close	Tests on the valve indicate that it does not close. This is not a problem until the tower media needs to be acid washed ***This valve should be replaced*.**	operator	Plant will need to be shut down to change out the valve	None at this time
The piping configuration for the RW pump pressure switches, pressure gages and sample ports are corroding and unwieldy and subject to catastrophic failure	The systems at RW-5 and RW-3 have failed. While piping components have been replaced, the design has not been changed. The top-heavy configuration needs a re-design and re-build or eliminated. ***The 'As-built' drawings indicate valves throughout the discharge manifold. Each pump has an isolation valve on the discharge side. If any of these valves were to be left closed, then the PS would be a good safety device. The PS assembly should be changed.***	Plant operator and spotter	Each well system will be shut down during the upgrade	Confined space entries will be required. These will generally not be permit required.
RW-2 flow sensor output is no longer displaying The RW-1 flow sensor does not function.	The flow element mechanical output is spinning and therefore is functional. The HS sending unit needs to be checked as well as the 12 volt power supply and wiring. ***This work should be scheduled as needed.***	Electrical techs	None anticipated. The system is isolated and off line	Confined space entries may be necessary

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
Lack of central monitoring of the OU4 fire sprinkler system	The Nassau County Fire Code indicates that the system have a central monitoring and flow monitoring system installed. The fire alarm panels are non-functional and are off line. **AFEC Alarm Systems in to look at system and propose options.** ***The fire alarm system is to be replaced.*** ***A central station monitoring system is to be installed.***	Plant operator, EE and outside vender	None at this time	None at this time
The pump isolation valve at RW-5 does not fully function	The valve does not fully close and it should be removed and cleaned or replaced. ***No further action is planned at this time*.**	Plant operator and spotter	Replacement of valve will require shutting down the manifold	Confined space work
Fire safety Code violations at OU5	The inspection revealed several items that needed to be resolved. ***A defective smoke detector is to be replaced and the existing system tested. It needs to be determined if central monitoring is required. All the other violations have been addressed*.**	Plant operator, TOB personnel	Disposition of TOB materials	Moving materials from mezzanine level
The power to the plant lights and the emergency light charging system are on the same electrical switch	If the plant lights are shut off at night, it inadvertently activates the emergency light system by shutting off power to the lights. This continued action may have damaged the charging system, requiring the replacement of the emergency lights. ***The plant lights are left on overnight. No further action is planned at this time.***	Plant operator. EE, outside contactors	In code violation	Possible emergency evacuation impact

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
The activation of the HVAC room and plant exhaust fans are connected to the methane monitoring system and not independently operated	It has not been determined how to manually start the exhaust fans without putting the facility into a methane alarm ***When available, EE will look into this.***	Plant operator, EE	None	Possible problem with excessive heat of fume conditions
A leak has developed at the Victaulic fitting on the PFF vent line	The Victaulic nipple to PVC connector is corroded and starting to leak. Flow is minimal. The replacement part has been received With the current valving configuration, the leak has stopped. ***No action is required at this time***	Plant operator	Shut down will be required	Ladder work
The loss of power 11/1/19 appears to have affected the outdoor lighting timer	Unit receives power but appears to not function. It is a 270 volt unit. **The unit is scheduled to be replaced.**	Plant operator	none	Electrical work
Several leaks were observed in the plant overhead water supply line.	Adjacent to the north door, a leak was observed. The covering and insulation were removed and a clam-shell type clamp was applied. The second leak observed above the AS Blower needs to be addressed. It is not readily accessible. In addition, there appears to be a problem with the water supply shut off valve. ***This work will require evaluation and outside resources***	Possibly outside plumbing contractor.	None at this time	Sanitary water may be shut off during repairs

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
The PFF pumps started short cycling. The control relays started chattering and the system was not properly controlling the pumping operation	The wiring of the system is connected below grade. The junction box in the wet well is thought to be filled with water creating a problem with the float switch to control relay wiring. The box cannot be opened without damage to it and the conduit. This appears to have been a longstanding problem. When switches have been replaced in the past, they were spliced outside the box. The float switches have been replaced but there remains a problem with the L2 circuit. The output from the W-2 relay was moved to the output for the W-1 relay. This has stopped the short cycling. ***The control wiring should be changed and moved above grade.***	Plant operator and HDR resources	Plant shut down is required	Confined space entry work
PFF P1 has started making a lot of noise	The pump when activated immediately makes a lot of noise, and the pump drop tube shakes. Smoke/ fumes emanated at the Motor-shaft connection. The motor appears to be good. The pump was removed from service, 2/24 ***It is recommended that the motor be disconnected, lifted, and the mechanical connection be checked.***	Outside contractors	Not at this time	To be determined
ASF P1 and PFF P3 discharge valves have failed Open	The valves are stuck in the open position. This does not affect the day to day operation but may have an impact on future PM tasks. **No further action at this time**	Plant operators	A shut down will be required to replace the valves	To be determined

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
As the ASF pumps cycle off/on, the check valves have started to slam closed. When reactivating, the starter contact closing is rather violent. Both actions have a tendency to rattle the piping and fixtures	There is no available literature regarding the check valves so the exact description of their functioning parts is to be determined. A softer start/stop control may fix this issue. I may also help the above issue. ***This will need further investigation***	Plant operator and EE support	If replacement or repairs are necessary, a plant shutdown will be required as the units can- not be isolated	To be determined
The overload for the RW-4 motor starter is frequently tripping.	The overload is easily reset at the pump. The OL elements have been replaced. The relay itself may need to be replaced. **This electrical testing is ongoing.**	Plant operator and EE support	To be determined	To be determined

Other Plant Conditions of Note (no action required at this time)

- The methane detection system is offline. **To function, it will need a technical inspection and technical maintenance**. However, methane does not currently appear to be a hazard
- Air stripper air flow meter is not functional. **Technical information is required for proper wiring and operation.**
- The RW-1 flow sensor is not functional. **The unit is not in service and no further action is planned at this time**. RW-1 is generally off line
- The cooling side of the AH-1 HVAC system is not functioning. **No further action is planned at this time.** AC is supplied with window units
- The RW-2 flow sensor is not functional. **No further action is planned at this time.** RW-2 is generally off line
- It has been determined that intrinsically safe components are no longer required in the plant

Table 7 – Recent Plant Discharge Analytical Results

The plant discharge was last sampled 10/13/20. The analytical results are for these samples are shown below.

Parameters	Discharge Limitations (SPDES)	Units	Results
pH (range)	*6.5 – 8.5*	*SU*	*6.95*
1,1,1-Trichloroethane	5	ug/l	U
1,1-Dichloroethane	5	ug/l	U
1,1-Dichloroethylene	5	ug/l	U
1,2- Dichloroethane	0.6	ug/l	U
Benzene	0.7	ug/l	U
Chlorobenzene	5	ug/l	U
Chloroform	7	ug/l	U
CIS 1,2-Dichloroethylene	5	ug/l	U
Ethylbenzene	5	ug/l	U
Methylene Chloride	5	ug/l	U
Tert-butyl alcohol (TBA)	Not indicated	ug/l	U
Tert-Butyl-Methyl ether (MTBA)	5	ug/l	U
Tetrachloroethylene(PCE)	5	ug/l	U
Toluene	5	ug/l	U
Trans 1,2-Dichloroethylene	5	ug/l	U
Trichloroethylene(TCE)	5	ug/l	U
Bis(2-ethylhexyl)phthalate	5	ug/l	U
Di-n-butyl phthalate	50	ug/l	U
Nitro Benzene	0.4	ug/l	U
Antimony, Total recoverable	3	ug/l	NM
Arsenic, Total recoverable	50	ug/l	NM
Barium, Total recoverable	2000	ug/l	NM
Chromium, Hexavalent	100	ug/l	NM
Lead, Total recoverable	50	ug/l	NM
Iron, Total recoverable	600	ug/l	NM
Manganese, Total recoverable	600	ug/l	NM
Mercury	Not indicated	ug/l	NM
Zinc	Not indicated	mg/l	NM
Nitrogen, Total (as N)	10	mg/l	NM
Selenium, Total recoverable	40	ug/l	NM
Solids, Total Dissolved	1000	mg/l	NM
Chloride Ion	NL	mg/l	NM
Cyanide	Not indicated	ug/l	NM
Fluoride Ion	NL	mg/l	NM
Sulfate Ion	NL	mg/l	NM
1, 4-Dioxane	NL	ug/l	NM
J – Estimated value **U** – Analyzed for but not detected **NL** – Monitor only **NM**– Not sampled Discharge limitations updates as per the water discharge permit.			

Table 8 – Plant Discharge Monthly Average pH

Month	pH (su)
Oct ‘18	7.2
Nov ‘18	7.3
Dec ‘18	6.82
Jan ‘19	7.1
Feb ‘19	7.05
Mar ‘19	6.68
Apr ‘19	6.54
May ‘19	6.61
Jun ‘19	6.5
Jul ‘19	6.6
Aug ‘19	6.56
Sep ‘19	7.45
Oct ‘19	6.86
Nov ‘19	6.88
Dec ‘19	6.84
Jan ‘20	6.63
Feb ‘20	6.75
Mar ’20	6.74
Apr ‘20	6.65
May ‘20	6.8
Jun ‘20	6.8
Jul ‘20	6.9
Aug ‘20	6.8
Sep ‘20	6.8
Oct ‘20	6.95