Monthly Report of the Operations & Maintenance Activities

Claremont Polychemical Operable Unit 5

Groundwater Treatment System

Old Bethpage, New York

November, 2021

NYSDEC Standby Engineering Contract
Work Assignment #D0076025-28

Prepared for
NYS Department of Environmental Conservation
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NEW YORK STATE OF OPPORTUNITY
Department of Environmental Conservation

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ACRONYMS AND ABBREVIATIONS

AS	Air Stripper
ASF	Air Stripper feed
BP	Bethpage State
BSP	Bethpage State Park (Black Golf Course)
CPC	Claremont Polychemical
CSE	Confined Space Entry
DOSR	Daily Operations Summary Report
EE	Electrical Engineer
EFF	Effluent
EON	EON Products, Inc.
GPD	Gallons Per Day
GPM	Gallons Per Minute
GW	Groundwater
GWTS	Groundwater extraction, treatment, and reinjection system
HDR	Henningson, Durham & Richardson Architecture and Engineering, P.C.
HHLA	High-High Level Alarm
HMI	Human Machine Interface
HVAC	Heating, Ventilation, and Air Conditioning
INF	Influent
LOTO	Lock-out, Tag-Out
MTBA	Tert-Butyl-Methyl ether
MW	Monitoring Well
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
PD	Plant Discharge
PID	Photoionization Detector
PET	Peter Takach
PFF	Pressure Filter Feed
PLC	Programmable Logic Controller
PM	Preventive Maintenance
PW	Process Water
RW	Recovery Well, Process Well
SOP	Standard Operating Procedure
SMP	Site Management Plan
SSHP	Site Safety and Health Plan
SU	Standard pH Units
TA	Eurofins-TestAmerica Laboratory
TBA	Tert-butyl alcohol
TDS	Total Dissolved Solids
TKN	Total Kjeldahl Nitrogen
TOB	Town of Oyster Bay
TOC	Total Organic Carbon
TSS	Total Suspended Solids
VOCs	Volatile Organic Compounds

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 November 2021. This report covers the operation and maintenance activities for the system during the period defined as beginning at approximately 8:30 am, November 1, 2021 through approximately 8:30 am, December 1, 2021. 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 30 days in this reporting period during which the treatment system experienced 575 minutes of complete downtime due to a power outage. Recovery Well System #5 was shut off for 83 minutes for a piping repair.

Readings of the key plant process parameters are normally recorded each workday. 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. If the plant is not occupied, the system is monitored remotely.

The treatment process control and alarm systems are functional. The recovery well pumps, the process pumps, and the air stripper blower 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 Site and Safety 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)
- Daily Process Data Sheet – point process readings (Form-30)
- Logbook CPC 5-8 – plant operator's daily logbook
- Daily Database – daily process readings (11 November 21 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 November 2021 activities is further provided in the plant operator's daily logbook.

Maintenance and project activities undertaken during the November 2021 period included:

- Routine and general maintenance tasks were conducted at the plant, on the grounds, and in the well fields.
- The fire alarm system was inspected.
- The open louver vent (methane exhaust system) was manually closed.
- After the power failure, the power to certain components in the process control system (including the uninterruptable power supply and the components plugged into it) were rerouted and the plant was restarted.
- The monthly truck inspection was completed.
- The process equipment function tests were completed.
- The process equipment seals were adjusted as necessary.
- The plant inventory continued.
- The RW System inspection was completed. A leak was observed at the RW-5 pressure switch assembly.
- The OU4 site and safety inspections were completed.
- The CPC site was inspected.
- The OU4 backflow preventer vault cover and path were cleared of vegetative growth.
- At RW-1, the blank flange and coupling seal were replaced with a new flange and pipe stub. The coupling/seal was also replaced. The system was returned to service after the manifold valves were opened.
- At RW-5, the pressure switch assembly was repaired and reinstalled. The system was returned to operation.
- The OU5 comprehensive site and safety inspections were completed.
- The monthly fire alarm system inspection was completed.
- The process equipment motors and seals were lubricated.

1.3 MAINTENANCE LOGS

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

- CL-18: OU-4 Log (at OU4)
- CL-43: General Field Support Log (truck)
- CL-47: Misc. Projects Field Notebook (PET)
- CPC 5-4: Project Support Logbook (site)
- CPC 5-8: Site Supervisor’s Daily Logbook (PET)

Except for log CPC 5-7, the completed logbooks associated with the project have been scanned and are in storage at OU5 and available for review.

2 TECHNICAL SUPPORT ACTIVITIES

2.1 HDR Personnel

- HDR maintained the system throughout the period.
- Technical expertise and guidance were provided from the HDR Mahwah, Newark, and New York City offices.
- November 4, 2021: Jennifer Rhee was onsite for the NYSDEC-Ramboll meeting.
- November 22, 2021: David Avudzega was onsite to assist with the recovery well repairs.

2.2 NYSDEC Personnel, sub-contractors, and other visitors

- November 1, 2021: Joe G of Giant Mechanical was at OU4 to check the plant heating situation.
- November 4, 2021: Payson Long, NYSDEC, was onsite for the NYSDEC-Ramboll meeting.
- November 4, 2021: Mark Byrne, Steve Phelps, and Andrew Leitzinger of Ramboll was onsite for the NYSDEC-Ramboll meeting.
- November 9, 2021: Brandon Stone and Dave of All-Weather were at OU4 to look at the plant heating issues.
- November 18, 2021: Eurofins-TestAmerica was in to pick up the PW samples.
- November 22, 2021: Backflow Specialists were at OU4 to inspect the backflow preventers.

2.3 Deliveries

- November 8, 2021: Eurofins-TestAmerica delivered the sample bottle order.
- November 18, 2021: UPS delivered the EON 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.
- A confined space entry was made into the RW-1 vault to repair the discharge manifold. Non-permit conditions were reached as the power was shut off and the pump discharge valve was closed.
- A confined space entry was made into the vault at RW-5 to repair a leak in the pressure switch assembly. Non-permit conditions were reached when the power was shut off and the pump discharge valve was closed.

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 this report as Table 1 – Claremont Corrective Action Summary.

Upcoming tasks include:

- GW water elevations are to be recorded on December 2, 2021.
- GW samples are to be collected the week of December 6, 2021 and shipped to Pace Labs on December 9, 2021.
- The quarterly methane monitoring task is scheduled for December 14, 2021.
- A site visit by Ramboll engineering is scheduled for December 15, 2021.
- The December PD samples are scheduled to be shipped December 16, 2021.
- Portable fire extinguisher inspection at OU4 and OU5, scheduled for December 16, 2021.
- Electrical testing of the ASF pump motor starters will be scheduled for during the next monthly baseline testing task.

5 MONITORING WELL WATER ELEVATIONS

The monitoring well system's groundwater elevation data table was updated in September 2021 after the quarterly GW elevation recording task; this database is available for review. The next synoptic water level round will be scheduled for December 2, 2021 after which the table will be updated again.

6 TREATMENT SYSTEM FLOWS

During the November 2021 period, the plant continued to operate in the auto control mode. The volume of treated water discharged by the treatment system to the selected recharge basins was calculated from the plant influent and effluent flow meter readings. These readings are taken at the HMI and recorded in the daily database. The treatment system experienced a power outage and was offline for 575 minutes.

Currently the plant discharge is solely directed to Recharge Basin 1.

The total volume of treated water discharged from 8:30 am, November 1, 2021 to 8:30 am December 1, 2021 was approximately 30,232,000 gallons. The data in Table 2 is a summary of plant discharge flows.

A graphic representation of the system's daily plant discharge output is provided in Figure 1 and the daily plant totalizer readings for November are provided in Table 3, both following the text of this report.

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.

The flow summary for the individual components of the system can be found in Table 4 at the end of this report.

7 CHEMICAL CONSUMPTION

The hydrochloric acid feed system is currently offline and the system is empty of acid. Four drums of virgin acid on site. No acid was consumed in November 2021.

The sodium hydroxide 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 November 2021.

The sodium hypochlorite 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 November 2021.

8 WASTE DISPOSALS

The routine collection of waste materials continued. The accumulated spent batteries, lamps, toner cartridges, and empty test gas cylinders were disposed of at the TOB depot.

9 MONTHLY DISCHARGE MONITORING REPORT

The GWTS is operated under an equivalency permit from the NYSDEC. **Table 5** provides the Claremont OU5 O&M Sampling and Measurement requirements and their frequency. The analytical results for the November 2021 process water samples indicate that all analyzed parameters were compliant with permit limits (**Table 6**).

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

10 PENDING ISSUES AND CONSIDERATIONS

The leak at RW-1 was repaired and the well returned to standby status.

The CPC site has a new tenant. International Warehousing is leasing the property to park their trailers.

The incoming electric service powering the recovery well pumps has shown a tendency fluctuate. The incoming voltage will be monitored at least monthly and adjusted as necessary.

The OU4 plant HVAC system was shut down when the blower drive flywheel shaft failed. The system is currently offline and will be required when the colder weather arrives. Several HVAC contractors have been onsite to look at the project. It needs to be decided whether to drain the system in the interim.

The discrepancies/inaccuracies in the plant flow meter readings may be due to the inappropriate configuration of the local piping. Future calibration or adjustment of pulse reading may be required.

A damaged tree adjacent to the path to the MW-6 well cluster continues to obstruct the path. The situation will continue to be monitored.

The well path to the BP-3 cluster following rain events still poses issues for vehicle transport. Work and upkeep will continue as necessary along the path.

The alarm and monitoring systems for the OU4 fire sprinkler and fire safety systems are to be replaced. Contractors have been onsite to check for installation options.

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

The status of key aspects of OU4 are as follows:

- The plant heat is currently off, and the system is out of service.
- The fire alarm panels are offline.
- The fire sprinkler system is online. It is frequently checked but not centrally monitored.
- The facility is secure, and its physical monitoring continues.
- The facility and grounds are not maintained except for the facility entrance and plant egress points.
- There is a new tenant on the Claremont Polychemical site.

11 PLANT DOCUMENTS

Procedures and standard forms are written, reviewed, and revised as needed. As-built drawings are generated and updated as necessary. The November document tasks included:

- The Site Management Plan was updated and reviewed.
- The OU4/OU5 Emergency Action Plan (EAP) was updated.
- Health and Safety procedures were updated for the EAP including HS-1 thru HS-8.
- Form-06 (Incident Report) and Form-13 (Bomb Threat) were updated for the EAP.
- The SOP manual was updated to reflect the EAP updates.

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 November 2021 sampling activities included:

- The 11 PDBs were returned to their respective wells (November 2, 2021) after TOB completed its sampling.
- The October 2021 PD data was processed and submitted.
- The PW field samples were collected and processed on November 16, 2021. The RW discharge pH readings were recorded. The PW plant samples were collected and processed on November 17, 2021. The Influent and effluent pH levels were recorded. The PD hexavalent chromium samples were collected on November 18, 2021. All the PW samples were packed and shipped on November 18, 2021 to Eurofins-TestAmerica for analysis.

12.2 Field Data

Plant Discharge pH and Temperature

The treatment plant effluent is monitored for pH and temperature on a weekly basis 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 November 2021 can be found in **Table 7** following the text of this report. The November 2021 average pH reading was 7.09 standard units (su).

The NYSDEC discharge permit requires the plant discharge to have an average monthly pH between 6.5 and 8.5 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, weekly VOC air monitoring readings are measured from the effluent air stream of the AS Tower through Port B when the treatment system is online. The November 2021 readings from the AS tower are provided in **Table 9**.

There were no emissions from the Air Stripping System observed in November 2021. No emissions have been detected since HDR began operation of the plant in October 2016.

Other routine data collected in November 2021 included:

- The electric and water meter readings at OU5 were recorded weekly.
- The plant vaults and selected areas were monitored for VOCs weekly.
- The plant sound levels were recorded every two weeks.
- The electric and gas meter readings for OU4 were recorded.
- The recharge basins were inspected and the water levels were noted.
- The differential pressure readings across the AS Tower were recorded every two weeks.
- The power supply voltage to the recovery wells was recorded.

13 PROCESS ANALYSIS and SYSTEM STATUS

The treatment system is currently operated 24/7 in the automatic mode and is remotely monitored as necessary.

13.1 Extraction (RW) Processes

- The pipe repair at RW-1 was completed. The two isolation valves in the discharge manifold were opened and the pumps at RW-1 and RW-2 were returned to standby status.
- The leak at the RW-5 pressure switch assembly was repaired.
- The monthly system inspection was completed.
- The incoming voltage was measured.
- The vault space heating units were activated
- The recovery well pump system is remotely controlled and monitored, it operates in the automatic mode. The pumps at RW-3, RW-4, and RW-5 are online and fully functional.
- Pump flow readouts are transmitted to the plant and the totalizers for the pumps at RW-3, RW-4, and RW-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 offline and periodically run for preventative measure purposes. Their flow meters are not transmitting through the PLC. When repairs were made at RW-1, stones were removed from the flow meter housing. There was a thick coating of iron salt deposits on the housing and impeller.

13.2 Air Stripping (AS) Process

- The three pumps are fully functional. The pumps are operated in the automatic mode controlled by the wet well level switches. Pump 3 continues to trip occasionally.
- Motors and seals were lubricated as necessary, and the seal drains were cleared.
- 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.
- The discharge valves for ASF P1 and P2 appear to be frozen in the open position.

13.3 Plant Discharge (PD) Process

- The plant discharge flow is currently directed to Recharge Basin 1.
- The valve influent to Recharge Basin 33 remains closed.
- Pump 1 has been taken out of service due to excessive noise and vibration and a full evaluation is required. Pumps 2 and 3 are fully functional.
- The motors and seals were lubricated as necessary.
- The discharge valve for PFF P3 has failed open.

13.4 Other

- The plant lost power for several hours in November 2021. The system was manually restarted. The UPS failed and is to be replaced.
- The plant's first bank of lights is wired to the emergency-light recharging system. The circuit is kept on 24/7. The lamps appear burnt out. The second bank of lights provides sufficient lighting for general tasks.
- The potential for leaks in the water supply line running through the plant will continue to be monitored.
- The fire alarm system is fully functional. Central monitoring is functional.
- The monthly truck inspection was completed.

14 GROUNDS

14.1 Plant Perimeter

- General outdoor clean-up tasks are on-going.
- The TOB continues to maintain the grounds along the plant perimeter including landscaping.
- The fencing is clear and secure.

14.2 Well Field

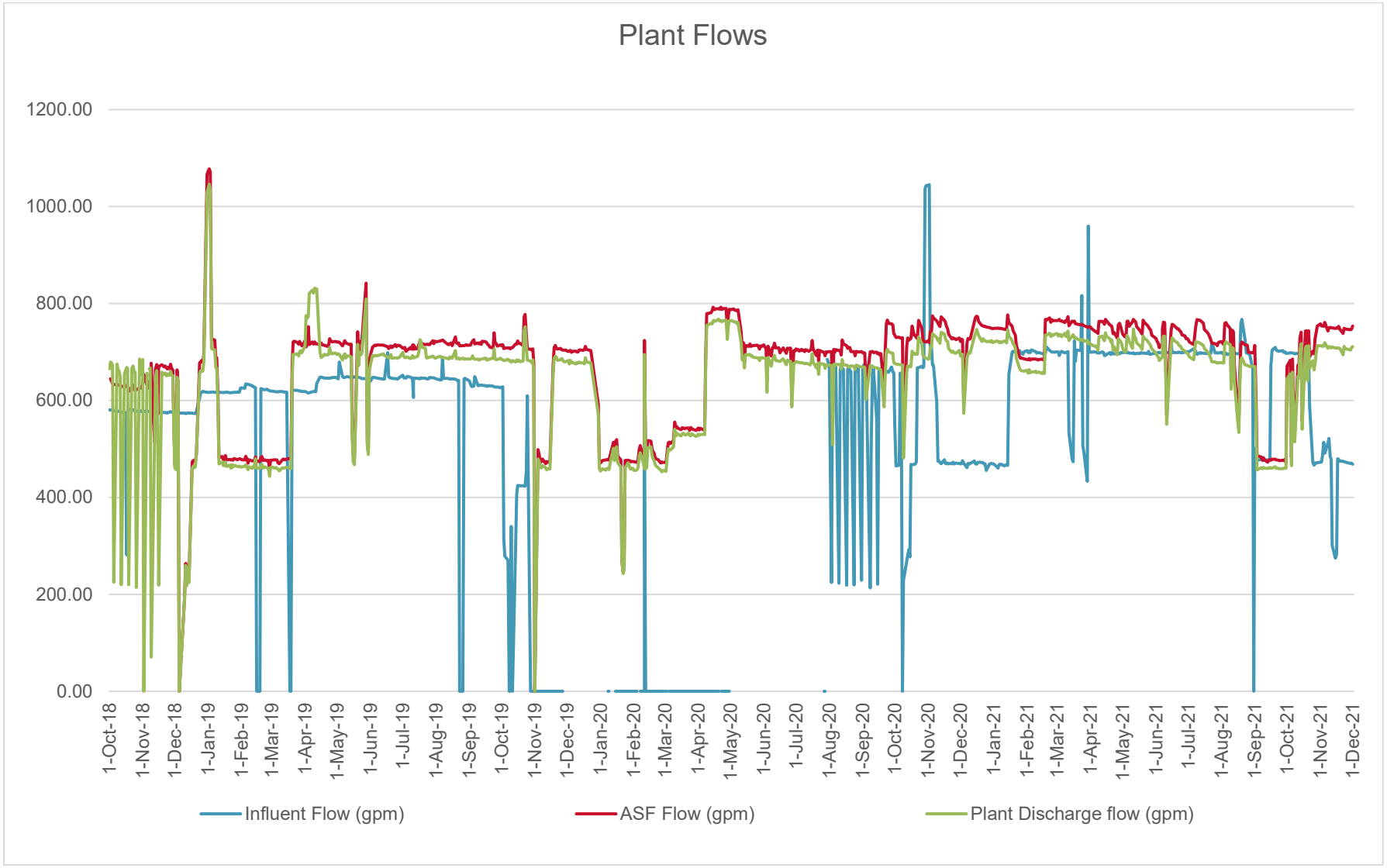
- Well, well field, and recharge basin inspections continue.
- The well access paths are maintained.

14.3 Other

- The Claremont Polychemical GWTF OU4 is secure.
- The property at and around the OU4 site continue to be inspected. While the grounds are not maintained, the treatment plant's entrance and egress points are kept clear and functional.

FIGURES

Figure 1 – Plant Discharge Daily Flow



TABLES

Table 1 - Claremont Corrective Actions Summary

Conditions of note and corrective actions planned 11/30/2021

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
The RW Discharge Manifold integrity is suspect	The condition of the various devices on the RW discharge manifold 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. The manifold employs isolation, venting, and drain valves as well as other devices. Along the path of the manifold are vaults which house some of these devices. These vaults need to be accessed, pumped out, and the devices tested. ***This month (November 2021) two isolation valves were closed between RW-1 and RW-3. These valves seemed to hold.***	Plant staff and outside contractors	Possible shutdown	May require a CSE
AS Tower main drain valve is not controlled	The valve does not respond to manipulation of its actuator ***This valve should be replaced. No further action is planned at this time***	Operator	System will need to be shut down to change out the valve	None
OU4 fire alarm system is not functioning Central monitoring of the fire alarm system or fire suppression system does not exist	The Nassau County Fire Code indicates that the sprinkler system must have central monitoring for flow and valve tampering. The fire alarm system needs to be replaced and centrally monitored. ***BK Fire was in to propose an alarm and central monitoring system for the Fire sprinkler system- awaiting scheduling.***	Plant operator, EE and outside vender	None at this time	Fire code violations

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
Several leaks were observed in the plant overhead water supply line.	Adjacent to the north door a clam-shell type clamp was applied. The second leak observed above the AS Blower is not readily accessible and is not problematic ***Repair work may require evaluation and outside resources. Currently the situation is controlled.***	Outside plumbing contractor?	None	Sanitary water may be shut off during repairs
The float controls for the PFF pump system have intermittently shorted out causing the system to not properly control the pumping operation	• The wiring of the pump control 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 switches to control relay wiring. • The box cannot be opened without damage to it and the conduit. This appears to have been a longstanding problem, as when switches have been replaced in the past, they were spliced outside the box. • The float switches have been replaced and spliced above the sump 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. Currently the second splices to the floats is above ground outside the vault***	Plant operator and HDR resources	Plant shut down is required	Possible Confined Space Entry work
PFF P1 has failed	The pump when activated immediately makes a lot of noise, and the pump drop pipe shakes. Smoke/ fumes emanated at the Motor-shaft connection. The motor appears to be good. The pump was removed from service on February 24, 2020 ***It is recommended that the motor be disconnected, lifted, and the mechanical connection be checked.***	Outside contractors	None anticipated	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 motor starter contact chatters. Both actions tend 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. ***This will need further investigation. Soft-start equipment and variable frequency controls were discussed***	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 flowmeters for system flow, ASF flow and plant discharge are out of sync with the flow meters on the recovery wells.	Although the ASF flow meter is the most out of line, it is plumbed correctly. The influent system flow meter and the plant discharge flow meters are piped incorrectly. The same style of relay is used to count pulses, but the meters have not been calibrated **The system needs further investigation to determine if any changes are warranted**	Electrical engineering	To be determined	None
EF-4 does is not operatable.	Fan is controlled by mezzanine thermostat, but it does not appear to be operating. May need electrical testing. **The system was checked, it appears that the fan is not functioning. The fan should be replaced**	EE support	Only in an emergency	Only in an emergency
Wiring nests in main control console	**The wiring in the main control console needs to be cleaned up and labeled, to facilitate problem troubleshooting and process improvements**	EE support	A shut down may be necessary	Electrical work
RW discharge manifold has been restricted	A leak developed on the discharge side of the pump for RW-1. The manifold was cut and capped in the vault. Isolation valves were closed between RW-1 and RW-2 and between RW-2 and RW-3. The pumps at RW-1 and RW-2 were locked out. **The pipe was repaired November 22, 2021, the valves opened, and the pumps returned to stand-by status**	Plant operator and spotter	May require a plant shut down	Confined space entry

Condition to be Corrected	Status and Actions	Resources	Plant Ops Impact	Health & Safety Impacts
Pressure Filter Feed pump controls	With P1 out of service, the sequencing of pumps allows for the PFF vault to reach HHL conditions in certain circumstances. **Reprogram the sequencing to eliminate the position of P1**	EE support	To be determined	To be determined
HMI UPS failure	The uninterruptable power supply protecting various components in the treatment system controls has failed. The power to the effected devices has been rerouted from other sources. **The unit should be replaced and the system checked. Will evaluate December 2021.**	Plant operator	There may be a momentary shut down as components are reconnected	None anticipated

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. It has been determined that intrinsically safe components are no longer required in the plant.
- As there has been no need for acid washing the AS Tower media, the hydrochloric acid feed and storage system has not been operated. The tanks have not been filled and the tank level monitoring system has not been operated.

As previously noted, there are pieces of equipment that are out of service and require repairs. Currently there are no plans for addressing these conditions as the operation of this equipment is not necessary or needed for the operation of the treatment system.

Equipment	Fault	Status
Plant electric heater UH-1	Needs transformer.	Heater is not needed
Plant electric heater UH-2	Needs relay timer and wiring repairs.	Heater is not needed
Recovery well pump pressure switch assembly	Units are unwieldy and subject to vibration, corrosion, and leaks.	Each unit requires assessment and disposition
NaOH sump pump	Pump is not operating.	No water or chemicals stored in vault. Portable submersible pump in sump should suffice.

Plant lights are wired to the emergency light charging system	Un-segregated light cannot be shut off. Several of the lamps may have burnt out.	The bank of lights appears to have failed/burnt out. The second bank of lights are sufficient.
Plant exhaust fans are part of methane system	Fans cannot be manually operated.	Once the methane monitoring system is online, the fans can be operated.
Plant discharge drain	Leak in Victaulic fitting.	Drain line on plant discharge intermittently leaks. Parts are in-house. Not pressing
ASF pump isolation valve	Valve P1 has failed open.	Not needed at this time
PFF pump isolation valve	Valve P3 has vailed open.	Not needed at this time
RW-1 flow meter	The meter is not operating.	Pump is offline. Rocks were pulled from the housing and much iron sediment was encrusting the impeller and housing
RW-2 flow meter	The meter is not transmitting.	Pump is offline
Air stripper flow meter	Non-functional and removed.	
AH-1 condenser	Air conditioner is non-functional.	Two window AC units in place
Plant outdoor lights	9/12 lights not functioning.	Not a security issue.

Table 2 – Plant Discharge Average Flow & Volume

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	125,171
Q1 2017	520	748,244	67,342,000	655	128,945
Q2 2017	576	829,130	76,280,000	6,165	126,315
Q3 2017	634	913,576	84,049,000	1,110	131,370
Q4 2017	256	368,762	33,926,110	69,165	63,315
Q1 2018	53	75,989	6,839,000	118,180	11,420
Q2 2018	179	258,284	23,762,103	102,929	29,551
Q3 2018	504	725,280	66,725,717	57,416	75,064
Q4 2018	726	1,045,065	96,145,984	23,734	108,746
Q1 2019	527	758,467	68,262,000	735	128,865
Q2 2019	662	953,877	87,756,724	405	132,075
Q3 2019	685	985,802	90,693,740	108	132,372
Q4 2019	655	943,871	82,116,780	5039	129,326
Q1 2020	480	682,527	62,110,000	1824	129,326
Q2 2020	698	996,998	88,732,846	3838	127,185
Q3 2020	669	955,928	87,945,333	1099	131,401
Q4 2020	695	1,001,365	92,125,539	52	132,497
Q1 2021	708	1,019,733	91,776,000	0	129,603
Q2 2021	709	1,021,317	92,939,850	0	131,040
July 2021	697	1,003,628	31,112,465	0	44,636
Aug 2021	672	967,055	29,978,703	0	44642
Sept 2021	471	677,758	20,332,729	0	43197
Oct 2021	637	888,098	27,531,047	1390	43193
Nov 2021	709	1,007,733	30,232,000	575	42628

Table 3 – Plant Daily Totalizer Readings

November 2021 flows	Plant Influent		Plant Discharge		RW Discharge	
Date	Volume	Avg. Flow	Volume	Avg. Flow	Volume	Avg. Flow
1-Nov-21	1048000	728	1039000	722	1067000	741
2-Nov-21	1031000	716	1029000	715	1055000	733
3-Nov-21	1028000	714	1023000	710	1050000	729
4-Nov-21	1030000	715	1026000	713	1053000	731
5-Nov-21	2725000	631	2706000	626	2786000	645
8-Nov-21	997000	692	998000	693	1006000	699
9-Nov-21	1037000	720	1032000	717	1046000	726
10-Nov-21	1026000	713	1022000	710	1040000	722
11-Nov-21	1026000	713	1020000	708	1039000	722
12-Nov-21	3079000	713	3080000	713	3124000	723
15-Nov-21	1026000	713	1024000	711	1044000	725
16-Nov-21	1017000	706	1016000	706	1034000	718
17-Nov-21	1021000	709	1020000	708	1039000	722
18-Nov-21	999000	694	998000	693	1016000	706
19-Nov-21	3066000	710	3061000	709	3122000	723
22-Nov-21	1070000	743	1063000	738	1090000	757
23-Nov-21	971000	674	975000	677	989000	687
24-Nov-21	2042000	709	2038000	708	2082000	723
26-Nov-21	3041000	704	3034000	702	3102000	718
29-Nov-21	1021000	709	1016000	706	1042000	724
30-Nov-21	1010000	701	1012000	703	1031000	716
Nov. Total Plant **Influent** (Gal)				30,311,000		
Nov. Total Plant **Effluent** (Gal)				30,232,000		
Nov. Total **RW Discharge** (Gal)				30,857,000		

Table 4 – Pump System Flow Readings

September	On-Time Minutes (actual)	Avg. Flow (gpm)	Avg. Flow (gpd)	Total Flow (gal)
RW-1	0	0	0	0
RW-2	0	0	0	0
RW-3	42628	225	319,567	9,587,000
RW-4	42628	277	393,967	11,819,00
RW-5	42545	222	315,033	9,451,000
RW Totals	42628	723	1,028,567	30,857,000
Plant Influent	42628	711	1,010,367	30,311,000
Plant Effluent	42628	709	1,007,733	30,232,000

The treatment process was online 30 days in November with 575 minutes of downtime. Flows are taken from the HMI meter readings.

Table 5 – Claremont OU5 O&M Sampling/Measurement Program and Frequency

Measurement / Analyte	Sampling Location			
	System Influent	Plant Discharge	Recovery Wells	Monitoring Wells
Flow	Daily	Daily	Daily	NA
pH	Quarterly	Weekly	Quarterly	Quarterly
VOCs (+Tert-Butyl-Methyl ether (MTBA) & Tert-butyl alcohol (TBA))	Quarterly	Monthly	Quarterly	Quarterly
SVOC Base Neutral & Acid Extractables (BNA)	Quarterly	Monthly	NS	NS
Total Kjeldahl Nitrogen (TKN)	NS	Quarterly	NS	NS
Total Suspended Solids (TSS)	Quarterly	NS	Quarterly	NS
Total Organic Carbon (TOC)	Quarterly	NS	NS	NS
Total Dissolved Solids (TDS)	NS	Quarterly	NS	NS
Cyanide	NS	Quarterly	NS	NS
Hexavalent Chromium	NS	Quarterly	NS	NS
Mercury	NS	Quarterly	NS	NS
Metals (AES/MS)	Quarterly	Quarterly	Quarterly	NS
Anions	NS	Quarterly	NS	NS

Notes: NA – Not applicable; NS – Not sampled.

Table 6 – Recent Plant Discharge Analytical Results

The plant discharge was last sampled between November 20, 2021 and November 29, 2021. The results for the November samples are below:

Parameters	Discharge Limitations (SPDES)	Units	Results
pH (range)	*6.5 – 8.5*	*SU*	*6.98*
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	U
Arsenic, Total recoverable	50	ug/l	U
Barium, Total recoverable	2000	ug/l	87.8J
Chromium, Hexavalent	100	ug/l	U
Lead, Total recoverable	50	ug/l	U
Iron, Total recoverable	600	ug/l	U
Manganese, Total recoverable	600	ug/l	145
Mercury	Not indicated	ug/l	U
Zinc	Not indicated	mg/l	NM
Nitrogen, Total (as N)	10	mg/l	6.5
Selenium, Total recoverable	40	ug/l	U
Solids, Total Dissolved	1000	mg/l	259
Chloride Ion	NL	mg/l	115
Cyanide	Not indicated	ug/l	U
Fluoride Ion	NL	mg/l	0.038J
Sulfate Ion	NL	mg/l	17.7
1, 4-Dioxane	NL	ug/l	U

J – Estimated value **U** – Analyzed but not detected NL – Monitor only **NM**– Not sampled
Discharge limitations updates as per the water discharge permit.
Note: Parameters shaded in gray are sampled quarterly with results being provided March, June, October, and December

Table 7 – Effluent pH and Temperature Readings

Date	pH (su)	Temp ˚F
11/2/2021	7.26	57
11/9/2021	6.86	57
11/15/2021	7.35	56
11/23/2021	6.96	55
11/29/2021	7.01	56
November Average	**7.09 su**	**56^{O}F**

Table 8 – Plant Discharge Monthly Average pH

Month	pH(su)
June ‘19	6.5
July ‘19	6.6
Aug ‘19	6.56
Sept ‘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
June ‘20	6.8
July ‘20	6.9
Aug ‘20	6.8
Sept. ‘20	6.8
Oct. ‘20	6.95
Nov. ‘20	6.8
Dec ‘20	6.64
Jan ‘21	6.8
Feb ‘21	6.75
Mar ‘21	6.76

Apr ‘21	7.28
May ‘21	7.53
June ‘21	7.44
July ‘21	7.41
Aug ‘21	7.42
Sept ‘21	7.13
Oct ‘21	7.10
Nov ‘21	7.09

Plant discharge monthly average pH readings

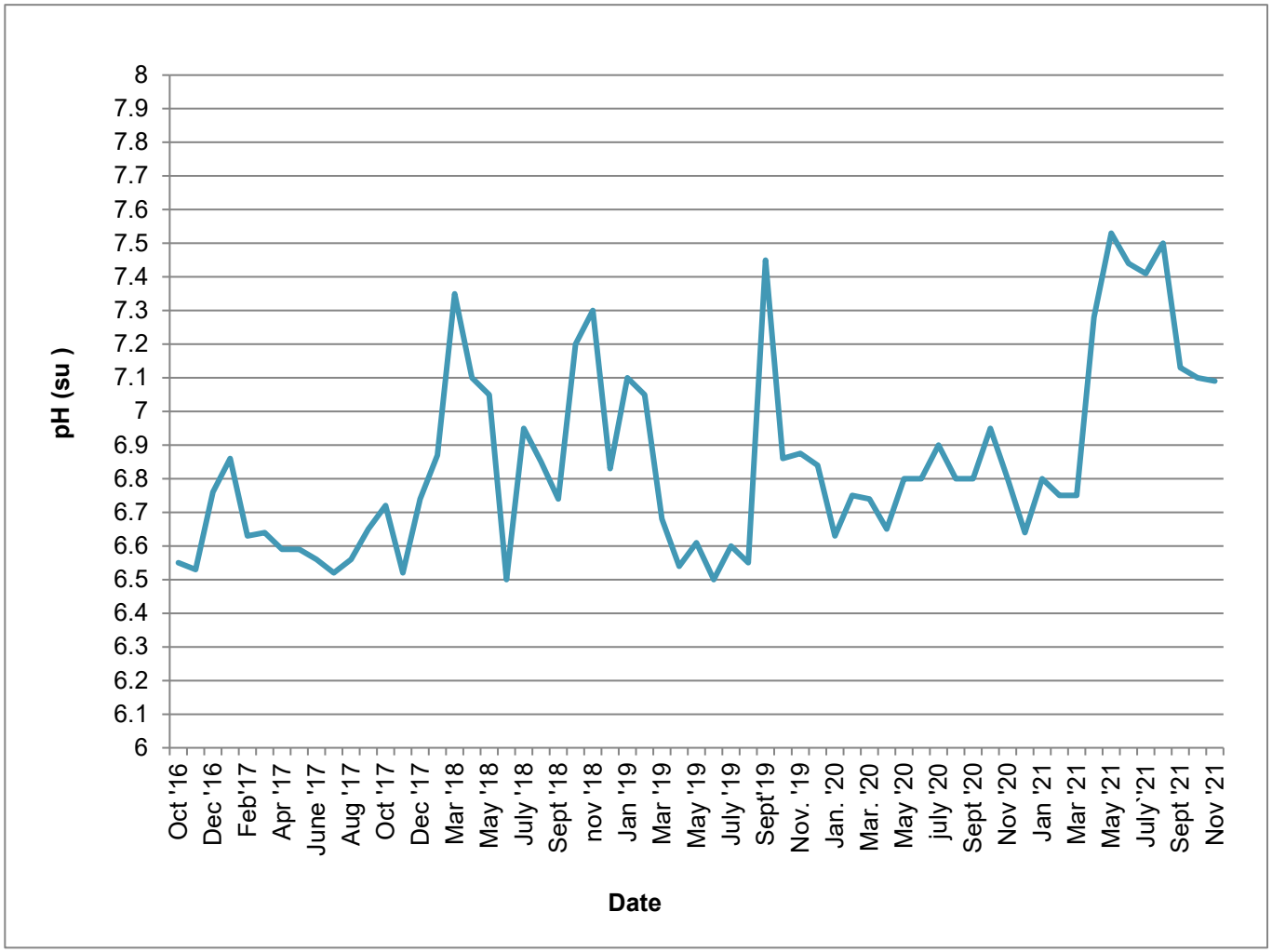


Table 9 – AS Tower Air Monitoring Readings

Recorded Date	Port B
11/2/2021	0
11/9/2021	0
11/15/2021	0
11/23/2021	0
11/29/2021	0