HRSD SWIFT Research Center (SRC) Quarterly Report on SWIFT Water Quality Targets

This report documents SWIFT Water Quality results for recharge operations from July 1 – September 30, 2022. The compliance requirements are documented in HRSD's SWIFT Underground Injection Control Inventory Information Package (UIC-IIP) submitted to EPA Region III in January 2018. These requirements are noted in Tables 1-4 and reflect an update to the monitoring and compliance evaluation for Total coliform.

Figures 1 and 2 and Table 6 provide a summary of the data from the referenced quarter of operations relative to the SWIFT Water Quality Targets. Table 6 represents a summary of all analytes that were present above the laboratory reporting limit. A detailed table identifying the parameters monitored for the purpose of evaluating compliance with the SWIFT Water Quality Targets can be found as an Appendix to this report.

Parameter	Proposed Regulatory Limit	Non-Regulatory Action/Goal
EPA Drinking Water Primary Maximum Contaminant Levels (MCLs)	Meet all primary MCLs	N/A
Total Nitrogen	5 mg/L Monthly Average; 8 mg/L Max Daily	Secondary Effluent Critical Control Point (CCP) Action Limit for Total Inorganic Nitrogen (TIN) = 5 mg/L-N; CCP Action Limit for SWIFT Water Total Nitrogen (TN) = 5 mg/L-N
Turbidity	Individual Filter Effluent (IFE) < 0.15 NTU 95% of time and never >0.3 NTU in two consecutive 15 min measurements	CCP Action Limit IFE of 0.15 NTU to initiate backwash or place a filter in standby
Total Organic Carbon (TOC) ¹	4 mg/L Monthly Average; 6 mg/L Maximum Daily	Critical Operating Point (COP) Action Limit to Initiate GAC Regeneration
Total Coliform ²	<2 CFU/100 mL for 95% of calendar month observations, applied as the 95 th percentile	N/A
E.coli	Non-detect	N/A
TDS ³	N/A	Monitor PAS Compatibility

Table 1: SRC Regulatory and Monitoring Limits for SWIFT Water

¹ Regulatory limit applies to the TOC laboratory analysis which is collected at a minimum frequency of 3 times per week.

² The Total Coliform (TC) monitoring and compliance evaluation reflects an update effective in January 2020 following consultation with the Virginia Department of Health and EPA Region III UIC staff.

³ No limit for Total Dissolved Solids (TDS) proposed as the primary driver is aquifer compatibility. The concentration of TDS in SWIFT Water at the SRC generally ranges from 500-850 mg/L.

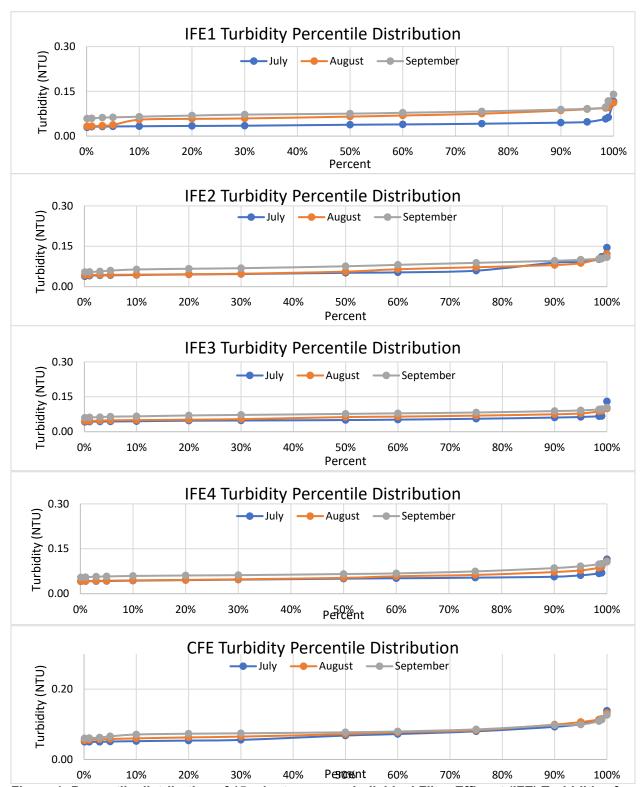


Figure 1: Percentile distribution of 15-minute average Individual Filter Effluent (IFE) Turbidities for Biofilters 1-4 (IFE1-4) and Biofilter Combined Filter Effluent (CFE). There were no 15-minute periods in this quarter with biofilter effluent turbidity values greater than 0.3 NTU. The 95% measured value for each biofilter IFE and the CFE was less than 0.15 NTU for each month in this quarter.

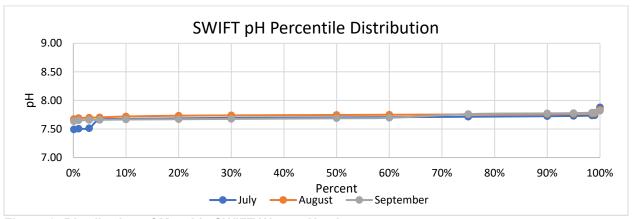


Figure 2: Distribution of Monthly SWIFT Water pH values.

Monitoring at the SRC also includes monitoring for performance indicators as documented in Table 2.

Constituent	Category	Trigger Value	Unit	Notes
1,4-Dioxane	Public Health	1	μg/L	CCL4; CA Notification Limit
17-β-Estradiol	Public Health	0.91	ng/L	CCL4
DEET	Public Health	200	μg/L	MN Health Guidance Value
Ethinyl Estradiol	Public Health	280¹	ng/L	CCL4
NDMA	Public Health	10	ng/L	CCL4; CA Notification Limit
Perchlorate	Public Health	6	μg/L	CA Notification Limit
PFOA+PFOS	Public Health	70	ng/L	CCL4; EPA Health Advisory
TCEP	Public Health	5	μg/L	MN Health Guidance Value
Cotinine	Treatment Effectiveness	1	μg/L	
Primidone	Treatment Effectiveness	10	μg/L	Surrogate for low molecular weight, partially charged cyclics
Phenytoin	Treatment Effectiveness	2	μg/L	paraman, anangan ayana
Meprobamate	Treatment Effectiveness	200	μg/L	High occurrence in wastewater
Atenolol	Treatment Effectiveness	4	μg/L	treatment plant effluent
Carbamazepine	Treatment Effectiveness	10	μg/L	Unique structure
Estrone	Treatment Effectiveness	320	ng/L	Surrogate for steroids
Sucralose	Treatment Effectiveness	150	mg/L	Surrogate for water soluble, uncharged chemicals with moderate molecular weight
Triclosan	Treatment Effectiveness	2,100	μg/L	Chemical of interest

¹ Identified as "To Be Determined" in the UIC-IIP. Since that time, threshold values were identified in *Monitoring Strategies for Constituents of Emerging Concern (CECs) in Recycled Water, Recommendations of a Science Advisory Panel, 2018; SCCWRP Technical Report 1032.*

Table 2: SRC Non-Regulatory Performance Indicators

Pathogen Log Removal Value (LRV) is not strictly regulated but the SRC has been

designed and is operated to achieve at least 12 LRV for viruses and 10 LRV for *Cryptosporidium* and *Giardia* through a combination of advanced treatment processes and soil aquifer treatment. Table 3 provides a treatment process pathogen LRV summary for recharge conditions. Table 4 provides additional monitoring that is being completed to document compliance with the LRVs for ozone and UV.

Parameter	Floc/Sed (+BAC)	Ozone	BAC+GAC	UV	CI2	SAT	Total
Enteric Viruses	2	0-3 (TBD)	0	4	0-4	6	12-19
Cryptosporidium	4	0	0	6	0	6	16
Giardia	2.5	0-1.5 (TBD)	0	6	0	6	14.5-16

Table 3: SRC Pathogen LRV for Potomac Aquifer System (PAS) Recharge.

Ozone LRV
Ozone Influent Temperature
Ozone Influent Flow
Liquid Phase Ozone Concentration ¹
Contact Time
СТ
UV LRV
UV Intensity, each reactor
UVT, GAC Combined Effluent
Reactor Flow, each
Calculated Dose, each Lamp
Status, each

¹ The ozone liquid phase probe is verified with lab grab samples performed at least once per week.

Table 4: Additional Monitoring to Support Ozone and UV LRV. All data are collected as continuous measurements. The 15-minute LRV data is submitted in Table 6.

Critical Control Points

The SRC incorporates Critical Control Points (CCP) throughout the treatment process, per Attachment G of UIC-IIP, to verify that treatment goals are being met at each of the individual processes. A violation of any CCP means that the SRC may not be producing water that meets the treatment goals and will trigger a diversion of the SWIFT Water so that it is not directed to the recharge well. In most instances, the SRC will continue to operate through the CCP violation, but the SWIFT Water will be diverted back to the Nansemond Plant chlorine contact tanks (CCT).

CCPs have alert values at which point the operator is expected to take action to correct the performance as well as the alarm values at which point an automated response will trigger action and prevent flow from going to the recharge well. Both the alert and alarm values will be measured consistently for a specified duration

before action is taken so that blips in online analyzers do not trigger action. The specific values for the alert and alarm levels will be configured as adjustable set points in the Distributed Control System (DCS) and optimized as needed to meet the water quality requirements.

Table 5 shows the current CCPs in effect at the SRC. Modifications have been made to the CCPs since startup as compared to the original design documents in order to optimize their performance. No modifications to the CCPs were made this quarter. Each of the modifications from previous quarters was discussed in the relevant quarterly report for the period.

Parameter	Alert Value	Alarm Value	Unit	Action
Critical Control Points (CCPs)				
Influent Pump Station Conductivity	1,400	1,600	microSiem ens per centimeter	Place Biofilters in Filter To Waste
Influent Pump Station Total Inorganic Nitrogen	4.0	5.0	mg/L-N	Place Biofilters in Filter To Waste
Influent Pump Station Turbidity	3.5	5.0	NTU	Place Biofilters in Filter To Waste
Preformed Chloramine Failure on Injection	N/A	Failure	mg/L	Divert SWIFT Water
Total Chlorine Post Injection upstream of ozone	2.0	1.0	mg/L	Divert SWIFT Water
Chloramine injection upstream of ozone	2.0	1.0	mg/L	Divert SWIFT Water
Ozone Feed	N/A	Failure	N/A	Open Biofilter Backwash Waste Valve
Ozone Contactor Calculated LRV – Virus	<120% LRV Goal	<110% LRV Goal	%	Open Biofilter Backwash Waste Valve
Biofilter Individual Effluent Turbidity	0.1	0.15	NTU	Place That Biofilter in Filter To Waste
Biofilter Combined Filter Effluent Turbidity	0.1	0.15	NTU	Place Biofilters in Filter To Waste
GAC Combined Effluent TOC, instantaneous online analyzer	4.0	5.0	mg/L	Divert SWIFT Water
UV Reactor Dose	<120% of Dose Setpoint	<105% of Dose Setpoint	%	Divert SWIFT Water
GAC Combined Effluent Nitrite	0.25	0.50	mg/L-N	Divert SWIFT Water
SWIFT Water TN	4.5	5.0	mg/L-N	Divert SWIFT Water
Ozone dose	70	80	lbs/day	Place Biofilters in Filter To Waste
Tasting System Free Chlorine CT	<110% of Required CT	<100% of Required CT	mg-min/L	Shut Down Tasting System
Tasting System Total Ammonia	0.1	0.3	mg/L-N	Shut Down Tasting System

Table 5. Critical Control Points for the SRC

		Maximum Contaminant				July 2022			August 2022		S	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Regulatory Parameters													
Total Nitrogen (TN)	mg/L	NA	0.50	Daily ³	3.41	5.02	30	2.51	4.51	28	2.71	3.73	26
NO ₃	mg/L	10	0.20	Daily ³	3.13	4.30	29	2.36	3.99	28	2.56	3.73	24
Turbidity	NTU	NA	0.01	Continuous					Figure 1				
Total Organic Carbon (TOC)	mg/L	NA	1.00	3x/Wk ³	3.28	3.91	21	2.81	3.20	21	2.99	3.21	18
рН		NA	NA	Continuous					Figure 2				
TDS⁴	mg/L	Potomac Aquifer System Range: 694-8,720	2.5	Monthly		570	1		566	1		610	1
Disinfection Byproducts													
Bromate	μg/L	10	0.15	Monthly		2.04	1		1.71	1		3.66	1
Trihalomethanes													
Bromodichloromethane	μg/L		1.00	Monthly		2.19	1		2.56	1		2.58	1
Bromoform	μg/L		1.00	Monthly		5.17	1		6.73	1		7.85	1
Dibromochloromethane	μg/L		1.00	Monthly		6.22	1		7.59	1		7.49	1
Total Trihalomethanes	μg/L	80				13.6	1 1		16.9	1		17.9	1
HAAs Dichloroacetic acid	/!		0.60	Manthly	I	2.2	1		2.7	1		2.4	1 1
Trichloroacetic acid	μg/L		0.60 0.20	Monthly Monthly		<0.20	1		0.74	1		2.1 0.5	1 1
Monochloroacetic acid	μg/L μg/L		0.60	Monthly		<0.60	1 1		<1.80	1		<0.60	1
Bromoacetic acid	μg/L μg/L		0.40	Monthly		0.81	1		0.94	1		0.72	1
Dibromoacetic acid	μg/L		0.20	Monthly		5.4	1		7.7 (IA6)	1		6.4	1
Total Haloacetic Acids	μg/L	60	0.20	Wieniny		8.4	1 1		12	1 1		9.7	1 1
Disinfectants ⁵	F-3/ =				I.	-							
Monochloramine (as Cl ₂)	mg/L	4		Continuous	0.01	0.01		0.01	0.01		0.07	0.12	
Chlorine (as Cl ₂)	mg/L	4		Continuous	2.43	2.91		2.48	3.01		2.49	3.17	
Inorganic Chemical	<u> </u>												
Arsenic	μg/L	10	1.00	Monthly		0.58	1 1		<0.50	1		0.59	1
Barium	mg/L	2	0.005	Monthly		0.009	1		0.008	1		0.007	1
Fluoride	mg/L	4.0	0.050	Monthly	0.997	1.09	29	1.02	1.15	28	1.14	1.31	26
Lead	μg/L	15 (action level)	0.10	Monthly		0.16	1		<0.10	1		<0.10	1
Organic Chemicals													
2,4-D	μg/L	70	0.10	Monthly		<0.10	1		<0.10	1		NA	
Dalapon	μg/L	200	1.0	Monthly		<1.0	1		<1.0	1		NA NA	
Picloram	μg/L	500	0.10	Monthly		<0.10	1		<0.10	1		NA NA	
2,4,5-TP (Silvex)	μg/L	50 7	0.10	Monthly		<0.10	1 1		<0.10	1		NA NA	
Dinoseb	μg/L	1	0.10 0.040	Monthly		<0.10 <0.040	1 1		<0.10 <0.040	1		NA NA	
Pentachlorophenol	μg/L		0.040	Monthly		\0.040	<u> </u>		\0.040	<u> </u>		INA	

Table 6. SWIFT Water Quality Monitorin	9	Maximum Contaminant				July 2022	I		August 2022	1	9,	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum Maximum	Numer of Samples	Average ²	Maximum Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Radionuclides													
Beta particles and photon emitters	pCi/L	4 mrem/yr ⁶	4.0	Monthly		14.4	1		12.5	1		10.8	1
Non-regulatory Performance Indicators													
Public Health Indicators		Trigger Limits											
1,4-dioxane	μg/L	1	0.06	Quarterly	0.29	0.30	4.00	0.17	0.22	5	0.17	0.17	4
Tris(2-carboxyethyl)phosphine (TCEP)	ng/L	5,000	10	Quarterly		18	1						
Perchlorate	μg/L	6	0.50	Quarterly		0.57	1						
Perfluorooctanoic Acid (PFOA)	ng/L	70 (PFOA+PFOS)	2.0	Quarterly		9.6	1		11	1		13	1
Perfluorooctanesulfonic Acid (PFOS)	ng/L	70 (PFOA+PFOS)	2.0	Quarterly		2.3	1		2.4	1		2.5	1
Treatment Efficacy Indicators		Trigger Limits											
Cotinine	ng/L	1,000	10	Quarterly		10	1						
Primidone	ng/L	10,000	5.0	Quarterly		7.1	1						
Meprobamate	ng/L	200,000	5.0	Quarterly		15	1						
Sucralose	ng/L	150,000,000	1000	Quarterly		32000	1		30000	1		26000	1
Additional Monitoring (Ozone & UV LRV)				Average	Minimum		Average	Minimum		Average	Minimum	
Ozone Virus LRV				Continuous	4.56	3.98		4.68	3.45		4.58	3.46	
Ozone Giardia LRV				Continuous	2.53	1.86		2.18	1.61		2.14	1.62	
UV Dose Reactor 1	mJ/cm ²			Continuous	>186	>186		>186	>186		>186	>186	
UV Virus LRV Reactor 1				Continuous	>4	>4		>4	>4		>4	>4	
UV Dose Reactor 2	mJ/cm ²			Continuous	>186	>186		>186	>186		>186	>186	
UV Virus LRV Reactor 2				Continuous	>4	>4		>4	>4		>4	>4	

When minimum reporting limits varied during the quarter, the highest minumum reporting limit used is identified.

Contract Laboratory Flags

IA6: Possible matrix interference.

NA: Contract lab analytical error resulted in failed analysis. HRSD was not notified until October 5, 2022.

² Analytical results less than the reporting limit were treated as zero for the purposes of the averaging calculation.

³ Daily samples are typically not collected on days in which there is no or limited recharge. TOC sample collection occurs routinely on Monday through Friday when recharging. Limited or inconsistent recharge impacts the collection of daily samples, particularly for the microbiological ⁴ TDS of the Potomac Aquifer System is based on the averages within the upper, middle and lower Potomac Aquifer as determined during baseline montioring.

⁵ The maximum residual disinfectant level (or MRDL) MCL for monochloramine and chlorine are based on annual averages.

⁶ The measurement unit for beta particles and photon emitters is pCi/L while the MCL is expressed as mrem/yr. Per EPA's Implementation Guidance for Radionuclides (EPA 816-F-00-002, March 2002), the screening threshold for beta particles and photon emitters is 50 pCi/L. If sample concentrations exceed 50 pCi/L, each individual beta particle and photon emitter is converted from pCi/L to mrem using the EPA designated conversion tables, currently available in the referenced document.

Recharge Statistics

The total volume recharged during this operational period was 40.1 million gallons. The backflushed volume was 5.5 million gallons for a net recharge of 34.6 million gallons (Figure 3). Brief backflushing periods occur as part of routine well maintenance on an approximate daily basis. From the start of operation through the end of this reporting period, the SRC has recharged a total volume of 635.6 million gallons.

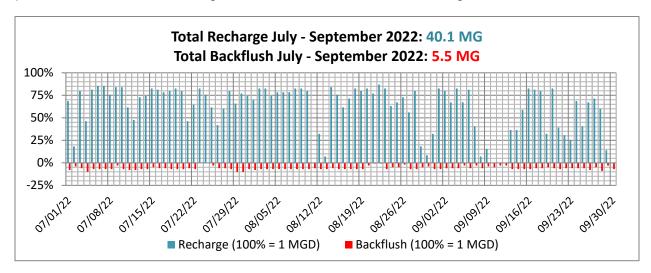


Figure 3: Recharge and Backflush Volumes, July 1 - September 30, 2022

HRSD has developed an internal target to recharge 75% of a SWIFT facility's operational capacity. This is a particularly relevant planning target for full-scale operations and HRSD is striving to meet this target at the SRC. Operational redundancies will exist at full-scale facilities (e.g., multiple recharge wells) which will likely result in a higher rate of recharge at full-scale.

The recharge capacity of TW-1 has slowly diminished since the well rehabilitation completed in Quarter 1 of 2021. To compensate for the reduced injectivity and preserve capacity until NP_MAR_01 is operational the recharge flow to TW-1 has been reduced. The well recharge target was initially adjusted to 600 gallons per minute (gpm, equivalent to 0.864 MGD), down from 700 gpm (~1 MGD) and more recently adjusted to 500 gpm (0.72 MGD). Recharge well capacity will continue to be monitored and the recharge flow will be adjusted as necessary; the SRC 75% target will be evaluated against the adjusted flow. Integration of the new well, NP_MAR_01 into the SRC system is complete and commissioning is underway. Routine operation of the well will begin in October.

Figure 4 depicts the operational activity for this monitoring period identifying the percentage of operational time spent in recharge as well as the general factors precluding recharge.

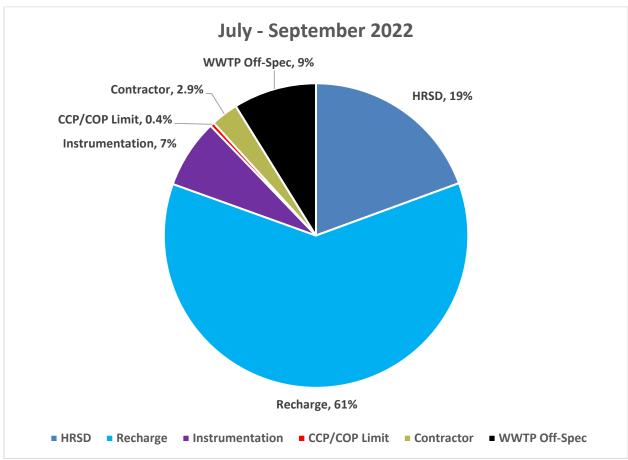


Figure 4: Operational activity for monitoring period. Notes: *Recharge*: Recharge of SWIFT Water; *WWTP Off-Spec*: Influent to the SWIFT facility (wastewater facility secondary clarifier effluent) does not meet influent quality requirements (e.g., elevated TOC or TN, or WWTP repairs; *HRSD*: Broad category covering activity within SWIFT facility that may lead to shut-down (e.g. maintenance and repairs, operational problems); *Contractor*: Recharge suspended to accommodate contractor activity at the AWT and/or recharge well; *CCP/COP limit*: Critical Control Point/Critical Operating Parameter threshold triggered, diverting SWIFT Water from recharge well (e.g., elevated conductivity on SRC influent, elevated TOC/TN in SWIFT Water, low LRV, etc.); *Instrumentation*: On-line analyzer and/or instrumentation maintenance and repair.

Conventional Monitoring Wells

The conventional monitoring well for the upper zone of the Potomac Aquifer (MW-UPA), located approximately 400 ft from the recharge well, has been routinely monitored to detect the arrival of the recharge front. The recharge front arrived at MW-UPA in the fall of 2019 as evidenced by increasing Total Organic Carbon (TOC) concentrations. Travel time to MW-UPA was further confirmed through a bromide tracer study initiated in July of 2020. Bromide from this tracer study was identified in MW-UPA beginning in April 2022, a period in which approximately 230 million gallons of SWIFT Water was recharged.

TOC observations in the monitoring wells located in the middle and lower zones of the Potomac Aquifer (MW-MPA, MW-LPA) remain < 1.0 mg/L. However, a gradual increase

in TOC was observed in MW-MPA in 2021 and 1,4 dioxane has been detected near the reporting limit consistently since late December of 2020 in MW-MPA (Figures 5 and 6). This indicates that the recharge front has reached the MW-MPA. More recently, the SWIFT Advanced Water Treatment system has been optimized to enhance the removal of 1,4 dioxane, routinely achieving concentrations of \leq 0.30 µg/L.

In this monitoring period, three indicator compounds were observed in the conventional monitoring well, MW-UPA: 1, 4-dioxane, sucralose and PFOA. 1,4 dioxane and sucralose have been observed frequently since November 2019. PFOA was first observed in MW-UPA in Quarter 2, 2022. Trend data associated with sucralose, 1,4 dioxane, and PFOA is presented in Figures 6 - 8. All reported values for 1,4 dioxane and sucralose are less than the action thresholds ("trigger values") identified in Table 2 of this report. HRSD is making operational adjustments to the granular activated carbon contactors to increase removal efficiency of PFOA in SWIFT Water. Results for all regulatory parameters are less than the PMCL and all regulated organics were non-detect. Arsenic observations are described in further detail in a subsequent section.

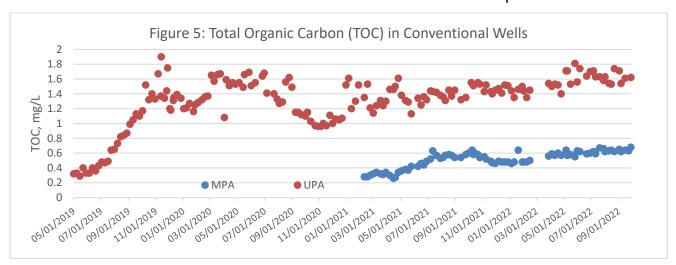


Figure 5: TOC concentration in the Upper and Middle Potomac conventional monitoring wells, MW-UPA and MW-MPA. Based on travel time studies using a conservative tracer, SWIFT Water recharged in the 4th quarter of 2020 reached the MW-UPA in the third quarter of 2022. The SWIFT Water average TOC concentration for October - December 2020 was 2.6 mg/L, with a maximum of 3.9 mg/L (n = 56).

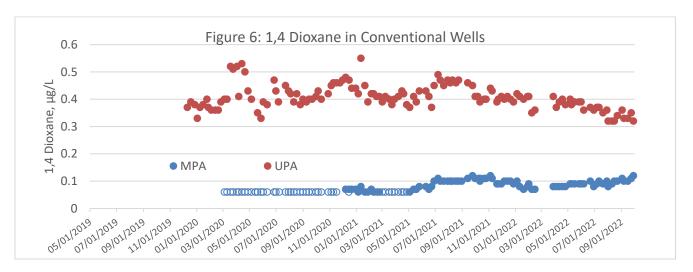


Figure 6: 1,4 dioxane trending in MW-UPA and MW-MPA. Open circles represent data that is less than the reporting limit. Based on travel time studies using a conservative tracer, SWIFT Water recharged in the 4th quarter of 2020 reached the MW-UPA in the third quarter of 2022. The SWIFT Water average 1,4-dioxane concentration for October - December 2020 was 0.32 μ g/L, with a maximum value of 0.41 μ g/L (n = 11). More recently, the SWIFT Advanced Water Treatment system has been optimized to enhance the removal of 1,4 dioxane, routinely achieving concentrations of \leq 0.30 μ g/L.

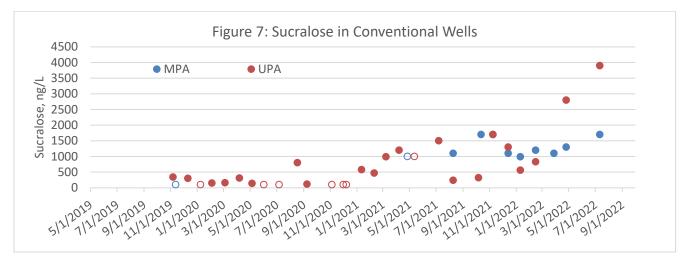


Figure 7: Sucralose trending in MW-UPA and MW-MPA. Open circles represent data that is less than the reporting limit. Based on travel time studies using a conservative tracer, SWIFT Water recharged in the 4^{th} quarter of 2020 reached the MW-UPA in the third quarter of 2022. The SWIFT Water average sucralose concentration for October - December 2020 was 13,000 ng/L, with a maximum value of 16,000 ng/L (n = 2).

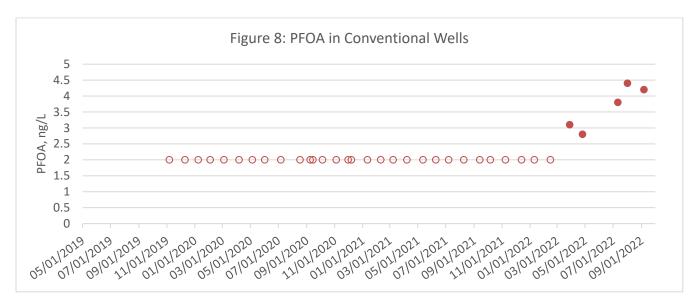


Figure 8: PFOA trending in MW-UPA. Open circles represent data that is less than the reporting limit. Based on travel time studies using a conservative tracer, SWIFT Water recharged in the 4th quarter of 2020 reached the MW-UPA in the third quarter of 2022. The SWIFT Water PFOA concentration for October - December 2020 was 4.5 ng/L (n = 1).

Arsenic in MW-SAT Update

HRSD is monitoring arsenic (As) concentrations in MW-SAT on a monthly frequency, focusing on representative screen intervals 1, 2, 4, 9, 10 and 11. The highest observable arsenic concentration continues to occur in screen interval 9, but remains below the MCL of 10 μ g/L. Concentrations in screen interval 9 remain relatively stable between 2.7 μ g/L and 3.2 μ g/L. These concentrations represent typical conditions for screen interval 9. Other than screen interval 9, arsenic concentration in the remaining monitored screens was < 1.6 μ g/L.

The previous increased As trend observed in screen interval 9 was associated with a decrease in dissolved oxygen (DO) in the SWIFT Water below 3 mg/L for approximately two months. The absence of DO was attributed to the warm summer weather causing an increased oxygen demand in the biofilters and the addition of propane in two of the biofilters which consumed oxygen. It was hypothesized that the drop in oxygen disrupted the conditions that promoted hydrous ferric oxide coatings, a mitigation for As, and along with an increase in TOC caused the release of As. This process of reductive dissolution is documented in the Quarterly Report Q4 2001.

DO concentration in the SWIFT Water during this quarter dropped due to similar conditions and fluctuated from slightly above 4.5 mg/L to a slightly below 0.5 mg/L. While concentrations dropped below 3 mg/L, no increase in As has been observed at any of the screens in MW-SAT.

HRSD will continue monitoring arsenic during recharge in the most transmissive screens of MW-SAT and in the conventional wells as well as DO in the SWIFT Water.

		Maximum Contaminant				July 2022			August 2022		S	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Regulatory Parameters													
Total Nitrogen (TN)	mg/L	NA	0.50	Daily ³	3.41	5.02	30	2.51	4.51	28	2.71	3.73	26
NO_3	mg/L	10	0.20	Daily ³	3.13	4.30	29	2.36	3.99	28	2.56	3.73	24
NO_2	mg/L	1	0.01	Daily ³	<0.01	<0.01	29	<0.01	<0.01	28	<0.01	<0.01	24
Turbidity	NTU	NA	0.01	Continuous					Figure 1				
Total Organic Carbon (TOC)	mg/L	NA	1.00	3x/Wk ³	3.28	3.91	21	2.81	3.20	21	2.99	3.21	18
рН		NA	NA	Continuous					Figure 2				
TDS ⁴	mg/L	Potomac Aquifer System Range: 694-8,720	2.5	Monthly		570	1		566	1		610	1
Microorganisms													
Total Coliform			1	Daily ³	<1	<1	29	<1	<1	28	<1	<1	24
E. coli V	/IPN/100 ml		1	Weekly	<1	<1	29	<1	<1	28	<1	<1	24
Cryptosporidium	oocysts/L	Treatment Technique, MCLG = 0	0.100	Quarterly		<0.100	1						
Giardia lamblia	oocysts/L	Treatment Technique, MCLG = 0	0.100	Quarterly		<0.100	1						
Legionella	/IPN/100 ml	Treatment Technique, MCLG = 0	1	Quarterly		<1	1						
Disinfection Byproducts													
Bromate	μg/L	10	0.15	Monthly		2.04	1		1.71	1		3.66	1
Chlorite	mg/L	1.0	0.100	Monthly		<0.100	1		<0.100	1		<0.100	1
Trihalomethanes													
Bromodichloromethane	μg/L		1.00	Monthly		2.19	1 1		2.56	1 1		2.58	1 1
Bromoform Chloroform	μg/L		1.00 1.00	Monthly		5.17 <1.00	1		6.73	1 1		7.85 <1.00	1 1
Dibromochloromethane	μg/L μg/L		1.00	Monthly Monthly		6.22	1 1		<1.00 7.59	1		7.49	1
Libromochloromothono													

		Maximum Contaminant				July 2022		A	August 2022		S	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
HAAs													
Dichloroacetic acid	μg/L		0.60	Monthly		2.2	1		2.7	1		2.1	1
Trichloroacetic acid	μg/L		0.20	Monthly		<0.20	1		0.74	1		0.5	1
Monochloroacetic acid	μg/L		1.80	Monthly		<0.60	1		<1.80	1		<0.60	1
Bromoacetic acid	μg/L		0.40	Monthly		0.81	1		0.94	1		0.72	1
Dibromoacetic acid	μg/L		0.20	Monthly		5.4	1		7.7 (IA6)	1		6.4	1
Total Haloacetic Acids	μg/L	60				8.4	1		12	1		9.7	1
Disinfectants ⁵													
Monochloramine (as Cl ₂)	mg/L	4		Continuous	0.01	0.01		0.01	0.01		0.07	0.12	
Chlorine (as Cl ₂)	mg/L	4		Continuous	2.43	2.91		2.48	3.01		2.49	3.17	
Inorganic Chemical	-												
Antimony	μg/L	6	2.00	Monthly		<2.00	1		<2.00	1		<2.00	1
Arsenic	μg/L	10	1.00	Monthly		0.58	1		<0.50	1		0.59	1
Asbestos	MFL	7	0.20	Monthly		<0.20	1		<0.20	1		<0.20	1
Barium	mg/L	2	0.005	Monthly		0.009	1		0.008	1		0.007	1
Beryllium	μg/L	4	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Cadmium	μg/L	5	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Chromium (total)	μg/L	100	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Copper	mg/L	1.3 (action level)	0.005	Monthly		<0.005	1		<0.005	1		<0.005	1
Cyanide (total)	μg/L	200	5	Monthly		<5	1		<5	1		<5	1
Fluoride	mg/L	4.0	0.050	Monthly	0.997	1.09	29	1.02	1.15	28	1.14	1.31	26
Lead	μg/L	15 (action level)	0.10	Monthly		0.16	1		<0.10	1		<0.10	1
Mercury	μg/L	2	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Selenium	μg/L	50	5.00	Monthly		<5.00	1		<5.00	1		<5.00	1
Thallium	μg/L	2	0.20	Monthly		<0.20	1		<0.20	1		<0.20	1
Organic Chemicals													
Acrylamide	μg/L	Treatment Technique, MCLG = 0	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Alachlor	μg/L	2	0.099	Monthly		<0.098	1		<0.099	1		<0.098	1
Atrazine	μg/L	3	0.099	Monthly		<0.098	1		<0.099	1		<0.098	1
Benzo(a)pyrene (PAHs)	μg/L	0.2	0.02	Monthly		<0.02	1		<0.02	1		<0.02	1
Di(2-ethylhexyl) adipate	μg/L	400	0.60	Monthly		<0.60	1		<0.60	1		<0.60	1
Di(2-ethylhexyl) phthalate	μg/L	6	0.60	Monthly		<0.60	1		<0.60	1		<0.60	1

		Maximum Contaminant Level (MCL) or MCL Goal (MCLG) where numerical				July 2022			August 2022		Se	eptember 2022	
Parameter	Units	MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Hexachlorocyclopentadiene	μg/L	50	0.099	Monthly		<0.098	1		<0.099	1		<0.098	1
Hexachlorobenzene	μg/L	1	0.099	Monthly		<0.098	1		<0.099	1		<0.098	1
Simazine	μg/L	4	0.069	Monthly		<0.069	1		<0.069	1		<0.068	1
Carbofuran	μg/L	40	0.90	Monthly		<0.90	1		<0.90	1		< 0.90	1
Oxamyl (Vydate)	μg/L	200	1.0	Monthly		<1.0	1		<1.0	1		<1.0	1
Chlordane	μg/L	2	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Endrin	μg/L	2	0.0099	Monthly		<0.0098	1		<0.0099	1		<0.0098	1
Heptachlor	μg/L	0.4	0.039	Monthly		< 0.039	1		<0.039	1		<0.039	1
Heptachlor Epoxide	μg/L	0.2	0.020	Monthly		<0.020	1		<0.020	1		<0.020	1
Lindane	μg/L	0.2	0.020	Monthly		<0.020	1		<0.020	1		<0.02	1
Methoxychlor	μg/L	40	0.099	Monthly		<0.098	1		<0.099	1		<0.098	1
Toxaphene	μg/L	3	0.50	Monthly		<0.50	1		<0.50	1		<0.50	1
PCB Arochlor1016	μg/L		0.08	Monthly		<0.08	1		<0.08	1		<0.08	1
PCB Arochlor1221	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
PCB Arochlor1232	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
PCB Arochlor1242	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
PCB Arochlor1248	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
PCB Arochlor1254	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
PCB Arochlor1260	μg/L		0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Total Polychlorinated Biphenyls (PCBs)	μg/L	0.5		•		<0.10	1		<0.10	1		<0.10	1
2,4-D	μg/L	70	0.10	Monthly		<0.10	1		<0.10	1		NA	
Dalapon	μg/L	200	1.0	Monthly		<1.0	1		<1.0	1		NA	
Picloram	μg/L	500	0.10	Monthly		<0.10	1		<0.10	1		NA	
2,4,5-TP (Silvex)	μg/L	50	0.10	Monthly		<0.10	1		<0.10	1		NA	
Dinoseb	μg/L	7	0.10	Monthly		<0.10	1		<0.10	1		NA	
Pentachlorophenol	μg/L	1	0.040	Monthly		<0.040	1		<0.040	1		NA	
Dioxin (2,3,7,8-TCDD)	pg/L	30	4.00	Monthly		<3.90	1		<4.00	1		<3.80	1
Diquat	μg/L	20	0.40	Monthly		<0.40	1		<0.40	1		<0.40	1
Endothall	μg/L	100	5.0	Monthly		<5.0	1		<5.0 (*+)	1		<5.0	1
Epichlorohydrin	μg/L	Treatment Technique, MCLG = 0	1.0	Monthly		<1.0	1		<1.0	1		<1.0	1
Glycophosphate	μg/L	700	6.0	Monthly		<6.0	1		<6.0	1		<6.0	1
Benzene	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Carbon Tetrachloride	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1

		Maximum Contaminant				July 2022		Į.	August 2022		S	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Chlorobenzene	μg/L	100	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,2-dibromo-3-chloropropane (DBCP)	μg/L	0.2	0.02	Monthly		<0.02	1		<0.02	1		<0.02	1
o-Dichlororbenzene	μg/L	600	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
p-Dichlorobenzene	μg/L	75	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,2-Dichloroethane	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,1-Dichlororethylene	μg/L	7	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
cis-1,2-Dichloroethylene	μg/L	70	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
trans-1,2-Dichloroethylene	μg/L	100	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Dichloromethane	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,2-Dichloropropane	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Ethylbenzene	μg/L	700	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Ethylene Dibromide (EDB)	μg/L	0.05	0.02	Monthly		<0.02	1		<0.02	1		<0.02	1
Styrene	μg/L	100	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Tetrachloroethylene	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Toluene	μg/L	1,000	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,2,4-Trichlorobenzene	μg/L	70	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,1,1-Trichloroethane	μg/L	200	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
1,1,2-Trichloroethane	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Trichloroethylene	μg/L	5	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Vinyl Chloride	μg/L	2	1.00	Monthly		<1.00	1		<1.00	1		<1.00	1
Total Xylene	μg/L	10,000	3.00	Monthly		<3.00	1		<3.00	1		<3.00	1
Radionuclides													
Alpha particles	pCi/L	15	3.0	Monthly		<3.0	1		<3.0	1		<3.0	1
Beta particles and photon emitters	pCi/L	4 mrem/yr ⁶	4.0	Monthly		14.4	1		12.5	1		10.8	1
Radium 226	pCi/L	5 (226+228)	1.0	Monthly		<1.0 (U)	1		<1.0 (U)	1		<1.0 (U)	1
Radium 228	pCi/L	5 (226+228)	1.0	Monthly		<1.0 (U)	1		<1.0 (U)	1		<1.0 (U)	1
Uranium	μg/L	30	0.10	Monthly		<0.10	1		<0.10	1		<0.10	1
Strontium-90	pCi/L	NA	2.0	Monthly		<2.0 (U)	1		<2.0 (U)	1		<2.0 (U)	1
Tritium	pCi/L	NA	1000	Monthly		<1000 (U)	1		<1000 (U)	1		<1000 (U)	1

		Maximum Contaminant				July 2022			August 2022		S	eptember 2022	
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum Report Level ¹	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples
Non-regulatory Performance Indicators													
Public Health Indicators		Trigger Limits											
1,4-dioxane	μg/L	1	0.06	Quarterly	0.29	0.30	4.00	0.17	0.22	5	0.17	0.17	4
17-β-estradiol	ng/L	0.9	0.41	Quarterly		<0.41 (*-)	1						
DEET	ng/L	200,000	10	Quarterly		<10 (^3-)	1						
Ethinyl estradiol	ng/L	280	0.92	Quarterly		<0.920 (*-)	1						
Tris(2-carboxyethyl)phosphine (TCEP)	ng/L	5,000	10	Quarterly		18	1						
NDMA	ng/L	10	2.00	Quarterly	<2.00	<2.00	4	<2.00	<2.00	5	<2.00	<2.00	4
Perchlorate	μg/L	6	0.50	Quarterly		0.57	1						
Perfluorooctanoic Acid (PFOA)	ng/L	70 (PFOA+PFOS)	2.0	Quarterly		9.6	1		11	1		13	1
Perfluorooctanesulfonic Acid (PFOS)	ng/L	70 (PFOA+PFOS)	2.0	Quarterly		2.3	1		2.4	1		2.5	1
Treatment Efficacy Indicators		Trigger Limits											
Cotinine	ng/L	1,000	10	Quarterly		10	1						
Primidone	ng/L	10,000	5.0	Quarterly		7.1	1						
Phenytoin (Dilantin)	ng/L	2,000	20	Quarterly		<20	1						
Meprobamate	ng/L	200,000	5.0	Quarterly		15	1						
Atenolol	ng/L	4,000	5.0	Quarterly		<5.0	1						
Carbamazepine	ng/L	10,000	5.0	Quarterly		<5.0	1						
Estrone	ng/L	320,000	2.1	Quarterly		<2.1 (*-)	1						
Sucralose	ng/L	150,000,000	1000	Quarterly		32000	1		30000	1		26000	1
Triclosan	ng/L	210,000	50	Quarterly		<50	1		<50	1		<50	1
Additional Monitoring (Ozone & UV LRV)				Average	Minimum		Average	Minimum		Average	Minimum	
Ozone Virus LRV				Continuous	4.56	3.98		4.68	3.45		4.58	3.46	
Ozone Giardia LRV				Continuous	2.53	1.86		2.18	1.61		2.14	1.62	
UV Dose Reactor 1	mJ/cm ²			Continuous	>186	>186		>186	>186		>186	>186	
UV Virus LRV Reactor 1				Continuous	>4	>4		>4	>4		>4	>4	
UV Dose Reactor 2	mJ/cm ²			Continuous	>186	>186		>186	>186		>186	>186	
UV Virus LRV Reactor 2				Continuous	>4	>4		>4	>4		>4	>4	

		Maximum Contaminant			July 2022			August 2022			September 2022		
Parameter	Units	Level (MCL) or MCL Goal (MCLG) where numerical MCL not expressed. Values noted for indicator compounds are non- regulatory screening values	Minimum	Required Monitoring Frequency	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples	Average ²	Maximum	Numer of Samples

¹ When minimum reporting limits varied during the quarter, the highest minumum reporting limit used is identified.

Contract Laboratory Flags

IA6: Possible matrix interference.

U: Results less than the sample detection limit.

*-: LCS and/or LCSD is outside acceptance limits, low biased.

*+: LCS and/or LCSD is outside acceptance limits, high biased.

^3-: Repoting Limit Check Standard is outside acceptance limits, low biased.

NA: Contract lab analytical error resulted in failed analysis. HRSD was not notified until October 5, 2022.

² Analytical results less than the reporting limit were treated as zero for the purposes of the averaging calculation.

³ Daily samples are typically not collected on days in which there is no or limited recharge. TOC sample collection occurs routinely on Monday through Friday when recharging. Limited or inconsistent recharge impacts the collection of daily samples, particularly for the microbiological samples collected for total coliform and E coli which have limited holding time requirements. In July, limited or no recharge impacted two days of sampling. In August, limited or no recharge impacted three days of sampling. In September, limited or no recharge impacted six days of

⁴ TDS of the Potomac Aquifer System is based on the averages within the upper, middle and lower Potomac Aquifer as determined during baseline montioring.

⁵ The maximum residual disinfectant level (or MRDL) MCL for monochloramine and chlorine are based on annual averages.

⁶ The measurement unit for beta particles and photon emitters is pCi/L while the MCL is expressed as mrem/yr. Per EPA's Implementation Guidance for Radionuclides (EPA 816-F-00-002, March 2002), the screening threshold for beta particles and photon emitters is 50 pCi/L. If sample concentrations exceed 50 pCi/L, each individual beta particle and photon emitter is converted from pCi/L to mrem using the EPA designated conversion tables, currently available in the referenced document.



Environment Testing Eaton Analytical

10/21/2022

Hampton Roads Sanitation District Li Zhang 1432 Air Rail Avenue Virginia Beach, VA 23455

RE: EPA 515.3 Lab Error

Hampton Roads Sanitation District samples SRC_NP_SCE, collected 09/06/22 (job 810-36341-1), SRC_NP_RWI, collected 09/06/22 (job 810-36344-1) and SRC_SWIFT, collected 09/06/22 (job 810-36348-1) were subcontracted to Eurofins Eaton Analytical, LLC South Bend (EEA-SB) from Eurofins Eaton Analytical, LLC Monrovia. These samples were received at EEA-SB on 09/07/22. The samples were extracted on 09/19/22.

During the sample extract phase of EPA 515.3, diazomethane is used for derivatization. When preparing the diazomethane for the method, the sample prep technician used a sodium hydroxide solution instead of a potassium hydroxide solution. The solution appeared acceptable turning yellow, but had other characteristics that should have indicated that an error was made. Due to the sample prep technician being inexperienced they did not realize the error was made and did not make anyone else aware. The error was discovered after the analysis, when the lab began investigating the reasons for the failing analysis batch.

Sample prep technician has been further trained on what to look for when preparing the diazomethane.

The lab notified client services of the issue on 09/22/22. The customer was not notified of the issue until 10/05/22. The reasons for this were due to shortage of staff, a doubling of sample load during the month of September and a possibly bug from the LIMS that did not get the notification to all project managers. At this time EEA-SB has additional job postings, actively interviewing and has made some strides in reducing the backlog with existing staff. We are still investigating the notification issue from the LIMS.

Sincerely,

Bill Reeves

Bill Reeves
Quality Assurance Manager
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574-472-5568