The Potomac Aquifer Recharge Oversight Committee Meeting Minutes September 10, 2020

Electronic Meeting in Accordance with Chapter 1283 of the 2020 Acts of Assembly

In attendance: David Paylor, DEQ; Mark Bennett USGS; David Campbell, USEPA; Harold Post for Adil Godrej, OWML; Whitney Katchmark, HRPDC; William Mann, Governor Appointee; Marcia Degen for Norman Oliver, VDH; Doug Powell, Governor Appointee; Gary Schafran, PARML; and Mark Widdowson, PARML.

The Committee Chair, David Paylor, called the meeting to order at 1 pm.

Doug Powell made a motion to approve the minutes of the previous meeting as distributed; Marcia Degen seconded the motion; and it carried unanimously.

Gary Schafran, co-director of the Potomac Aquifer Recharge Monitoring Lab (PARML), made a <u>presentation</u> on the activities of the lab including renovation, hiring, instrument acquisition, development of technical working committees, and update to the 2021 work plan. Mr. Powell moved approval of the report and support of the formation of the technical committees; Dr. Mann seconded the motion.

Whitney Katchmark asked for clarification of the motion as to whether HRSD was to be considered a member or a resource of the technical committees. After a brief discussion, the motion was amended to agree to formation of the two committees with HRSD as a resource rather than a member of the committee. The motion passed without objection.

Charles Bott (HRSD) made a <u>presentation</u> on continued operations, data updates, update on research topics, and future planning at the SWIFT Research Center. Dr. Bott further explained biological fouling and recharge well installation in answer to committee member's question.

Jamie Mitchell (HRSD) provided an <u>update</u> on the status of the James River Treatment Plant fullscale SWIFT facility individual UIC permitting. She reviewed comments received from National Water Research Institute (NWRI) and the Virginia Department of Health (VDH) that will require significant changes to the draft permit; reviewed aquifer monitoring plan comments and outlined next steps. The comment responses and modified draft permit documents will be available for Committee review by September 18. Dr. Degen asked about the size of the private wells that were reviewed. Jamie Mitchell and Dan Holloway responded the wells were less than 35-feet deep, non-potable irrigation wells.

Lauren Zuravnsky (HRSD) provided an <u>update</u> on the SWIFT Full-Scale schedule and implementation plan.

The Potomac Aquifer Recharge Oversight Committee Draft Meeting Minutes September 10, 2020

Dan Holloway (Jacobs) provided an <u>update</u> on modeling background, process, scenarios, observations and results. He further explained daily recharge rate and assumption of 75% level of performance, and the break-even rate.

There were no public comments.

A poll will be sent to members for availability for the next meeting date.

The meeting adjourned at 3:13 pm.

Approved: David Paylor, Committee Chain

Date:

1/20/2021

Committee Members:

- David Paylor, Director of Virginia DEQ.
- Dr. Norman Oliver, Virginia State Health Commissioner

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- Dr. William Mann, Governor Appointee
- Doug Powell, Governor Appointee
- Whitney Katchmark, HRPDC
- Adil N. Godrej, PhD, PE, Co-Director Occoquan Watershed Monitoring Laboratory
- Mark Widdowson, Co-Director of the Potomac Aquifer Recharge Monitoring Lab
- Gary Schafran, Co-Director of the Potomac Aquifer Recharge Monitoring Lab
- Mark Bennett, Director of Virginia and West Virginia Water Science Center
- Dave Campbell, Director of the US EPA Region 3 Laboratory Services and Applied Science Division

Potomac Aquifer Recharge Monitoring Laboratory Update

Gary Schafran and Mark Widdowson PARML Co-Directors

September 10, 2020

Update:

- Laboratory renovation
- PARML hiring
- Laboratory instrument acquisition
- Development of technical working groups
- Workplan

PARML Water Quality Laboratory – Renovation Schedule

- Bidding & Contract Awarded May 2020
- Construction & Inspections June
- Casework Installed July/August
- Projected Completion August



WF WF











New Hires

PARML Research Associate

Seyyedhadi "Hadi" Khatami, Ph.D.

B.S. and M.S. in Chemical Engineering Ph.D. in Chemistry and Biochemistry

Strong background in organic analytical chemistry including GC-FID, GC-MS, Solid and liquid's NMR, ESI-FTICR-MS, FTIR, EA and HPLC PARML Research Faculty – Senior Research Associate

Eduardo "Ed" Mendez, Ph.D.

B.S. (UNH) and M.S. (VT) in Environmental Engineering Ph.D. in Civil Engineering (VT)

Extensive experience in developing computer tools and models for solving groundwater problems, programming languages, and building groundwater applications

Proposal to Develop Informal Technical Advisory/Working Groups

As we have moved forward with establishing the laboratory we have recognized the value of engaging key players (e.g., VDH, DEQ, USGS, HRSD, other technical experts) in this effort. We feel that if we did so in a more intentional manner, that significant benefit to the PARML mission would accrue from collaborative dialogues.

- Two working groups envisioned each with 10 members, or less;
- Meetings would be concise, agenda driven, and bimonthly to quarterly;
- Participants would include those with technical and/or regulatory backgrounds relevant to water reuse and aquifer recharge and able to help guide decision making for current and future monitoring, modeling, research, and analytical development.

Water Quality/Analytical Technical Advisory Group

- Issues related to monitoring across the SWIFT treatment process train and changes in composition;
- Recommend priority order of WQ monitoring (parameters) as laboratory capability ramps up;
- Method development for disinfection byproducts not currently regulated – but possibly headed in that direction;
- Identify future CECs potentially headed for regulatory action.

Members: PARML, VDH, DEQ, HRSD, PAROC

Groundwater Technical Advisory Working Group:

- Review groundwater sampling and monitoring plans for the SWIFT RC and full-scale SWIFT recharge at James River
- Identify data gaps and evaluate options for improved monitoring of the Potomac Aquifer
- Coordinate efforts on regional monitoring and data analysis

Members: PARML, DEQ, USGS, VDH, HRSD, PAROC

Work Plan 2021 (Slides from last PAROC Mtg)

- Develop laboratory analytical capabilities
 - Instrumentation acquisition and method development
- Sampling and analysis of SWIFT WATER and SWIFTRC groundwater
 - Comparison to HRSD monitoring data
- Website Development
 - Public outreach
 - Regional groundwater levels
- Develop methodology and capability for archiving water and aquifer samples

Work Plan 2021 (Continued)

- Groundwater Investigations at SWIFTRC
 - Bromide tracer test September 28th ?
 - Analysis of groundwater monitoring data
 - Flowmeter testing







Questions?

Operations Update





SWIFT Research Center (SRC)

(1.0 MGD AWT + recharge well + monitoring wells + public outreach and education center + research facilities + operations staff training center)





Agenda

- Some SRC Data Updates
- TW-1 injectivity & RW-1 project
- 1,4-Dioxane & propane plans



SWIFT Research Center – Process Flow Diagram



SWIFT RESEARCH CENTER PROCESS FLOW DIAGRAM





Swift TOC Removal – BAF and GAC









NDMA – SWIFT Water and MW-UPA





SWIFT Research Center – Process Flow Diagram



SWIFT RESEARCH CENTER PROCESS FLOW DIAGRAM

TW-1 (SRC Recharge Well Injectivity)





Preliminary conclusions:

- SWIFT Water "TSS or turbidity" is not the cause
- SWIFT Water Fe precipitation is not the cause instant or delayed
 - -There may have been short periods of elevated SWIFT Water Fe in 2018 and 2019 following GAC contactor shutdowns.
- Precipitation of other salts (e.g. CaCO₃) from SWIFT Water is unlikely
- Air entrainment in the well is unlikely
- Ineffective backflushing due to low flow rate may be a factor
- Remaining possibilities:
 - -Biological fouling new evidence suggests this is a strong possibility
 - -Disruption of clay minerals
 - -Interaction of SWIFT Water with aquifer materials resulting in precipitation of ?



- Approved by EPA to install new "full-scale" recharge well at Nansemond – RW-1

- Rehabilitate the existing recharge well (TW-1)
- No change in SWIFT Water flow (1 MGD)





RW-1 Proposed Location

Pros	Cons
Least amount of yard piping (~155')	Impacts previously permitted BMP
Proximity to research center	Proximity to TW-1 (~95')
Proximity to MW-SAT	Potential disruption to monitoring plan
	Potential disruption to operations





RW-1 Installation

- Drill pilot boring to 1,450
- Run geophysical log to total depth of pilot boring
- Collect formation sample for grain size distribution analysis
- Design well screen slot size, filling, and filter pack
- Ream pilot boring for 30-inch casing
- Install casing and run gyroscopic plumbness and alignment survey before grouting
- Drill 24-inch diameter borehole using reverse-circulation method
- Develop RW-1, mechanical, chemical, over-pumping, disinfection, and video survey
- Conduct step test, 24-hour constant rate test, and flowmeter logging
- Condition screen intervals using 0.1 M ACH solution & remove treatment solution
- Conduct post ACH step test and flowmeter log





RW-1 Design

- Casing and screen assembly measures 18-inches in diameter
- Type 316 stainless steel casing
- Accommodates backflush pump capable of producing 1,800 to 2,100 gpm
- 18-inch casing accommodates 2 to 3 access tubes
- Also, an access tube will extend down outside of casing
- Muni-Pak type screen
- RW-1 screens same intervals as TW-1





RW-1 Process Mechanical Arrangement

- Well column & well annulus recharge capability
- Orifice plate in lieu of downhole control valve for well column hydraulics control
- Borehole flow meter





Swift RW-1 Piping Integration


SRC 1,4-Dioxane Profile (2019-2020)





SWIFT Research Center – Improving 1,4-dioxane removal



SWIFT RESEARCH CENTER PROCESS FLOW DIAGRAM



BAC/GAC Pilot – Co-metabolic removal of 1,4-dioxane using tetrahydrofuran or propane





THF



Intuitech™

Suift Pilot testing – Enhancing 1,4-dioxane removal with THF and propane addition





Preliminary propane data are very encouraging





Biofilter Pilot – Propane Column





Propane Full Scale SRC Testing

- Goal: Feed propane at a dose of 1-5 mg/L to Biofilters 1 and 3
- Use Biofilters 2 and 4 as controls
- Main concern: Volatilization of propane into the air





orrow





NIOSH limit: 1,000 ppmv



Bromate is well controlled at the SRC by the addition of preformed monochloramine, but this limits 1,4-dioxane removal through ozonation





HRSD 1,4-dioxane (µg/L) SCE data

	ABTP	BHTP	JRTP	VIPTP	WBTP	YRTP
Min	0.48	0.55	0.74	0.49	0.52	0.34
Max	0.68	0.74	1.6	2.2	0.71	0.66
Average	0.56	0.64	1.12	0.93	0.61	0.48

James River SWIFT – Improving 1,4-dioxane removal (0.35 µg/L treatment objective)



Results demonstrate value of Ozone/H₂O₂ for improving 1,4-dioxane removal while adequately controlling bromate formation. Also multi-point FBD should be considered.

		_	Bromate Formed (µg/L)			1,4-dioxane % Removed		
		O3:TOC	0.5	0.8	1.1	0.5	0.8	1.1
Day 1- Br: 0.419 mg/L,	No Bromate control	Sidestream	5.84	16.9	42.4	24	48	60
TOC: 6.2 mg/L,		Fine Bubble	14.8	35.8	68.1	44	60	66.4
Influent 1,4-dioxane:	3 mg/L Preformed	Sidestream	1.41	4.14	10.4	28	36	52
2.5 µg/L	Monochloramine	Fine Bubble	1.29	5.82	11.9	28	36	48
	1.5:1 H2O2:O3	Sidestream	2.43	9.53	18.9	36	60	77.6
		1 Diffuser FBD	3.36	6.28	23.8	48	63.6	81.2
		2 Diffuser FBD	1.26	2.38	4.47	61.2	79.6	92.4
Day 2- Br: 0.389 mg/L,				1 00			۲1	
TOC: 6.6 mg/L,	1.1 EZU2:03			4.00			51	
Inf 1,4-D: 1.36 µg/L		2 Diffuser FBD		4.56			82	

Influent 1,4-dioxane spiked in feed tank (YR 1,4-dioxane has been ~0.4 μ g/L lately) YR bromide roughly 2x JR bromide, YR Denite TOC comparable to JR floc-sed effluent TOC O₃:TOC is NO₂ corrected

James River SWIFT – Improving 1,4-dioxane removal



Permitting Update





JR UIC Draft Permit Development

- SWIFT Water Quality Targets and the Aquifer Monitoring and Contingency Plan formed the basis of the permit application responses
 - Document provided for review and comment to NWRI and the PAROC
 - oNext steps: finalize construction schematics for the
 - recharge and monitoring wells
 - oSubmit application by end of October



- Largely focused on areas of additional research at the SWIFT Research Center
 - Process unit validation of Log Reduction Values for viruses, Cryptosporidium and Giardia
 - HRSD had validated process units at the pilot scale in 2016 with challenge testing
 - Challenge testing difficult with an operational recharge well
 - Low concentrations in the feed to the SWIFT facility make it difficult to quantify the LRVs necessary for each unit process
 - In discussions with NWRI panelists, we identified tools that would support such an evaluation
 - Virus Indicator: Pepper Mild Mottle Virus
 - Evaluating Cryptosporidium and Giardia using different techniques and looking at Clostridium perfringens as a protozoan indicator Sustainable Water Initiative for Tomorrow
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- In discussions with NWRI panelists, we identified tools that would support such an evaluation
 - Virus Indicator: Pepper Mild Mottle Virus
 - Evaluating Cryptosporidium and Giardia using different techniques and looking at Clostridium perfringens as a protozoan indicator
 - Reminder of LRVs targeted. Very conservative using SDWA as a basis for pathogen crediting
 - Acknowledge greater removal is likely occurring

Parameter	Floc/Sed (+BAF)	Ozone	BAF+GAC	UV	Cl2	SAT	Total
Enteric Viruses	2	0	0	4	0	6	12
Cryptosporidium	4	0	0	4	0	6	14
Giardia	2.5	0	0	4	0	6	12.5



- Significant Changes to UIC Documents
 - Provided additional narrative on the SWIFT program, piloting and the Research Center with emphasis on the scope of monitoring and areas of research
 - Added Male Specific and somatic coliphage as a monitoring requirement for SWIFT Water
 - Modified the monitoring well construction plan
 - Original included sampling from one targeted depth in the Upper Potomac and one targeted depth in the Middle Potomac
 - Panelists felt multi-depth sampling was important to capture recharge flow in case the flow paths were disrupted (e.g., clogging at the recharge well) – this was also a comment from the PAROC
 - The monitoring well screens will mirror the nearest recharge well



- Significant Changes to UIC Documents
 - Additional monitoring added:
 - Unregulated Contaminant Monitoring Rule
 - Hexavalent chromium and additional PFAS monitoring related to the legislative action
 - NDMA formation potential (FP) monitoring
 - Frequency and duration of monitoring will vary depending on mode of well protection (free chlorine vs monochloramine)
 - Phased reduction contingent upon NDMA concentrations in monitoring wells and in FP tests remaining < 10 ng/L
 - All NDMA FP data will be evaluated by PARML and PAROC to ensure concurrence with phased reductions



- NDMA FP frequency and duration
 - Monochloramine more likely to contribute to NDMA formation than free chlorine necessitating different approaches to NDMA FP monitoring frequency
 - Monochloramine:
 - Year 1: Monthly monitoring
 - Years 2 3: Quarterly monitoring
 - Years 4 10: Annual monitoring
 - Free chlorine
 - Monthly monitoring for 1st three months
 - Critical Control Point added to ensure ammonia is controlled at the GAC Combined Effluent
 - Phased reductions must meet the contingency requirements
 - Monitoring frequency resets if contingency requirements not met Sustainable Water Initiative for Tomorrow



PMCL Compliance

- Modified language to ensure that in the event a sample result indicated the potential for a PMCL violation, that SWIFT Water was diverted from the recharge well until confirmation testing could be completed
- PMCL compliance evaluation varies depending on if the parameters is evaluated on a Running Annual Average (RAA) or a Single Instance Limit
 - RAA: inorganic chemicals (antimony, arsenic, barium, beryllium, cadmium, chromium, fluoride, mercury, nickel, selenium, and thallium), asbestos, organic chemicals, and disinfection byproducts
 - Single Instance: nitrate and nitrite, radionuclides



RAA Calculations

- For constituent groups with a minimum sampling frequency period of "Monthly", the RAA will consist of an average of 12 equally-weighted "single monthly values", with each single monthly value representing the average of all data points collected during the corresponding calendar month.
- For constituent groups with a minimum sampling frequency period of "Quarterly", the RAA will consist of an average of 4 equally-weighted "single quarterly values", with each single quarterly value representing the average of all data points collected during the corresponding quarter.



- Potential Exceedance: Next Steps
- HRSD will divert water from the recharge well and confirm the analysis
- If PMCL exceedance is confirmed, HRSD will notify EPA and the PAROC and initiate an investigation, take corrective action, and perform follow-up sampling to demonstrate that corrective actions have been effective and the RAA is reduced to below the PMCL
- Once a PMCL violation has occurred and SWIFT water has been diverted, HRSD may collect follow-up samples no more frequently than once per day. Each time a sample is measured, the single monthly value and RAA will be re-calculated. Once the RAA is reduced to below the PMCL, the facility is no longer in violation and may resume recharge (and submit a report to VDH and PAROC within 14 days).
 - -Data collected during the PMCL shutdown is not to be omitted from future compliance calculations

Aquifer Monitoring Plan Comments

- Monitoring well design as mentioned previously
- Construction modification to include bentonite seals in annular space between the aquifers
- •Area of Review figure:
 - Information on the well users in the vicinity of JR SWIFT
 - Further investigation with help of VDH concluded that only three of the private wells identified within the AOR were actually constructed and all wells were shallow wells



Next Steps

- Comments wrapped up
- •Will send comment response document and modified documents for review by 9/18
 - Acknowledging that construction schematics from new well team still in progress
 - Well schematics will be sent to DEQ for review prior to submitting to EPA with the permit application

Full Scale Implementation Program Update



Lauren Zuravnsky, P.E. Chief of Design & Construction - SWIFT Potomac Aquifer Recharge Oversight Committee September 10, 2020





Reaching the end of best value, design-build procurement for combined James River projects.









Well services design team has been added to SWIFT Full-Scale Implementation Program structure.



Initiating preliminary design phase to convey and treat Boat Harbor wastewater at Nansemond TP









for Tomorrow

2020 Regional Modeling Presentation to Potomac Aquifer Recharge **Oversight Committee**

HRSD

June 2020



- Purpose/objects of meeting
- Model background
- Modeling process
- Model scenarios
- Results


Purpose: Update modeling with latest information

- Previous modeling was performed in Phase 1 (2014) and Phase 2 (2015)
 - Fatal Flaw Analysis 7 SWIFT sites, on all at once
 - Prior to 2016/17 Groundwater Withdrawal Permit reductions
- New model runs provide updated conditions
 - Latest model calibration incorporated (Dec 2019)
 - Latest Reported Use withdrawals incorporated
 - Latest permit amounts (2016/17 reductions incorporated)
 - Changes in understanding of SWIFT
 - 5 SWIFT sites
 - 75% Recharge Up-time
 - Phased start-up





- Coastal Plain Aquifer System
- Groundwater flow
- Coastal Plain Model



North Atlantic Coastal Plain Aquifer System



Virginia Coastal Plain Aquifer System Geometry

- Fall Zone to the Ocean
- Wedge shaped that widens and dips toward the east
- "Layer Cake" geology
- 2,000 feet of unconsolidated sediments (gravels, sands, silts, clays, shells).
- Horizontally stacked aquifers
 - Unconfined
 - Confined



SW

Sustainable

Virginia Coastal Plain Aquifer System



Ground Water Hydrology



for Tomorrow

USGS, Basic Groundwater Hydrology, 1982

Hydraulics in the Coastal Plain Aquifers



Sustainable Water Initiative for Tomorrow

Potomac Aquifer Cones of Depression





Groundwater Flow Modeling

- Model represents a real system
- Conceptual Model of the groundwater system
- Numerical Model used to make predictions/understand stresses on the groundwater system - i.e. MODFLOW



Coastal Plain Ground Water Model

- Physical configuration of aquifer system
 - Location
 - Aerial extent
 - Aquifer thickness
- Hydraulic Properties
 - Transmissivity
 - Storage Coefficient
 - Leakance
- Boundary Conditions
 - Recharge
 - No flow
 - Lateral flow
- Ins and Outs
 - Withdrawal wells
 - Recharge zones



Conceptual model



Figure 2. Example of model grid for simulating threedimensional ground-water flow.



Current Coastal Plain Ground Water Model

- USGS new model in 2009 (Heywood and Pope)
 - USGS updated Hydrogeology in 2006 (McFarland and Bruce)
 - Higher resolution
 - CBIC implicit
 - Density dependent module (simulate saltwater migration
- DEQ (Aquaveo) modified for GW Permit Program



Modeling Process

- Model baseline withdrawal scenarios
 - 2018 Reported Use
 - Total Permitted Use
- Run SWIFT recharge scenarios with one of the withdrawal scenarios
- Evaluate the benefits/impacts of SWIFT Recharging scenarios against baseline
 - Water level impacts
 - Critical surface impacts





SWIFT 2020 Modeling Scenarios

- All scenarios are modeled with phased start-up
- All SWIFT sites are recharging at 75% of the target capacity
- All scenarios are transient (time steps) run 180 yrs and extend 50 years into the future (2070)
- All scenarios are modeled under withdrawal conditions
 - Total Permitted scenarios are using the currently permitted capacity for permitted withdrawals (no ramp up in withdrawals)
 - 2018 Reported Use scenarios are using the reported use for permitted withdrawals (with no increase in withdrawals)



SWIFT 2020 Modeling Scenario Descriptions

- 1) 2018 Reported Use Scenario with SWIFT.
- 3) Total Permitted Scenario with SWIFT.
- 2) Total Permitted Use with JCSA and West Point at previous (2014) permitted amounts with SWIFT.
- 2 a) 2018 Reported Use Scenario with JCSA and West Point at previous (2014) permitted amounts with SWIFT.



SWIFT Scenario 1

2018 Reported Use with SWIFT



SWIFT Scenario 3

Total Permitted Use with SWIFT



SWIFT Scenario 2 and 2A

JCSA/West Rock scenarios

SWIFT Scenario 2 and 2a

- Large Groundwater Withdrawal Permit reductions in 2016/17, mostly paper cuts
- JCSA and West Point permitted withdrawal amounts were lowered with 2016/17 Groundwater Withdrawal Permits (by end of permit term)
- Scenarios 2 and 2a model JCSA and West Point at their withdrawal permit limits previous to the 2016 reductions (2014 permit limits)
- Scenario 2 uses a Total Permitted Use withdrawals
- Scenario 2a uses 2018 Reported Use withdrawals



SWIFT Scenario 2

JCSA/West Rock at 2014 Permitted amounts all others at Total Permitted withdrawal amount





SWIFT Scenario 2A

JCSA/West Rock at 2014 Permitted amounts all others at 2018 Reported Use withdrawal amount





- Modeling indicates SWIFT is single largest beneficial impact to the Potomac Aquifer System pressure (all SWIFT scenarios)
 - Water levels
 - Critical cells
- Model scenarios 2 and 2A indicate that SWIFT resolves JCSA/West Point related critical cell failures



Hydrographs for JCSA/West Rock

Hydrograph at Critical Cell Failure near IP Pumping Center

- Includes all six scenarios
- Critical cell failure without SWIFT
 - Continues to 2070 under Total Permitted scenario
 - Improved but continues 2070 as failure under Reported Use scenario
- Critical cell failure relieved under all SWIFT scenarios
 - Reported Use scenarios by ~2030 (even with JCSA/WP at 2014 pumping)
 - Total Permitted Use scenarios by ~ 2038 (even with JCSA/WP at 2014 pumping)







Potomac Aquifer Water Levels WEST of International Paper - Franklin Mill - Row 119, Column 22



Hydrograph at Critical Cell Failure near IP Pumping Center

- Almost identical response for Total Permitted withdrawal Scenarios (1 and 2)
- Almost Identical response for Reported Use withdrawal Scenarios (3 and 2A)
- Model indicates the temporal impact of SWIFT is the same for with/without 2014 permit reductions for JCSA and West Point
- Model indicates the magnitude of the benefit is the same for with/without 2014 permit reductions for JCSA and West Point



Hydrograph at JCSA Pumping Center

- Includes all six scenarios
- No critical cell failure






Hydrograph at West Rock Pumping Center

- Includes all six scenarios
- No critical cell failure







Hydrograph at International Paper Pumping Center

- Includes all six scenarios
- No critical cell failure







JCSA/West Rock Observations

- WITHOUT SWIFT water levels appear to be stable, but show no recovery after 2017
- Modeling indicates that critical cell failure is avoided with SWIFT for either withdrawal condition – Reported Use or Total Permitted Use
- Modeled beneficial impacts of SWIFT are identical for both JCSA/West Rock withdrawal scenarios (2017 permit limits, 2014 permit limits)
- Recovery starts 2026-2027
- S-curve water level recovery observed



Questions?



