

**City of Alexandria's Semi-Annual Report**  
**ATG-Oronoco Site Summary**  
**January 1, 2025 to June 30, 2025**

This Semi-Annual Report summarizes site remedial activities for the former Alexandria Town Gas – Oronoco manufactured gas plant site (ATG-Oronoco) as described in Appendices A, B, and C of the Consent Decree between Potomac Riverkeeper Network and the City of Alexandria, Virginia, as filed January 9, 2024 in the U.S. District Court for the Eastern District of Virginia (Case No. 1:22-cv-00506-CMH-WEF).

August 29, 2025

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## Acronyms / Abbreviations

ATG	Alexandria Town Gas
City	City of Alexandria
CIPP	Cured-in-Place Pipe
DEQ	Department of Environmental Quality
DNAPL	Dense non-aqueous phase liquid
ft	Feet
ft bgs	Feet below ground surface
LSS	Lee Street Square commercial/office townhouse complex
MGP	Manufactured Gas Plant
NAPL	Non-aqueous phase liquid
PAH	Polycyclic Aromatic Hydrocarbons
RTN	Robinson Terminal North
Site	Alexandria Town Gas (ATG)-Oronoco Site
TarGOST	Tar-specific Green Optical Screening Tool
USEPA	United States Environmental Protection Agency
VRP	Voluntary Remediation Program

# 1 Introduction

This Semi-Annual Report summarizes site activities at the former Alexandria Town Gas – Oronoco (ATG-Oronoco) Manufactured Gas Plant site (the “Site”) in accordance with the Consent Decree between Potomac Riverkeeper, Inc. and the City of Alexandria, entered by the United States District Court for the Eastern District of Virginia on January 9, 2024. This summary covers the period from January 1, 2025, to June 30, 2025. The site of the former manufactured gas plant (MGP) is in the Old Town section of the City of Alexandria, Virginia, at the southeast corner of North Lee and Oronoco Streets (**Figure 1**). The Site boundaries also include the Oronoco Street right-of-way (R/W) from the North Lee/Oronoco Street intersection, eastward to the Potomac River. Since 2000, the City has been implementing a long-term remediation plan for the Site in coordination with the Virginia Department of Environmental Quality’s Voluntary Remediation Program (VRP Site No. 00241). The actions documented in this Semi-Annual Report complement the City’s long-standing remediation plan and, together, are intended to remediate the effects of historical pollution at the Site as soon as practicable.

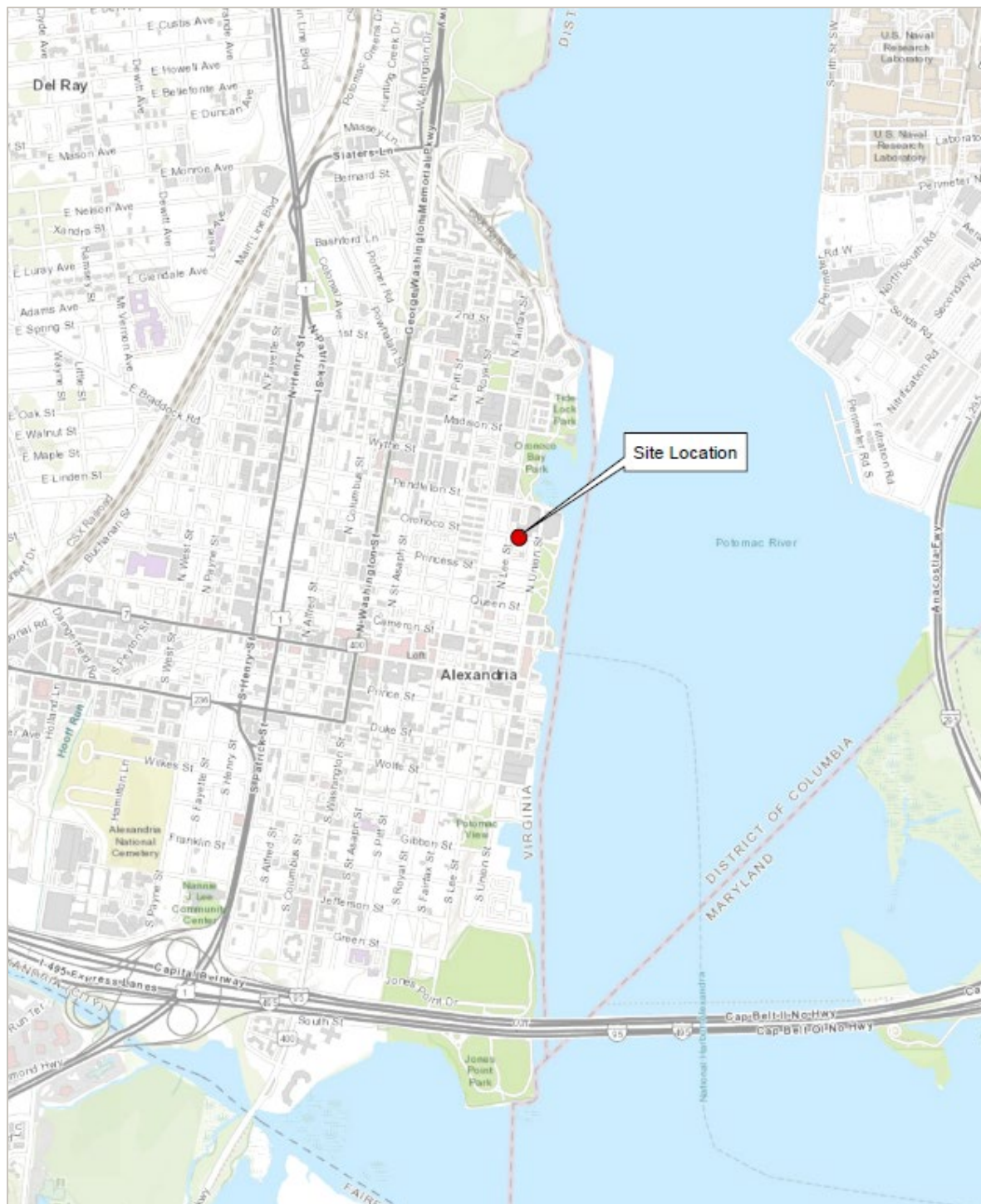
## 1.1 Site Background

The ATG-Oronoco Voluntary Remediation Program (VRP) Site occupies an approximately 1-acre group of privately owned parcels at the corner of Oronoco and North Lee Streets in Old Town Alexandria (see **Figure 1**). The City operated the ATG MGP near the corner of North Lee and Oronoco Streets between 1851 and 1946. After closing, most of the ATG plant was demolished and the remaining buildings were repurposed by various businesses until the mid-1970s. In 1977, the former MGP property, including the last two remaining MGP buildings, was redeveloped into the Lee Street Square commercial/office townhouse complex (LSS), which now occupies the Site. In 1975, just prior to the redevelopment of the former MGP Site, a 44-inch x 72-inch-diameter arch-style stormwater pipeline was installed beneath the centerline of Oronoco Street adjacent to the former MGP Site to improve drainage and flood control in the area.

The surrounding urban area is occupied by a mixture of commercial and residential properties bordering the west bank of the Potomac River. The VRP Site boundaries also encompass the bordering City-owned public rights-of-way along Oronoco Street, from the intersection of North Lee Street to the end of Oronoco Street. However, in some cases, Site-related impacts extend beyond these boundaries to areas beneath adjoining private property and public rights-of-way, including the river bottom at the Oronoco Outfall.

**Figure 2** presents a full site layout, including the VRP Site boundary and remedial activities and systems that have been installed prior to the Consent Decree.

## ATG-Oronoco Site Summary January 1, 2025 to June 30, 2025



### Figure 1 - Site Location

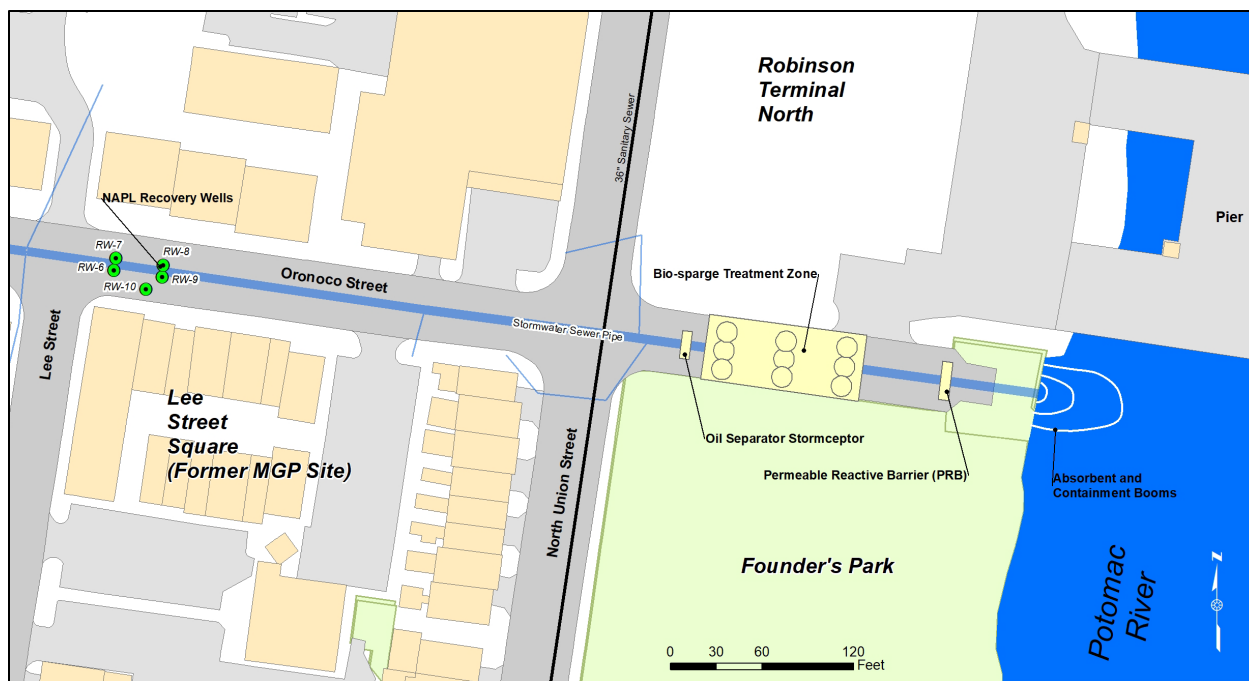


Figure 2 - Site Layout with Remedial Systems

## 1.2 Scope of Work

The City of Alexandria Office of Environmental Quality (OEQ) oversees ongoing remedial operations at the Site. The operations focus on reducing contaminant mass at the source area and reducing or eliminating off-site discharges through the stormwater outfall located at the foot of Oronoco Street.

The remedial activities discussed in this report include:

1. Implementation of an Upland Remediation Program, to include:
  - a. Completion of an in-well heating study on two existing recovery wells
  - b. Completion of a non-aqueous phase liquid (NAPL) mapping subsurface exploration program using the Tar-Specific Green Optical Scanning Tool (TarGOST) technology
  - c. Using the TarGOST data, installation of additional NAPL recovery wells in the source area
  - d. Completion of a recovery frequency study following the installation of new wells
  - e. Summary of NAPL recovery from existing wells and new wells installed following the TarGOST survey
2. Implementation of a Pipe Integrity and Inspection Program, to include:
  - a. Cured-In-Place Pipe (CIPP) rehabilitation of the existing storm sewer on Oronoco Street
  - b. Pipe inspections and repairs (if required)
  - c. Ongoing outfall inspection and boom maintenance program

## **ATG-Oronoco Site Summary January 1, 2025 to June 30, 2025**

- d. Ongoing water quality sampling to test for constituents of concern
- 3. Implementation of a Pier Removal and Sediment Remediation Program, to include:
  - a. Removal of the Robinson Terminal North (RTN) pier
  - b. Sediment sampling for total Polycyclic Aromatic Hydrocarbons (PAHs) in the vicinity of the RTN pier
  - c. Remediation of sediment underneath the RTN pier, if warranted

The following sections summarize activities pursuant to the above outlined scope completed during the first half of 2025 (January 1 through June 30), starting from the effective date of the Consent Decree, as well as preparatory actions taken prior to this period.

## 2 Upland Area Remediation Program Summary

The upland remediation program's goal is to recover legacy contaminants from the former MGP, commonly referred to as “free product” or NAPL, in the subsurface so that it does not reach the storm sewer pipe that discharges to the Potomac River. Prior to the Consent Decree and as part of the VRP, the City installed recovery wells to collect and remove free product from the subsurface. The Consent Decree requires the City to continue its efforts to recover free product in the upland area.

### 2.1 Recovery Well Installation

Five new recovery wells (designated RW-11, RW-12, RW-13, RW-14, and RW-15) were installed the weeks of August 19<sup>th</sup> and 26<sup>th</sup>, 2024. Each of the new wells is four inches in diameter with five-foot long stainless steel screens and a five-foot sump located below the screened interval. Each well is screened from about 17 feet to 22 feet below ground surface, corresponding to the depth zone of highest NAPL saturation.

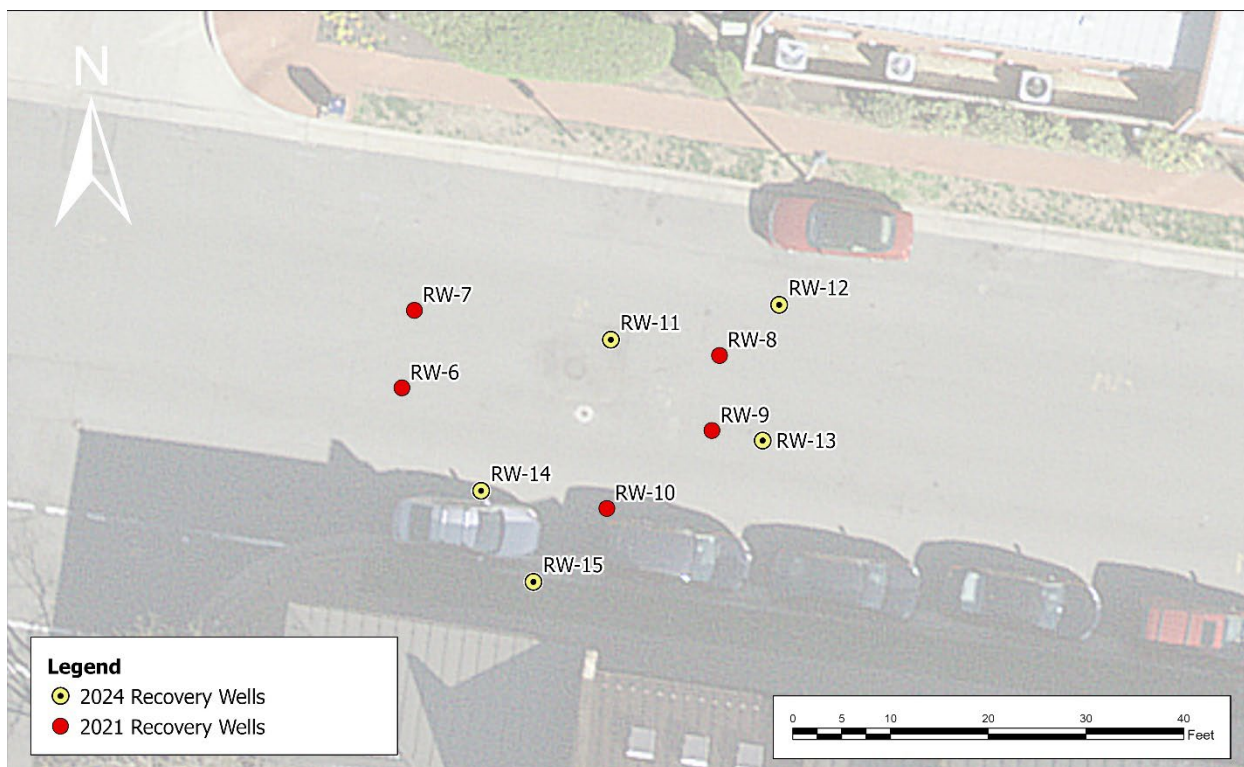


Figure 3 - Locations of New NAPL Recovery Wells



## 2.2 Recovery Frequency Study

The City started a NAPL recovery frequency study in December 2024 and completed the study in February 2025. The results were reported separately in the ATG-Oronoco Site Free Product Recovery Optimization Report, completed by Stantec Consulting Services, Inc, and submitted to PRKN on April 4, 2025, and are summarized here. The study's purpose was to better understand dense non-aqueous phase liquid (DNAPL) infiltration rates and responses to recovery so that short-term recovery rates can be optimized without compromising long-term recovery. The study consisted of a period of Free Product Recovery (FPR) collection from the recovery well network, followed by analyses of the FPR data to optimize FPR collection scheduling.

Free product recovery frequency is based on storage capacity of the well sump and the estimated accumulation rate of DNAPL into the well. DNAPL is expected to continue to flow into the recovery wells and accumulate in the sump until the height of DNAPL reaches equilibrium with the elevation of the saturated DNAPL in the surrounding soils in the screened interval. Inflow of DNAPL to the well should continue as long as the stored column height of DNAPL is maintained below the bottom of the screened interval. During recovery events DNAPL is pumped from the storage sump. Collection rates that exceed the rate of DNAPL inflow to the well will result in declining DNAPL column heights, while collection rates that are below the DNAPL inflow rate will result in increasing DNAPL column heights. More frequent collection would be inefficient since additional time would have allowed additional free product to accumulate in the sumps. Conversely, a less frequent collection time would be inefficient because waiting until the collection sumps are full would slow recharge rates and reduce the amount of free product that could have been collected. Therefore, optimization of the FPR collection data focuses on the recharge rates for DNAPL entering the wells and filling the 5-foot-long collection sumps located beneath the well screens.

Data indicating the numbers of days to maximum recharge volume are the primary basis for an optimized FPR collection schedule. Given the current trend in recharge days, the data suggested that the number of days between collection events should not extend past 30 days, or one month. Further, given the underlying uncertainties with long-term free product collection and recharge rates, FPR collection should be performed at least once every two weeks. More frequent collection, however, is not indicated by the data.

Based on these findings, the optimization study concluded that an optimal FPR collection schedule would consist of collection events occurring once approximately every two weeks, with no time period of greater than 1 month being allowed between collection events. This schedule should allow for operational flexibility for mobilizing collection field crews while staying within the currently predicted maximum days to recharge storage in the recovery well collection sumps.

## 2.3 NAPL Recovery

Free product was gauged and/or collected from recovery wells RW-11 through RW-15 on an accelerated schedule during January and February 2025 as part of the NAPL recovery optimization study, then collected on a bi-weekly basis during the remainder of the first half of 2025. **Table 1** below summarizes

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recovery activity from the recovery wells. The total recovered free product per event significantly decreased in April as product levels declined in the recovery wells and has remained low throughout the remainder of the first half of 2025. The total amount of recoverable NAPL fell below 10 gallons in May, which is the threshold specified in the Consent Decree for scheduling a supplemental TarGOST survey. A total of 79 gallons of NAPL was recovered during the first half of 2025. Records of free product recovery activities are attached in the maintenance logs presented in **Appendix 1**.

Subsequent to the reporting period summarized in this report, the City notified PRKN that Manhole 92 would be replaced in late 2025. Significant recovery of NAPL may be possible during the manhole replacement project, and the amount of NAPL removed will be documented and estimated. This NAPL-removal activity may significantly alter the subsurface conditions within the saturated zone of coal tar. Because the purpose of a TarGOST survey is to map the subsurface depth and thickness of NAPL to determine appropriate locations for recovery wells, the City proposed to defer the supplemental TarGOST survey until after Manhole 92 is replaced. Through its counsel, PRKN concurred with the proposal on August 5. The TarGOST survey will be completed within 60 days of the manhole replacement project.

**Table 1 - Summary of Free Product Recovery – First Half 2025**

Date	Product recovered from RW-6 (gallons)	Product recovered from RW-9 (gallons)	Product recovered from RW-11 (gallons)	Product recovered from RW-12 (gallons)	Product recovered from RW-13 (gallons)	Product recovered from RW-14 (gallons)	Product recovered from RW-15 (gallons)	Product recovered By Event (gallons)
1/2/2025	0	0	0	3.5	2.0	0	2.5	8.0
1/10/2024	0	0	0	2.5	2.0	0	2.0	6.5
1/14/2025	0	0	0	2.5	2.0	0	1.5	6.0
1/16/2025	0	0	0	2.0	1.5	0	2.0	5.5
1/21/2025	0	0	0	3.0	2.0	0	2.5	7.5
1/23/2025	0	0	0	2.0	1.0	0	2.5	5.5
1/30/2025	0	0	0	1.0	1.5	0	1.5	4.0
2/7/2025	0	1.0	0	1.0	1.5	0	1.5	5.0
2/20/2025	0	0	0	1.5	2.5	0	1.0	5.0
3/6/2025	0	0	0	1.5	2.5	0	1.5	5.5
3/19/2025	1.0	0	0	1.5	1.0	0	1.5	5.0
4/8/2025	0	0	0	2.0	3.0	0	0	5.0
4/24/2025	2.5	0	0	1.0	1.5	0	0	5.0
5/9/2025	0	0	0	0	0	0	0	0
5/22/2025	0	0	0	0	0	0	0	0
6/4/2025	0	1.0	0	0	1.0	0	1.5	3.5
6/16/2025	0	0	0	0	0	0	0	0
6/30/2025	0	1.0	0	0	0	0	1.0	2.0
<b>Totals</b>	<b>3.5</b>	<b>3.0</b>	<b>0</b>	<b>25.0</b>	<b>25.0</b>	<b>0</b>	<b>22.5</b>	<b>79.0</b>

### 3 Pipe Integrity and Inspection Program Summary

The pipe program is designed to rehabilitate the Oronoco Street storm sewer to prevent the intrusion of pollutants from the Site into the pipe. The Consent Decree specifies that the pipe be rehabilitated using the cured-in-place pipe (CIPP) liner process and that the liner be installed by March 31, 2025. Following the installation of the CIPP liner, the City is required to do annual pipe inspections to ensure that CIPP liner is intact without defects that would allow intrusion of free or dissolved product into the pipe.

The Consent Decree also requires the City to implement an outfall monitoring and maintenance program, similar to the program the City follows under the VRP. The requirements include weekly or biweekly in-person inspections at the outfall, continuously available electronic monitoring of the outfall, and maintaining the existing containment system at the outfall. Finally, the Consent Decree requires routine water quality testing of the storm sewer and outfall following completion of the pipe rehabilitation.

### **3.1 Cured-in-Place Pipe Relining**

As stated previously, the City completed the installation of 420 linear feet of CIPP for the storm sewer starting from Manhole 92A (more than 50 feet upstream of Manhole 92) and ending at Manhole 93. The CIPP installation was completed on November 11, 2024. Beginning on February 14, 2025, multiple sheens were observed at the outfall. A remote-controlled closed-circuit television (CCTV) inspection performed on February 21, 2025, confirmed lining failure and coal tar leakage at Manhole 92. The liner is intact and in good condition both upstream and downstream of Manhole 92.

The City's Contractor took responsibility for the failure and developed a repair plan in coordination with the City. The repair at Manhole 92 was completed on April 23, 2025, and included injection of grout at the points of intrusion, followed by spray-on rehabilitation of the entire manhole structure. Shortly thereafter sheens were again observed at the outfall. The Contractor performed another CCTV inspection and observed active NAPL infiltration coming into the manhole. On July 8, 2025, the Contractor completed additional repairs to minimize NAPL intrusion until a reliable, long-term solution can be implemented. The City is currently working with its engineering Consultant to finalize plans for the removal and replacement of entire 1975 manhole structure from the road surface to the storm sewer channel. As noted above, the City will use the replacement project as an opportunity to remove free-phase coal tar in the vicinity of the manhole. If feasible, other measures may be incorporated into the project design to aid remediation of the Site. The City anticipates completion of the Manhole 92 replacement project by the end of 2025.

### **3.2 Pipe Inspections**

As part of the Consent Decree, the City must conduct annual inspections of the storm sewer pipe along Oronoco Street from the outfall to at least 25 feet upstream of the planned CIPP lining. Annual inspections must be conducted once per calendar year and may not be conducted less than 10 months apart or more than 14 months apart. The inspections must include the pipe, manholes, and lateral connections and be performed by a licensed/certified professional. Separate from the annual inspections, inspections are also required if there is evidence of a potential new source of NAPL intrusion into the pipe.

Additional details about the City's monitoring and corrective actions are provided in Section 3.3, below.

### **3.3 Outfall Monitoring and Maintenance**

The Consent Decree requires both in-person and electronic monitoring of the outfall. In-person monitoring is conducted weekly for visible sheens and to identify any needed maintenance for the containment system. Pictures are taken and notes are made as to observations and any work performed. Copies of these inspection reports are provided in Appendix 1. The Consent Decree allows for a reduction in outfall monitoring from weekly to every two weeks if no sheens are observed for 12 consecutive weeks, or when the City completes installation of a webcam pursuant to Paragraph 6 of Appendix B of the Consent Decree, whichever is earlier. The City currently monitors the outfall on a weekly basis and will notify PRKN of any plan to move from weekly to biweekly inspections.

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The City also installed a webcam that allows for electronic monitoring at the outfall site. The camera was installed and the link to the live feed was provided to PRKN on April 5, 2024, within 90 days of the Consent Decree effective date. City staff typically check the camera on weekdays and when incidences of sheens are recorded. Notification of sheens is provided to PRKN within 10 days of observance.

The City is required to install a containment system at the outfall and implement a maintenance program. Sweeps installed within the pipe are intended to absorb NAPL traveling toward the outfall. Floating containment booms installed around the outfall are intended to capture any NAPL that may escape the pipe. The booms are required to be repaired/replaced within 30 to 90 days of damage to the booms, depending on the type of damage. The City's Contractor provides maintenance, including boom repairs and replacement of absorbents and in-pipe sweeps, as needed. A log of maintenance activities is appended to this report as **Appendix 1. Table 3** below summarizes in-person inspection and maintenance activities.

Sheens were not observed during January 2025. Beginning in February 2025, small sheens were observed at the outfall and began increasing in size with time. As described earlier in Section 3.1 of this report, a CCTV inspection performed on February 21, 2025, confirmed lining failure and coal tar leakage at Manhole 92. A repair at Manhole 92 was completed on April 23, 2025. Shortly thereafter sheens were again observed at the outfall. The lining contractor performed CCTV and observed active infiltration coming into Manhole 92. The contractor completed an additional grouting repair in July 2025 to minimize further intrusion until the manhole replacement is complete. While outside the reporting period for this summary report, the City notes that sheen occurrence has mostly abated since the most recent repair.

**ATG-Oronoco Site Summary January 1, 2025 to June 30, 2025**

**Table 2 - Summary of Outfall Inspection/Maintenance - First Half of 2025**

<b>Date</b>	<b>Inspect</b>	<b>Repair/Replace</b>	<b>Comments</b>
1/2/2025	X		No sheen
1/8/2025	X	X	Absorbent booms replaced, no sheen
1/16/2025	X		No sheen
1/23/2025	X		No sheen
1/30/2025	X		No sheen
2/7/2025	X		Slight small sheen at mouth of pipe, within closest boom
2/14/2025	X		Spotty sheen observed at mouth of pipe, within closest boom
2/20/2025	X		Small to moderate sheen observed at mouth of pipe
2/27/2025	X	X	Small to moderate sheen observed at mouth of pipe, all booms replaced, additional booms placed at pipe mouth, absorbent sweep installed at MH93
3/6/2025	X		No sheen
3/11/2025	X	X	Moderate sheen observed at outfall between innermost and middle boom, sweep replaced in MH93
3/19/2025	X		Heavy sheen to outermost boom but fully contained
3/25/2025	X	X	Heavy sheen to outermost boom but fully contained, outer boom reconnected
4/1/2025	X		Slight sheen, contained within booms
4/8/2025	X		Moderate sheen, contained within booms
4/17/2025	X	X	Moderate sheen, replaced all booms and sweep in MH-93
4/24/2025	X		Slight sheen, contained within booms
4/29/2025	X		No sheen
5/9/2025	X		Spotty sheen, contained within booms
5/12/2025	X	X	Moderate spotty sheen, replaced all booms

Date	Inspect	Repair/Replace	Comments
5/22/2025	X		Moderate spotty sheen, contained within booms
5/30/2025	X		Moderate spotty sheen, contained within booms
6/4/2025	X		Moderate sheen, contained within booms
6/12/2025	X		No sheen
6/16/2025	X	X	Slight sheen, replaced all booms
6/23/2025	X		Moderate sheen, contained within booms
6/30/2025	X		Spotty sheen, contained within booms

### 3.4 Water Quality Testing

The City is required to conduct quarterly sampling at Manhole 93 and at the outfall for the following constituents: naphthalene, benzene and total petroleum hydrocarbons within detection limits low enough to detect exceedances as stated in the Consent Decree. Field parameters including temperature, pH and total dissolved solids will also be collected and a description of each sample recorded, noting any NAPL sheen. The City completed sampling of the stormwater on March 25 and June 23, 2025. Both sampling events have been reported to PKRN under separate cover on April 29, 2025, and July 21, 2025.

#### 3.4.1 March 25, 2025 Sampling

The City collected grab samples directly from flowing water in the pipe from Manhole 93 (near the intersection of Lee Street and Union Street) and from the pipe mouth at the outfall at the Potomac River (sampling locations are shown below). Sampling was completed during low tide conditions during fair weather. Samples were kept on ice under chain-of-custody protocol and transported to Enthalpy Laboratories in Richmond, Virginia for analysis of benzene and naphthalene by EPA Test Method 8260, Total Petroleum Hydrocarbons – Diesel Range Organics (TPH-DRO) by EPA Method 8015M, and Total Dissolved Solids by Method SM2540C-2020. pH and temperature were recorded in the field at the time of collection. A sheen was observed at the outfall at the time of sample collection and petroleum-like odors were also observed. The following table summarizes the analytical results.

**Table 3 - Summary of March Stormwater Sampling Results**

Analyte/Parameter	Consent Order Limits	Sample Location		
		MH-93	Outfall	Trip Blank
Benzene (µg/L)	5.8 ug/L	85.9	52.9	BLOD
Naphthalene (µg/L)	8.9 ug/L	191	145	BLOD
Total Dissolved Solids (mg/L)	NA	454	432	
TPH-Diesel Range Organics (DRO) (mg/L)	15 mg/L	0.741	0.992	
pH	NA	7.88	7.88	
Temperature (° C)	NA	17.7	17.5	

BLOD – Below Limit of Detection

NA – Not Applicable

### 3.4.2 June 23, 2025 Sampling

The City collected grab samples directly from flowing water in the pipe from Manhole 93 (near the intersection of Lee Street and Union Street) and from the pipe mouth at the outfall at the Potomac River (sampling locations are shown below). Sampling was completed during low tide conditions during fair weather. Samples were kept on ice under chain-of-custody protocol and transported to Enthalpy Laboratories in Richmond, Virginia for analysis of benzene and naphthalene by EPA Test Method 8260, Total Petroleum Hydrocarbons – Diesel Range Organics (TPH-DRO) by EPA Method 8015M, and Total Dissolved Solids by Method SM2540C-2020. pH and temperature were recorded in the field at the time of collection. A spotty, discontinuous sheen was observed at the outfall at the time of sampling. The following table summarizes the analytical results.



**Table 4 - Summary of June Stormwater Sampling Results**

Analyte/Parameter	Consent Order Limits	Sample Location		
		MH-93	Outfall	Trip Blank
Benzene (µg/L)	5.8 ug/L	8.14	5.12	BLOD
Naphthalene (µg/L)	8.9 ug/L	25.1	15.3	BLOD
Total Dissolved Solids (mg/L)	NA	445	456	
TPH-Diesel Range Organics (DRO) (mg/L)	15 mg/L	0.544	0.532	
pH	NA	6.93	6.85	
Temperature (° C)	NA	28.7	27.8	

BLOD – Below Limit of Detection

NA – Not Applicable

## 4 Robinson Terminal North Pier Removal and Sediment Remediation Program Summary

The goal of the pier removal and sediment remediation program is to quantify and remediate, if warranted, contaminated Potomac River sediments. To achieve these goals, a series of steps need to take place including (and in order): removal and/or stabilization of the Robinson Terminal North (RTN) pier by RTN East LLC; development of a sediment sampling plan; application of and receipt of necessary permits; completion of sediment sampling in accordance with the sampling plan; and development of a sediment sampling report and sediment remediation plan, and implementation of the sediment remediation plan. While the Consent Decree includes dates and milestones for achieving the relevant goals, these dates and timelines may need to be adjusted depending on factors outside the City's control, primarily the work to be done by others and approvals from outside third parties.

## 4.1 Pier Removal

The Consent Decree requires the City to ensure that the privately owned RTN pier is removed and/or stabilized so that the area around and under the pier is ready for sampling by September 25, 2025. This requirement is consistent with the City's preexisting actions to ensure the owner, RTN East LLC, implements appropriate measures to secure the hazardous pier structure. As of the end of the reporting period for this report, a small portion of the site was occupied by AlexRenew as part of the RiverRenew combined sewer tunnel construction but their occupancy is located at the Pendleton Street combined sewer outfall and does not impact access to the pier. The City has executed an agreement with the RTN pier owner that obligates the owner to commence the pier removal/stabilization project as soon as practicable after February 28, 2025. Along with removing/stabilizing the pier, the owner is also required to remove the debris accumulated under the pier within 30 days of the completion of the removal/stabilization. The owner of the RTN pier has a contractor who commenced pier demolition activities in June 2025. The RTN pier owner has informed the City that the pier demolition and debris removal is currently scheduled for completion by mid-October, which is two weeks later than the date memorialized in the Consent Decree. The City has notified the RTN pier owner of the need take all reasonable and appropriate actions to avoid or minimize this delay.

## 4.2 Sediment Sampling

Upon gaining safe access to the area around and under the RTN pier, the City will collect sediment samples at approximately 68 locations as shown on Figure 1 of the Consent Decree. The sediment samples will be analyzed for total polycyclic aromatic hydrocarbons (PAHs) as defined by the Wisconsin Department of Natural Resources Guidance with the sum of the 18 PAHs normalized to 1% total organic carbon.

In accordance with the VRP program, the City submitted a sediment sampling work plan to the Virginia Department of Environmental Quality (DEQ) for approval on February 19, 2025. Minor comments were received from VDEQ on March 5, 2025. The final Work Plan was prepared and is dated March 2025. By the March 28, 2025, date specified in the Consent Decree, the City requested approval to perform the sediment sampling from the United States Army Corps of Engineers (USACE) and DEQ. Approval was received by the USACE and DEQ, and the City subsequently submitted a permit application to the National Park Service (NPS). The City is in communication with the NPS regarding its permit application. The sediment sampling will be completed as soon as practicable, but no later than 45 days after removal/stabilization of the pier or from the date the City receives all necessary permits/approvals to conduct the sampling, whichever is later.

Once the sampling is completed, the City will prepare a report with the sampling data. The report shall be submitted to PRKN within 30 days of the receipt of the sampling data by the City.

## **4.3 Sediment Remediation**

If the sediment sampling discussed above reveals probable effect concentrations exceeding 22.8 mg/kg total PAHs as defined in the Wisconsin Department of Natural Resources guidance, then the City will prepare a sediment remediation plan. The plan will include an analysis of and selection among various remedial alternatives, including a dredging and capping alternative. The plan would be provided to PRKN and to VDEQ within 60 days of finalization of the sampling report. Once VDEQ approves the plan, the City would submit applications for permits within 45 days of approval. In terms of schedule, the City must initiate any remediation actions required by the finalized plan by July 1, 2026. A completion report must be submitted within 90 days of completion of any remedial action(s).

## **Appendices**

### **Appendix 1 Operations and Maintenance Logs**

## **ATG-Oronoco Site O&M Record**

### **Date:**

January 10, 2025 10:01 AM

### **Personnel:**

Shelby Dyer, RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

None

January 10, 2025 10:01 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



January 10, 2025 10:01 AM

**System O&M Data**

**Bldg Temp:**

**Comp Hours:**

**Coolant:**

**Pressures and Flows**

**BSW-1 Flow**

**BSW-4 Flow**

**BSW-7 Flow**

**BSW-1 Press**

**BSW-4 Press**

**BSW-7 Press**

**BSW-2 Flow**

**BSW-5 Flow**

**BSW-8 Flow**

**BSW-2 Press**

**BSW-5 Press**

**BSW-8 Press**

**BSW-3 Flow**

**BSW-6 Flow**

**BSW-9 Flow**

**BSW-3 Press**

**BSW-6 Press**

**BSW-9 Press**

**System Notes:**

System still down.

## **ATG-Oronoco Site O&M Record**

### **Date:**

January 14, 2025 10:25 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

None



January 14, 2025 10:25 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



January 14, 2025 10:25 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down

## **ATG-Oronoco Site O&M Record**

### **Date:**

January 16, 2025 10:22 AM

### **Personnel:**

Shelby Dyer, RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

Outfall partly frozen.

January 16, 2025 10:22 AM

**Outfall Photo #1:**



**Outfall Photo #2:**



**Outfall Photo #3:**



**Outfall Photo #4:**



January 16, 2025 10:22 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down.

## **ATG-Oronoco Site O&M Record**

### **Date:**

January 21, 2025 10:06 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

None

January 21, 2025 10:06 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



January 21, 2025 10:06 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down.



## **ATG-Oronoco Site O&M Record**

### **Date:**

January 23, 2025 10:12 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

None

January 23, 2025 10:12 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



January 23, 2025 10:12 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down.

## **ATG-Oronoco Site O&M Record**

### **Date:**

January 30, 2025 10:19 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

None.

January 30, 2025 10:19 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



January 30, 2025 10:19 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down

## **ATG-Oronoco Site O&M Record**

### **Date:**

February 7, 2025 9:21 AM

### **Personnel:**

Shelby Dyer, Dane Anderson

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

SLIGHT sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Sheen spotted near first layer of boom next to mouth of outfall.



February 7, 2025 9:21 AM

**Outfall Photo #1:**



**Outfall Photo #2:**



**Outfall Photo #3:**



**Outfall Photo #4:**





February 7, 2025 9:21 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

System still down.

## **ATG-Oronoco Site O&M Record**

### **Date:**

February 20, 2025 10:14 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

MODERATE sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Sheen spotted around inner boom area.

February 20, 2025 10:14 AM

**Outfall Photo #1:**



**Outfall Photo #2:**



**Outfall Photo #3:**



**Outfall Photo #4:**



February 20, 2025 10:14 AM

## System O&M Data

**Bldg Temp:**

80

**Comp Hours:**

32,573.8

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

7.5

**BSW-2 Flow**

0

**BSW-2 Press**

8

**BSW-3 Flow**

0

**BSW-3 Press**

8.5

**BSW-4 Flow**

0

**BSW-4 Press**

8

**BSW-5 Flow**

0

**BSW-5 Press**

8.5

**BSW-6 Flow**

0

**BSW-6 Press**

10

**BSW-7 Flow**

0

**BSW-7 Press**

8.5

**BSW-8 Flow**

0

**BSW-8 Press**

8.5

**BSW-9 Flow**

0

**BSW-9 Press**

5.5

## System Notes:

System running normally.

## **ATG-Oronoco Site O&M Record**

### **Date:**

March 11, 2025 9:44 AM

### **Personnel:**

Shelby Dyer

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

HEAVY sheen

### **Outfall Odors:**

STRONG odor

### **Additional Outfall Notes:**

Heavy sheen thought outfall.



March 11, 2025 9:44 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



March 11, 2025 9:44 AM

System O&M Data

Bldg Temp:

73

Comp Hours:

32,759.9

Coolant:

Coolant Added

Pressures and Flows

BSW-1 Flow

0

BSW-1 Press

7.5

BSW-2 Flow

0

BSW-2 Press

1

BSW-3 Flow

0

BSW-3 Press

1.5

BSW-4 Flow

0

BSW-4 Press

1.5

BSW-5 Flow

0

BSW-5 Press

1.5

BSW-6 Flow

0

BSW-6 Press

0

BSW-7 Flow

0

BSW-7 Press

0

BSW-8 Flow

0

BSW-8 Press

0

BSW-9 Flow

0

BSW-9 Press

5.5

System Notes:

System running normally.



## **ATG-Oronoco Site O&M Record**

### **Date:**

March 19, 2025 9:42 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

HEAVY sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Sheen spreading inside entire outfall but contained.

March 19, 2025 9:42 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



March 19, 2025 9:42 AM

System O&M Data

Bldg Temp:

74

Comp Hours:

32,842

Coolant:

Coolant Added

Pressures and Flows

BSW-1 Flow

0

BSW-1 Press

7.5

BSW-2 Flow

0

BSW-2 Press

1

BSW-3 Flow

0

BSW-3 Press

1.5

BSW-4 Flow

0

BSW-4 Press

1.5

BSW-5 Flow

0

BSW-5 Press

1.5

BSW-6 Flow

0

BSW-6 Press

0

BSW-7 Flow

0

BSW-7 Press

0

BSW-8 Flow

0

BSW-8 Press

0

BSW-9 Flow

0

BSW-9 Press

5.5

System Notes:

System running normally.

## **ATG-Oronoco Site O&M Record**

### **Date:**

April 1, 2025 9:41 AM

### **Personnel:**

Shelby Dyer

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

SLIGHT sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

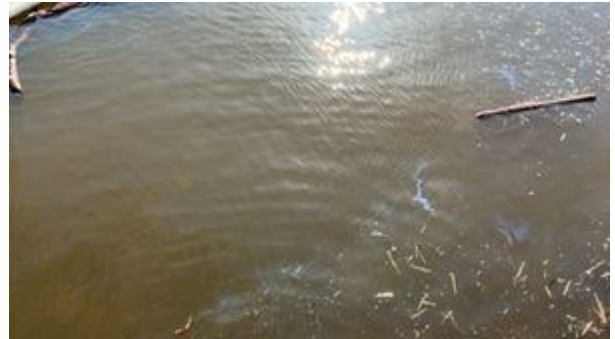
None

April 1, 2025 9:41 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



April 1, 2025 9:41 AM

## System O&M Data

**Bldg Temp:**

70

**Comp Hours:**

32,996.9

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

8

**BSW-2 Flow**

0

**BSW-2 Press**

1

**BSW-3 Flow**

0

**BSW-3 Press**

1

**BSW-4 Flow**

0

**BSW-4 Press**

1.5

**BSW-5 Flow**

0

**BSW-5 Press**

2

**BSW-6 Flow**

0

**BSW-6 Press**

0

**BSW-7 Flow**

0

**BSW-7 Press**

0

**BSW-8 Flow**

0

**BSW-8 Press**

0

**BSW-9 Flow**

0

**BSW-9 Press**

5.5

System running normally.  
Site observation. Also  
checked sweep at MH-93

and did not change for  
now.

**System Notes:**

## **ATG-Oronoco Site O&M Record**

### **Date:**

April 8, 2025 9:17 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

MODERATE sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Soft inner and half of outer boom is about spent. Will need to change soon.

April 8, 2025 9:17 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**





April 8, 2025 9:17 AM

## System O&M Data

### Bldg Temp:

69

### Comp Hours:

33,074.6

### Coolant:

Coolant Added

## Pressures and Flows

### BSW-1 Flow

0

### BSW-1 Press

8

### BSW-2 Flow

0

### BSW-2 Press

1.5

### BSW-3 Flow

0

### BSW-3 Press

1.5

### BSW-4 Flow

0

### BSW-4 Press

1.5

### BSW-5 Flow

0

### BSW-5 Press

2

### BSW-6 Flow

0

### BSW-6 Press

0

### BSW-7 Flow

0

### BSW-7 Press

0

### BSW-8 Flow

0

### BSW-8 Press

0

### BSW-9 Flow

0

### BSW-9 Press

5.5

## System Notes:

System running normally.

## **ATG-Oronoco Site O&M Record**

### **Date:**

April 17, 2025 9:21 AM

### **Personnel:**

Shelby Dyer, RP Meredith, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

MODERATE sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Will do boom replacement today(4-17-25) and site observation.

April 17, 2025 9:21 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



April 17, 2025 9:21 AM

## System O&M Data

**Bldg Temp:**

70

**Comp Hours:**

33,196.8

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

7.5

**BSW-2 Flow**

0

**BSW-2 Press**

1

**BSW-3 Flow**

0

**BSW-3 Press**

1.5

**BSW-4 Flow**

0

**BSW-4 Press**

1.5

**BSW-5 Flow**

0

**BSW-5 Press**

1.5

**BSW-6 Flow**

0

**BSW-6 Press**

0

**BSW-7 Flow**

0

**BSW-7 Press**

0

**BSW-8 Flow**

0

**BSW-8 Press**

0

**BSW-9 Flow**

0

**BSW-9 Press**

5.5

## System Notes:

System running normally.

## **ATG-Oronoco Site O&M Record**

### **Date:**

April 24, 2025 9:16 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

SLIGHT sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

Some of the sheen is gathered nearest the pier.

April 24, 2025 9:16 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



April 24, 2025 9:16 AM

System O&M Data

Bldg Temp:

80

Comp Hours:

33,311.9

Coolant:

OK

Pressures and Flows

BSW-1 Flow

0

BSW-1 Press

7.5

BSW-2 Flow

0

BSW-2 Press

0

BSW-3 Flow

0

BSW-3 Press

0

BSW-4 Flow

0

BSW-4 Press

1.5

BSW-5 Flow

0

BSW-5 Press

1.5

BSW-6 Flow

0

BSW-6 Press

0

BSW-7 Flow

0

BSW-7 Press

0

BSW-8 Flow

0

BSW-8 Press

0

BSW-9 Flow

0

BSW-9 Press

5

System Notes:

System running normal

## **ATG-Oronoco Site O&M Record**

### **Date:**

April 29, 2025 9:35 AM

### **Personnel:**

Shelby Dyer

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

Site observation.



April 29, 2025 9:35 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



April 29, 2025 9:35 AM

System O&M Data

Bldg Temp:

80

Comp Hours:

33,380.4

Coolant:

OK

Pressures and Flows

BSW-1 Flow

0

BSW-1 Press

7.5

BSW-2 Flow

0

BSW-2 Press

0

BSW-3 Flow

0

BSW-3 Press

0

BSW-4 Flow

0

BSW-4 Press

1.5

BSW-5 Flow

0

BSW-5 Press

1.5

BSW-6 Flow

0

BSW-6 Press

0

BSW-7 Flow

0

BSW-7 Press

0

BSW-8 Flow

0

BSW-8 Press

0

BSW-9 Flow

0

BSW-9 Press

5

System Notes:

System running normal

## **ATG-Oronoco Site O&M Record**

### **Date:**

May 9, 2025 9:28 AM

### **Personnel:**

Shelby Dyer, RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

SPOTTY sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

Spotty sheen located between outer soft and hard boom nearest pier

May 9, 2025 9:28 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



May 9, 2025 9:28 AM

## System O&M Data

### Bldg Temp:

66

### Comp Hours:

33,440.5

### Coolant:

Coolant Added

## Pressures and Flows

### BSW-1 Flow

0

### BSW-1 Press

7.5

### BSW-2 Flow

0

### BSW-2 Press

8

### BSW-3 Flow

0

### BSW-3 Press

8

### BSW-4 Flow

0

### BSW-4 Press

8

### BSW-5 Flow

0

### BSW-5 Press

8.5

### BSW-6 Flow

0

### BSW-6 Press

11.5

### BSW-7 Flow

0

### BSW-7 Press

14

### BSW-8 Flow

0

### BSW-8 Press

14.5

### BSW-9 Flow

0

### BSW-9 Press

5

## System Notes:

Restarted system.

## **ATG-Oronoco Site O&M Record**

### **Date:**

May 12, 2025 9:26 AM

### **Personnel:**

Shelby Dyer, RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

MODERATE sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Inner and outer boom will be replaced today(5-12-25). Site observation and boom replacement. Replaced 320 ft of soft boom 5"x10' and used 5 drums in all. 4 are full and the fifth drum is half full of soft boom and sixth drum of used sweep and spill pads.

May 12, 2025 9:26 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



May 12, 2025 9:26 AM

## System O&M Data

**Bldg Temp:**

76

**Comp Hours:**

33,475.8

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

7.5

**BSW-2 Flow**

0

**BSW-2 Press**

0

**BSW-3 Flow**

0

**BSW-3 Press**

0

**BSW-4 Flow**

0

**BSW-4 Press**

1.5

**BSW-5 Flow**

0

**BSW-5 Press**

1.5

**BSW-6 Flow**

0

**BSW-6 Press**

0

**BSW-7 Flow**

0

**BSW-7 Press**

0

**BSW-8 Flow**

0

**BSW-8 Press**

1.5

**BSW-9 Flow**

0

**BSW-9 Press**

5

## System Notes:

System running normal.



## **ATG-Oronoco Site O&M Record**

### **Date:**

May 22, 2025 10:34 AM

### **Personnel:**

RP Meredith, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

May 22, 2025 10:34 AM

**Outfall Photo #1:**



**Outfall Photo #2:**



**Outfall Photo #3:**



**Outfall Photo #4:**



May 22, 2025 10:34 AM

System O&M Data

Bldg Temp:

Comp Hours:

Coolant:

Pressures and Flows

BSW-1 Flow

BSW-4 Flow

BSW-7 Flow

BSW-1 Press

BSW-4 Press

BSW-7 Press

BSW-2 Flow

BSW-5 Flow

BSW-8 Flow

BSW-2 Press

BSW-5 Press

BSW-8 Press

BSW-3 Flow

BSW-6 Flow

BSW-9 Flow

BSW-3 Press

BSW-6 Press

BSW-9 Press

System Notes:

## **ATG-Oronoco Site O&M Record**

### **Date:**

June 4, 2025 9:19 AM

### **Personnel:**

Shelby Dyer, Damian Murphy

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

MODERATE sheen

### **Outfall Odors:**

SLIGHT odor

### **Additional Outfall Notes:**

Majority of sheen located closest to debris next to pier.

June 4, 2025 9:19 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



June 4, 2025 9:19 AM

## System O&M Data

**Bldg Temp:**

79

**Comp Hours:**

33,758.6

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

7.5

**BSW-2 Flow**

0

**BSW-2 Press**

0

**BSW-3 Flow**

0

**BSW-3 Press**

0

**BSW-4 Flow**

0

**BSW-4 Press**

1.5

**BSW-5 Flow**

0

**BSW-5 Press**

1.5

**BSW-6 Flow**

0

**BSW-6 Press**

0

**BSW-7 Flow**

0

**BSW-7 Press**

0

**BSW-8 Flow**

0

**BSW-8 Press**

5.5

**BSW-9 Flow**

0

**BSW-9 Press**

5

## System Notes:

System running normal.

## **ATG-Oronoco Site O&M Record**

### **Date:**

June 12, 2025 10:12 AM

### **Personnel:**

RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Good, no action

### **Outfall Water Conditions:**

NO sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

No sheen observed



June 12, 2025 10:12 AM

**Outfall Photo #1:**



**Outfall Photo #2:**



**Outfall Photo #3:**



**Outfall Photo #4:**



June 12, 2025 10:12 AM

## System O&M Data

**Bldg Temp:**

78

**Comp Hours:**

**Coolant:**

OK

## Pressures and Flows

**BSW-1 Flow**

0

**BSW-1 Press**

0

**BSW-2 Flow**

0

**BSW-2 Press**

0

**BSW-3 Flow**

0

**BSW-3 Press**

0

**BSW-4 Flow**

1

**BSW-4 Press**

0

**BSW-5 Flow**

1

**BSW-5 Press**

0

**BSW-6 Flow**

0

**BSW-6 Press**

0

**BSW-7 Flow**

0

**BSW-7 Press**

0

**BSW-8 Flow**

0

**BSW-8 Press**

0

**BSW-9 Flow**

0

**BSW-9 Press**

0

**System Notes:**

BSW-7 has cracked  
pressure gauge

## **ATG-Oronoco Site O&M Record**

### **Date:**

June 16, 2025 10:01 AM

### **Personnel:**

Shelby Dyer, RP Meredith

### **Weather and Tide Conditions:**

### **Outfall Boom Material:**

Replacement needed

### **Outfall Water Conditions:**

SLIGHT sheen

### **Outfall Odors:**

NO odor

### **Additional Outfall Notes:**

Will be doing boom replacement today(6-16-25)

June 16, 2025 10:01 AM

**Outfall Photo #1:**



**Outfall Photo #3:**



**Outfall Photo #2:**



**Outfall Photo #4:**



June 16, 2025 10:01 AM

System O&M Data

Bldg Temp:

78

Comp Hours:

33,871

Coolant:

OK

Pressures and Flows

BSW-1 Flow

0

BSW-1 Press

7.5

BSW-2 Flow

0

BSW-2 Press

0

BSW-3 Flow

0

BSW-3 Press

0

BSW-4 Flow

0

BSW-4 Press

1.5

BSW-5 Flow

0

BSW-5 Press

1.5

BSW-6 Flow

0

BSW-6 Press

0

BSW-7 Flow

0

BSW-7 Press

0

BSW-8 Flow

0

BSW-8 Press

5.5

BSW-9 Flow

0

BSW-9 Press

5

System Notes:

System running normal.