

**2023 ANNUAL LANDFILL INSPECTION REPORT
COAL COMBUSTION RESIDUALS FACILITY**

**EDEM REMEDIATION ONE, LLC
HOLLOW ROCK LANDFILL FACILITY
TORONTO, OHIO**

Prepared for:

EDEM Remediation One, LLC
440 Louisiana Street, Suite 900
Houston, TX 77002

Prepared by:

Key Environmental, Inc.
200 Third Avenue
Carnegie, Pennsylvania 15106



JANUARY 2024

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1.0 INTRODUCTION

The United States Environmental Protection Agency (USEPA) Administrator signed the Disposal of Coal Combustion Residuals from Electric Utilities final rule on December 19, 2014, and it was published in the Federal Register (FR) on April 17, 2015 (40 CFR Part 257, Subpart D, Final CCR Rule). The Final Rule established national regulations to provide a comprehensive set of requirements for the safe disposal of CCRs, commonly known as coal ash, from coal-fired power plants.

1.1. OBJECTIVES

This Annual Inspection Report has been prepared in compliance with the Final CCR Rule (hereinafter referred to by the applicable section of the Final CCR Rule). §257.84(b) requires that an Annual Inspection be completed by a qualified Professional Engineer and §257.84(b)(2) requires that an Annual Inspection Report be prepared. The objective of the inspection and report is to confirm that the design, construction, operation, and maintenance of the CCR facility is in good condition and conforms to standard engineering practices for the type of facility.

Key Environmental, Inc. (KEY) completed the Annual Inspection of the Hollow Rock Landfill Facility (CCR unit) in Jefferson County, Ohio. As required under the CCR Rule, the inspection included:

- A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record; and
- A visual inspection of the landfill to identify signs of distress or malfunction of the CCR unit.

Documents and data available in the facility's operating record, and other background information on the facility design, construction, operation, and maintenance were reviewed as part of the inspection process. The visual inspection of the Facility was performed on December 8, 2023, by a qualified professional engineer from KEY.

This Annual Inspection report summarizes the findings of the review of facility documents and data, and the visual inspection of the disposal site, in compliance with §257.84(b)(2). The subsequent sections provide background information on the Hollow Rock Landfill Facility, present the findings of the visual inspection; and report on the following, as required §257.84(b)(2):

- (i) Any changes in geometry of the structure since the previous Annual Inspection;
- (ii) The approximate volume of CCR contained in the unit at the time of the inspection;
- (iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and,

- (iv) Any other change(s) that may have affected the stability or operation of the CCR unit since the previous annual inspection.

1.2. OVERVIEW

The Hollow Rock Landfill Facility (HRLF, Facility) is located at 15204 State Route 152, Toronto, Ohio. It is a Class III residual solid waste landfill regulated by the Ohio Environmental Protection Agency (OEPA) that received synthetic gypsum (FGD), purge stream solids, and other approved wastes generated at the W.H. Sammis Plant (Sammis Plant). The Sammis Plant ceased electric energy production in May 2023.

The HRLF currently operates under a Permit to Install (PTI) that was issued by the Ohio Environmental Protection Agency (OEPA) in March 2008. Ownership of the HRLF and Sammis Plant was transferred from Energy Harbor Generation, LLC (Energy Harbor) to ETEM Remediation One, LLC (ER1) in September 2023. Since the transfer of ownership, ER1 has initiated assessment and design activities for closure of the Sammis Plant and the Hollow Rock Facility.

1.3. FACILITY DESCRIPTION

The HRLF was located and constructed in Knox Township, Jefferson County, Ohio on the site of a former surface mine. The Facility design capacity was approximately 26.5 million cubic yards (MCY) over 142 acres. The landfill development was to be divided into seven (7) construction phases with each phase being built sequentially and certified prior to the completion of filling the current phase. Currently, Phase 1 (Cells 1 and 2), Phase 2 (Cell 3), Phase 3 (Cell 4), and Phase 4 (Cell 5) have been constructed. Cells 1 through 4 have reached their desired elevation for their respective phases and were covered with an intermediate soil cover. Cell 5 is currently open and receiving wastes from the Sammis Plant.

Stormwater runoff is directed to one of two stormwater ponds (identified as Pond 1 and Pond 2). Water from the ponds is routed to unnamed tributaries of Hollow Rock Run and Carter Run respectively via Outfall 001 and Outfall 002 in accordance with the Facility's National Pollutant Discharge Elimination System (NPDES) permit (Permit No. 0IN00261*CD). Currently, the Facility's perimeter drainage channel and Pond 1 and Pond 2 are the only permanent stormwater features constructed.

Leachate that is collected by the Facility's underlying leachate collection/base liner system is pumped through a series of force mains to two (2) existing leachate collection basins that are located northeast of the landfill. There, the leachate is stored and subsequently pumped into tanker trucks and then hauled to the Sammis Plant where it is managed.

1.4. RELATED PERMITS

Related permit information is provided in the table below:

ACTIVITY	PERMITS / APPROVALS	STATUS	PERMIT NUMBER	EFFECTIVE DATE
Gypsum/Purge Stream Solids Placement	Hollow Rock Facility PTI	Issued	06-08263	03/28/2008
Alteration Requests – No. 1 through 12	Alterations to PTI	Approved	06-8263	Various
Alteration Request No. 13 – Salvaging Operations	Alterations to PTI	Approved	06-8263	12/19/19
Alteration Request No. 14 – Proposed Additional Waste Material Disposal	Alterations to PTI	Approved	06-8263	08/24/2023
Current Facility-wide E&S Controls and Discharge Outfalls	Individual NPDES Permit	Issued	OH0135356 / 0IN00261*CD	3/1/2019

2.0 SITE DESCRIPTION

As required by the Final CCR Rule §257.84(b)(1)(i), the existing landfill documentation is to be reviewed. This section provides an overview and summary of this review.

2.1. DESIGN CONFIGURATION

The subgrade and base liner system for Cells 1-5 was constructed in sequence from 2009 to 2016. The subgrade for each disposal cell is constructed at a maximum 33% (3 horizontal to 1 vertical) grade on the perimeter side slopes and a minimum 3.5% grade on the floor of the development phase. The base liner system consists of (from bottom to top): 18 inches of recompacted soil liner (RSL), a geosynthetic clay liner (GCL), a textured 60-mil high-density polyethylene (HDPE) liner, a double-sided geocomposite drainage layer, 12-inches of protective cover, and 18-inches of frost protection. Bottom ash from the Sammis Plant was utilized for both protective cover and frost protection.

The leachate management system consists of a geocomposite drainage layer. The bulk of the leachate generated by the deposited waste is conveyed by this geocomposite layer to a series of six (6) inch diameter perforated leachate collection pipes located along the centerline of each sub-phase and generally along the toes of the 33% internal side slopes. The collection pipes are protected by a mound of filter aggregate with a twelve (12) inch protective cover/drainage layer and drain towards a recessed collection sump located at the low point of each sub-phase area. The collection sumps house a pair of eighteen (18) inch diameter leachate extraction riser pipes. Inside the leachate risers at each sump location are extraction pumps connected to discharge pipe, power lines, and manual/automatic on/off controls. The leachate collected by the landfill cells is pumped via side slope riser pumps to the Facility's leachate storage lagoons located adjacent to the CCR disposal pad. The leachate in these lagoons is pumped utilizing an overhead loadout system into tanker trucks for transport.

In the original approved PTI (last revised in November 2007) for the Facility, two different final cover systems were identified and subsequently approved for use. The first approved final cover system included the use of two (2) feet of compacted clay with 30" of final cover protective soil, with the top six (6) inches capable of supporting vegetation. The second approved final cover system, referred to in the 2007 PTI as the "alternate" cover system, included the use of geosynthetic materials including a 40-mil linear low-density polyethylene (LLDPE) geomembrane liner, a geocomposite drainage layer with geotextiles on both sides and 30" of final cover protective soil, with the top six (6) inches capable of supporting vegetation.

2.2. ON-GOING OPERATIONS

Waste continues to be deposited to achieve the maximum disposal grade and elevation of the current disposal phase area, which is currently Cell 5. The final waste disposal slopes are a maximum 33% (3 horizontal to 1 vertical) and a minimum 5%. Slopes or areas that have been inactive for greater than 180 days receive intermediate cover consisting of twelve (12) inches of cover soil. These intermediate slopes will eventually be overlain by waste from adjacent phase areas.

2.3. VOLUME OF CCR

As required by the Final CCR Rule §257.84(b)(2)(ii), an estimate of the volume of CCR in the landfill is to be provided as part of the Annual Inspection Report. The 2021 Annual Inspection report prepared by Energy Harbor indicated that the total volume of material emplaced in the landfill was approximately 3,608,915 cubic yards (CY). According to the Annual Operations Report for the Facility prepared by Energy Harbor, an additional 186,250 CY was placed into the unit during 2022. Additionally, an aerial survey was completed on August 26 and September 11, 2023, by Lennon, Smith, Souleret Engineering, Inc. (LSSE). This survey was compared to an aerial drone survey completed by RPG Resources, Inc. in October 2022, and the topographic data was compared to identify changes in the configuration. Appendix A provides an aerial image (Figure 1) as well as a volume comparison figure (Figure 2) that was used to determine the volume change. Based on this comparison, an estimated additional 65,940 CY of CCR and soil was placed in the Facility in 2023. Therefore, the Hollow Rock Landfill contains approximately 3,861,105 CY of material.

3.0 ANNUAL INSPECTION SUMMARY

As required by the Final CCR Rule §257.84(b)(1)(ii) a visual inspection of the landfill was conducted. This section of the report provides a brief description of the inspection process that was completed.

3.1. INITIAL SITE REVIEW

The Annual Inspection was conducted by Mr. Mark Lahr, P.E. of KEY on Friday, December 8, 2023. Mr. Lahr had reviewed the previous reports, designs, and other reporting files prior to the site inspection.

3.2. INSPECTION SUMMARY

The inspection proceeded in a counterclockwise manner from the southeastern side of the Facility. Appendix B provides the *Landfill Annual Field Inspection Report* (Field Report). The Field Report provides a figure depicting the approximate locations of any noted conditions. Appendix C provides a photographic log of the landfill and associated facilities. The Hollow Rock Landfill is in good structural condition.

Changes in Geometry [§257.84(b)(2)(i)]

There were no changes to slopes in the form of slides, sloughs or bulges, or other indication of deformation or other indicators of instability.

Structural Weakness [§257.84(b)(2)(iii)]

No indication was found of an actual or potential structural weakness of the CCR unit or any existing condition that was disrupting or had the potential to disrupt the operation and safety of the CCR unit and appurtenant structures.

Other Changes [§257.84(b)(2)(iv)]

No changes were found to the CCR unit that could affect the stability or operation of the Facility since the previous inspection.

4.0 RECOMMENDATIONS

4.1 RECOMMENDATIONS – NORMAL MAINTENANCE

Based on the Annual Inspection, the following normal maintenance items are recommended to be completed as site conditions allow:

- Clear the landfill perimeter ditch of excessive vegetation (brush and small trees) and remove any sediment accumulated in the ditch outlet pipes for Stormwater Pond 1 and 2;
- For Stormwater Pond 1, the brushy vegetation at the emergency spillway should be cut; and,
- For Stormwater Pond 2, the discharge end of the outlet pipe should be cleared and the rock apron repaired.

4.2 RECOMMENDATIONS OTHER THAN NORMAL MAINTENANCE

None.

4.3 DEFICIENCIES DISCOVERED

As noted in the Final CCR Rules “If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken” [§257.84(b)(5)].

No deficiencies or releases were observed as part of this Annual Inspection.

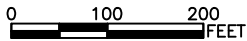
4.4 CORRECTIVE MEASURES

No corrective measures are required based on the observations noted as part of this Annual Inspection.

APPENDIX A

FIGURES

v:\000\etm\hollow rock\production drawings\5_annual inspection report\figure 1 - aerial plan.dwg Last Saved By: Emoloney 1/8/2024 4:22 PM Plotted By: Elizabeth Maloney 1/8/2024 4:44 PM Scale: 1/2



ETEM REMEDIATION ONE, LLC

DRWN: ERM
CHKD: MRK
APPD: MRL
SCALE:

DATE: 01/08/24
DATE: 01/08/24
DATE: 01/09/24
1" = 100'



ANNUAL LANDFILL INSPECTION
HOLLOW ROCK LANDFILL FACILITY
KNOX TOWNSHIP, JEFFERSON COUNTY, OHIO

2023 DRONE AERIAL

PROJECT NO: 22-497
FIGURE 1

REFERENCE: AERIAL PHOTO SHOWN HEREON WERE OBTAINED FROM AERIAL DRONE SURVEYS COMPLETED BY LENNON, SMITH, SOULERET ENGINEERING, INC. (LSSE) ON AUGUST 26 AND SEPTEMBER 11, 2023.

ISSUE DATE:

KEY ENVIRONMENTAL, INC.
200 THIRD AVENUE
CARNEGIE, PA 15106

REV #	DATE	DESCRIPTION	APPD

APPENDIX B
LANDFILL ANNUAL FIELD INSPECTION REPORT

LANDFILL ANNUAL FIELD INSPECTION REPORT
Hollow Rock Landfill Facility

Page 1 of 2

Inspection Date: 12/08/2023

Weather Conditions: Partly Cloudy 45°F to 50°F

CCR Unit: Hollow Rock Landfill Facility

Original PTI Number: 06-08263

Current Construction / Design Details:

18 inch thick recompact soil liner, GCL, 60 mil geomembrane, 12 inch protective / drainage layer, 18 inch frost protection layer, gypsum waste material, 12 inch temporary cover soil, and partial grass ground cover.

Action

None	Monitor	Repair	Engineer
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GENERAL CONDITIONS

Access Roads - some minor grading was completed.

Fencing

Structures

Groundwater Monitoring Wells

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

TEMPORARY COVER SLOPES

Cover Vegetation:

Woody Brush? Describe and Locate: some small trees / brush noted on temporary cover and at toe drainage channels.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Grass Ground Cover:

Condition: thick vegetative mat on Cells 1,2,3,4.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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No cover soil on crown area of cell 5.

Surface Damage:

Soil Erosion Rills on temporary cover placed on Cell 5 slopes

Bench Channels

Haul Roads

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Slope Instabilities:

Slides / Sloughs

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Cracks / Bulges

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Water Seeps / Saturated Areas

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Other

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Other

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LANDFILL ANNUAL FIELD INSPECTION REPORT
Hollow Rock Landfill Facility

Page 2 of 2

None	Action		
	Monitor	Repair	Engineer

Hydraulic Structures

Leachate Pumping System and Storage Ponds

Sump Pumps Manholes and Control Panels

Visible forcemains, manholes, and cleanouts

Leachate storage pond lining

Leachate loadout equipment and pad

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Bench Drains

Grass-lined berm

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Perimeter Channel

10-feet wide grass lined channel of variable slope

Culverts from perimeter channel discharge to riprap - *Note 1*

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Stormwater Pond 1

2-acre pond with grass vegetation

15-feet wide crest berm with 3H:1V side slopes

Broad crested weir emergency overflow spillway - *Note 2*

Outlet Structure: Corrugated metal pipe standpipe

Trashrack and anti-vortex inlet

Discharge Conduit: 24-inch diameter HDPE Pipe

Discharge Channel: rip-rap lined channel

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Stormwater Pond 2

2-acre pond with grass vegetation

15-feet wide crest berm with 3H:1V side slopes

Broad crested weir emergency overflow spillway

Outlet Structure: Corrugated metal pipe standpipe

Trashrack and anti-vortex inlet

Discharge Conduit: 24-inch diameter HDPE Pipe - *Note 3*

Discharge Channel: rip-rap lined channel

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments / Additional Remarks

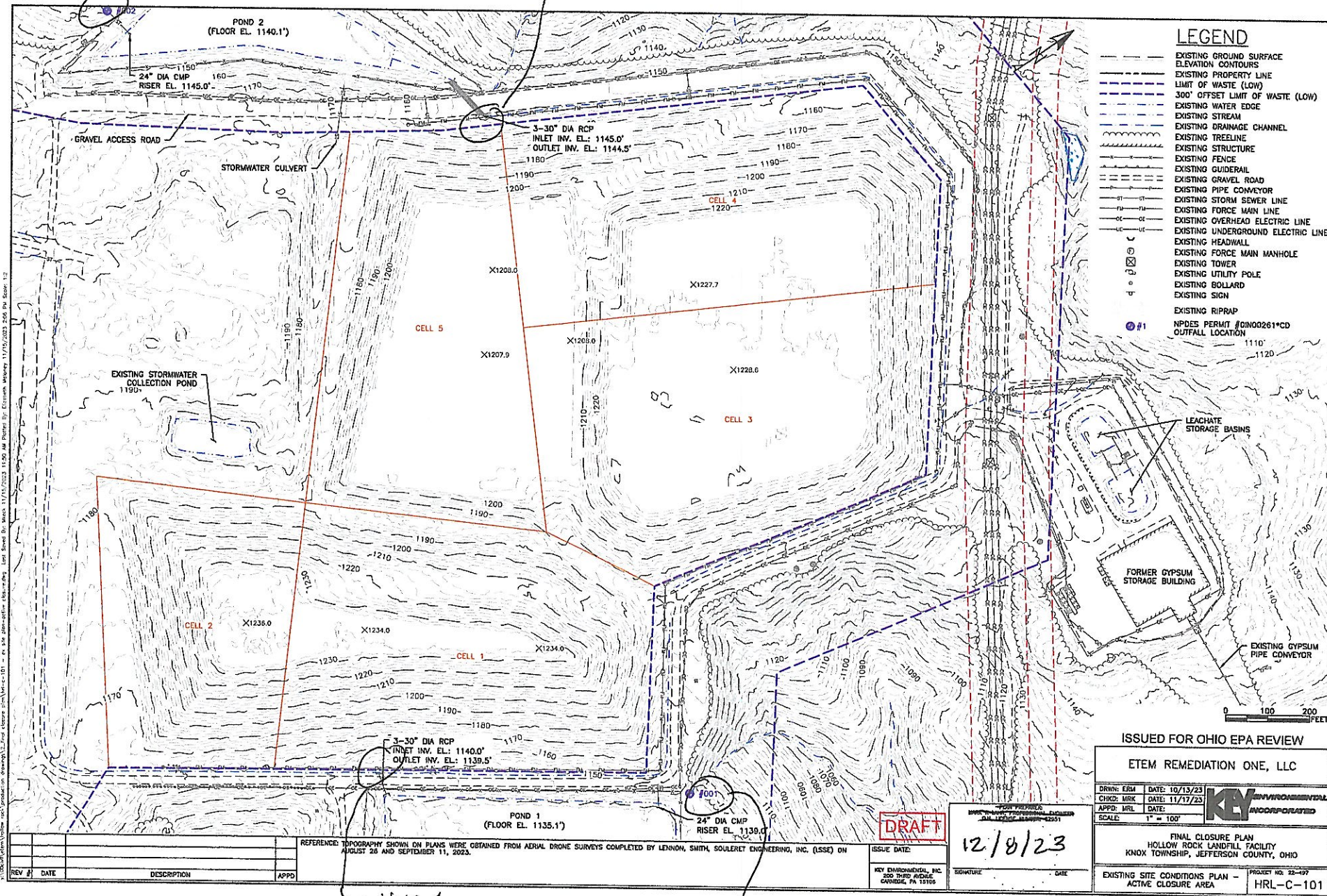
- 1- vegetation and sediment blocking landfill side of inlet pipes.
- 2- overgrown vegetation should be cleared.
- 3- discharge end of pipe is partially buried.

Inspector Signature: Mark Lahr

Inspector Print Name: Mark Lahr

Note 3

Note 1



APPENDIX C
PHOTOGRAPHIC LOG

Photo: 1

Date: 01/08/2023

Description:

Access Road Condition



Photo: 2

Date: 01/08/2023

Description:

Cell 1 Sump Control Panel



Photo: 3

Date: 01/08/2023

Description:

Cell 1 Sump Risers and Force Main Connection



Photo: 4

Date: 01/08/2023

Description:

Southeastern Edge of Cell 1



Photo: 5

Date: 01/08/2023

Description:

Northern Edge of Cell 1



Photo: 6

Date: 01/08/2023

Description:

Eastern Edge of Cell 3



Photo: 7

Date: 01/08/2023

Description:

Northern Edge of Cell 3



Photo: 8

Date: 01/08/2023

Description:

Leachate Basin (typical)



Photo: 9

Date: 01/08/2023

Description:

Western side of Cell 4



Photo: 10

Date: 01/08/2023

Description:

Western Edge of Cell 5



Photo: 11

Date: 01/08/2023

Description:

West Side of Cell 5 at Outlet Pipes to Pond 2



Photo: 12

Date: 01/08/2023

Description:

Closeup of Channel Outlet Pipes to Pond 2



Photo: 13

Date: 01/08/2023

Description:

Pond 2 and Principal Spillway Riser



Photo: 14

Date: 01/08/2023

Description:

Pond 2 Outlet Pipe Discharge End



Photo: 15

Date: 01/08/2023

Description:

Cell 5 Gypsum and Cell 4 Vegetation



Photo: 16

Date: 01/08/2023

Description:

Cell 4 Top Vegetation



Photo: 17

Date: 01/08/2023

Description:

Cell 3 and 4 Top Vegetation and
Chimney Drain Pipe



Photo: 18

Date: 01/08/2023

Description:

Cell 4 Top and View of Cell 1 and 2



Photo: 19

Date: 01/08/2023

Description:

Cell 3 Top and View of Cell 2



Photo: 20

Date: 01/08/2023

Description:

Cell 4 North Face Some Surface Erosion (ATV)



Photo: 21

Date: 01/08/2023

Description:

Cell 4 Western Top/Edge (Pond 2 distant)



Photo: 22

Date: 01/08/2023

Description:

Cell 4 Southern Edge and Cell 5 Top



Photo: 23

Date: 01/08/2023

Description:

Cell 5 Slope Cover Soil / Sparse Vegetation



Photo: 24

Date: 01/08/2023

Description:

Cell 5 West Slope Some Erosion Rills



Photo: 25

Date: 01/08/2023

Description:

Cell 1 Top and Southeastern Edge



Photo: 26

Date: 01/08/2023

Description:

Cell 1 Eastern Top / Slope



Photo: 27

Date: 01/08/2023

Description:

Cell 2 Southwestern Slope Vegetation



Photo: 28

Date: 01/08/2023

Description:

Cell 2 Western Edge Access



Photo: 29

Date: 01/08/2023

Description:

Cell 2 Top / Edge Looking West, Cell 5
Edge (top right)



Photo: 30

Date: 01/08/2023

Description:

Ditch Outlet Pipes to Pond 1



Photo: 31

Date: 01/08/2023

Description:

Pond 1 Principal Outlet



Photo: 32

Date: 01/08/2023

Description:

Pond 1 Outlet Pipe Discharge End



Photo: 33

Date: 01/08/2023

Description:

Pond 1

