2022 ANNUAL CCR UNIT INSPECTION

INDIAN RIVER LANDFILL

NRG INDIAN RIVER STATION

DAGSBORO, DELAWARE

SCS ENGINEERS

25221158.00 | January 18, 2023

40 Shuman Blvd, Suite 216
Naperville, IL 60563

1.0 INTRODUCTION

1.1 OVERVIEW OF ANNUAL INSPECTION REPORT

SCS Engineers (SCS) has completed an annual inspection of the NRG Indian River Landfill (IRLF) at the Indian River Generating Station in Dagsboro, Delaware. The annual inspection was completed in accordance with the U.S. Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule, 40 CFR 257 Subpart D (CCR Rule). Per 40 CFR 257.84(b)(1), an annual inspection is required to be conducted by a qualified professional engineer for all existing and new CCR landfills and any lateral expansion of a CCR landfill. For the Indian River Generating Station (owned by Indian River Power, LLC, a subsidiary of NRG Energy, Inc. [NRG]), this inspection requirement applies to Phase II of the existing Indian River Landfill.

The purpose of the annual inspection is to evaluate whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The findings from this annual inspection are summarized in subsequent sections of this report, in accordance with 40 CFR 257.84(b)(2).

This report must be placed in the Indian River facility's operating record per §257.105(g)(9), noticed to the State Director per §257.106(g)(7), and posted to the publicly accessible internet site per §257.107(g)(7). The 2021 annual inspection report was placed into the facility's operating record on January 18, 2022. Therefore, this report must be placed into the facility's operating record on or beforeJanuary 18, 2023, to meet the annual reporting requirements of §257.84(b)(4).

1.2 OVERVIEW OF INDIAN RIVER LANDFILL

The Indian River Landfill is an industrial waste landfill used to dispose CCR and other industrial wastes generated at the station. The landfill is permitted by State of Delaware Department of Natural Resources and Environmental Control (DNREC) Solid Waste Permit No. SW-22/02. Permit SW-22/02 was issued on September 15, 2022 as a renewal to the previous Solid Waste Permit No. SW-12/01.

The landfill consists of two major phases. Phase I is a 46-acre unlined, closed landfill that was operated between 1980 and 2014. Phase II is a 28-acre landfill expansion of Phase I that overlays the western slopes of Phase I and expands the landfill footprint to the west. Phase II has two landfill cells (Cells 1 and 2). The east portion of both Cells 1 and 2 overlays onto the western sideslopes of Phase I. Both landfill cells, including the overlay area, have a composite liner system at their base.

The Phase II expansion began accepting waste on September 17, 2010, within Cell 1. Cell 2 received operational authorization in 2015. Cell 1 is not actively receiving CCR material and has a vegetated intermediate cover. Cell 2 is currently open and actively receiving CCR material. No areas of Phase II have received final cover as described in §257.102(d)(3).

2.0 ANNUAL INSPECTION

Mr. Richard Southorn, a qualified professional engineer with SCS, conducted the 2022 annual on-site inspection of IRLF on October 18, 2022. The annual inspection and evaluation focused on the following items as outlined in §257.84(b)(1)(i-ii):

- 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 CCR unit to identify signs of distress or malfunction.

Per §257.84(b)(2) (i-iv), the following aspects of the CCR unit must be documented as part of the annual inspection:

- Any changes in geometry of the structure since the previous annual inspection;
- The approximate volume of CCR contained in the unit at the time of the inspection;
- 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
- Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

2.1 REVIEW OF OPERATING RECORD

The operating records review of the facility's operating record and verification were performed before and during the site inspection. Files reviewed included, but were not limited to:

- 2011 Phase II Landfill Expansion Application;
- NRG Permit SW-22/02;
- Previous Annual Landfill Operations Report;
- CCR Rule Inspection Reports;
- Leachate Collection System Daily Inspection Reports;
- Daily/After Storm Event Erosion Control/Emissions Inspection Forms;
- Disposal volume records provided by Indian River; and
- Miscellaneous reports and documents on NRG's CCR Rule Compliance Data Website. (https://www.nrg.com/legal/coal-combustion-residuals.html)

During the site inspection, Mr. Southorn interviewed Mr. David Roesler (Landfill Manager) to verify the information contained within the operating record.

2.2 VISUAL INSPECTION

A visual inspection of the landfill was completed after review of the Operating Record to identify signs of distress or malfunction of the CCR unit. The visual inspection included observations of the following:

- Active disposal area (Phase II, Cell 2);
- Intermediate cover areas (Phase II);
- Final Cover areas (Phase I);
- Non-contact storm water run-on and run-off control features, including terrace benches, swales, downchutes, and sedimentation detention basins; and
- Leachate collection pump houses.

Mr. Southorn focused on standard geotechnical signs of distress or malfunction such as slumping at the toe of slope, tensile cracking, abnormal or excessive erosion on the side slopes or stormwater management facilities, slope bulging, groundwater/surface water seepage or ponding, etc. These visual signs are potential indicators of structural weakness of the CCR Landfill unit.

A checklist documenting inspection findings is provided as **Attachment 1** to this report. Photographs taken during the inspection are provided as **Attachment 2** to this report. Findings are reported in **Section 3** of this report.

3.0 REGULATORY FINDINGS OF ANNUAL INSPECTION

CCR Rule Documentation Requirement §257.84(b)(2):	Annual Inspection Findings
§257.84(b)(2)(i): *(i) Any changes in geometry of the structure since the previous annual inspection;"*	Changes in geometry include the placement of CCR and intermediate cover in Phase II Cell 2.
§257.84(b)(2)(ii): *"(ii) The approximate volume of CCR contained in the unit at the time of the inspection;"*	Phase II design documents indicate that Cells 1 and 2 have a total combined disposal capacity of approximately 2.2 Million cubic yards (cy). Cell 1 has approximately 1,194,000 cy total disposal capacity, while Phase II has approximately 1,006,000 cy total disposal capacity. **Cell 1:** Cell 1 has largely been filled, but NRG Energy estimates that Phase II Cell 1 has approximately 5,000 cy of emergency capacity left in the event that Cell 2 becomes inaccessible. Therefore, Cell 1 is estimated to contain **1,189,000 cy** of CCR material. **Cell 2:** At the end of calendar year 2021, approximately **299,455 cy** had been placed in Phase II Cell 2. An additional **21,168 tons** of CCR material were placed in Phase II Cell 2 in 2022. This equates to **18,900 cy**, based on an assumed conversion factor of 1 cy = 1.12 ton. Therefore, the estimated total volume disposed in Phase II Cell 2 is **318,355 cy** (299,455 cy + 18,900 cy). **Phase II (Cells 1 and 2):** The estimated total disposed volume in Phase II is **1,507,355 cy** (1,189,000 cy + 318,355 cy). It is noted that the conversion factor is based on design documents in the Phase II permit application. Additionally, Phase I volumes have not been evaluated because Phase I was closed prior to the inception of the CCR Rule and is not regulated under the CCR Rule.

CCR Rule Documentation Requirement §257.84(b)(2):	Annual Inspection Findings
§257.84(b)(2)(iii): *"(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;"*	At the time of this inspection, there were no signs of actual or potential structural weakness or existing conditions that are disrupting or have the potential to disrupt the operation and/or safety of the CCR landfill. No signs of distress or malfunction were observed.
§257.84(b)(2)(iv): *"(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.*	There have been no changes observed during the annual inspection that have affected the stability or operation of the CCR unit since the previous annual inspection. In 2022, NRG installed intermediate cover over large portions of Phase II Cell 2 to minimize contact water generation.

4.0 RECOMMENDATIONS

Based on the on-site inspection performed on October 18, 2022, SCS recommends the following actions:

1. Continue operation, inspections, and maintenance within the active landfilling area as currently performed.

There were no deficiencies or releases identified during the 2022 annual inspection that require the owner or operator to perform corrective actions as required under §257.84(b)(5).

5.0 PROFESSIONAL ENGINEER'S CERTIFICATION

In accordance with §257.84(b) of the CCR Rule, I hereby certify based on a review of available information within the facility's operating records and observations from my personal on-site inspection that the IRLF does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations of the IRLF. The unit is being operated and maintained consistent with recognized and generally accepted good engineering standards and practices.

Certified by: Richard Southorn

Date: January 18, 2023

Richard Southorn, P.E.
Professional Engineer Registration No. PE 20894
SCS Engineers

ATTACHMENTS

1. Site Map
2. Inspection Photo Log

REFERENCES

1. 2022 Landfill Periodic Inspection Report (dated January 18, 2022)
2. Annual Landfill Operations Reports, NRG Energy Indian River Generating Station
3. 40 Code of Federal Regulations Part 257.
4. Routine Inspection Reports.
5. DNREC Solid Waste Permit No. 22/02
6. CCR Rule Documents on NRG website (https://www.nrg.com/legal/coal-combustion-residuals.html)

Attachment 1

Coal Combustion Residuals Landfill

Annual Inspection Checklist

CCR LANDFILL ANNUAL INSPECTION CHECKLIST

Facility Name	Feature	Inspection Date
Indian River Landfill	Indian River Landfill	October 18, 2022

Station/Owner	State
Indian River Power (NRG)	Delaware

Inspected By	Phone No.	Type of Landfill	
Richard Southorn	(630) 957-7653	☒ Active	☐ Closed

Weather				Temperature (°F)
☐ Wet	☒ Dry	☐ Snow Cover	☐ Other:	45

Total precipitation last 24 hours (in)
0

Remarks:
Annual inspection by qualified engineer.

OPERATIONS	CHECKS AND OBSERVATIONS			
	1. Is the haul route maintained?	☒ Yes	☐ No	☐ N/A
	2. Are stormwater BMPs inspected and serviceable?	☒ Yes	☐ No	☐ N/A
	3. Is the leachate system functional?	☒ Yes	☐ No	☐ N/A
	4. Is there evidence of erosion?	☐ Yes	☒ No	☐ N/A
	5. Are stormwater retention basins functioning properly?	☒ Yes	☐ No	☐ N/A
	Comments / Action Items			

Actions	☒ None	☐ Maintenance	☐ Monitoring	☐ Minor Repair	☐ Engineering

UPPER LANDFILL SURFACE	PROBLEMS				COVER
	☒ 1. None	☐ 5. Vegetation, brush	☐ 9. Settlement	☐ 13. Seepage	☒ Vegetation
	☐ 2. Animal burrows	☐ 6. Vegetation, islands	☐ 10. Cracks	☐ 14. Ponding	☐ Gravel
	☐ 3. Animal damage	☐ 7. Poor grass cover	☐ 11. Erosion	☐ 15. Bare spots	☐ Soil
	☐ 4. Trees, large brush	☐ 8. Slope stability	☐ 12. Rills	☐ 16. Other:	☒ Other: CCR
	Comments / Action Items				

Actions	☒ None	☐ Maintenance	☐ Monitoring	☐ Minor Repair	☐ Engineering

SLOPES AND PERIMETER BERMS	PROBLEMS				COVER
	☒ 1. None	☐ 5. Vegetation, brush	☐ 9. Settlement	☐ 13. Seepage	☒ Vegetation
	☐ 2. Animal burrows	☐ 6. Vegetation, islands	☐ 10. Cracks	☐ 14. Ponding	☐ Gravel
	☐ 3. Animal damage	☐ 7. Poor grass cover	☐ 11. Erosion	☐ 15. Bare spots	☐ Soil
	☐ 4. Trees, large brush	☐ 8. Slope stability	☐ 12. Rills	☐ 16. Other:	☐ Other:

OBSERVATIONS			
1. Do slopes and berms provide positive drainage?	☒ Yes	☐ No	☐ N/A
2. Is there exposed waste on exterior slopes?	☐ Yes	☒ No	☐ N/A

Comments / Action Items

None.

Actions	☒ None	☐ Maintenance	☐ Monitoring	☐ Minor Repair	☐ Engineering

LEACHATE SYSTEM	PROBLEMS				
	☒ 1. None	☐ 3. Piping leaking	☐ 5. Tank leaking		
	☐ 2. Sump	☐ 4. Containment leaking	☐ 6. Other:		

OBSERVATIONS			
1. Is the leachate transmission system functioning properly?	☒ Yes	☐ No	☐ N/A

Comments / Action Items

None.

Actions	☒ None	☐ Maintenance	☒ Monitoring	☐ Minor Repair	☐ Engineering

EROSION AND SEDIMENT CONTROLS						
	PROBLEMS					
	☒ 1. None	☐ 3. Ditch failure	☐ 5. Debris	☐ 7. Silt fences	☐ 9. Riprap aprons	
	☐ 2. Channel	☐ 4. Ditch washouts	☐ 6. Sediment	☐ 8. Filter socks	☐ 10. Other:	
	OBSERVATIONS					
	1. Are erosion or sediment controls in place?			☒ Yes	☐ No	
	2. Are drop structures in good repair?			☒ Yes	☐ No	☐ N/A
	3. Are perimeter run-on diversion ditches present and in good repair?			☒ Yes	☐ No	☐ N/A
	4. Are perimeter run-off diversion ditches present and in good repair?			☒ Yes	☐ No	☐ N/A
	Comments / Action Items None.					
	Actions	☒ None	☐ Maintenance	☐ Monitoring	☐ Minor Repair	☐ Engineering

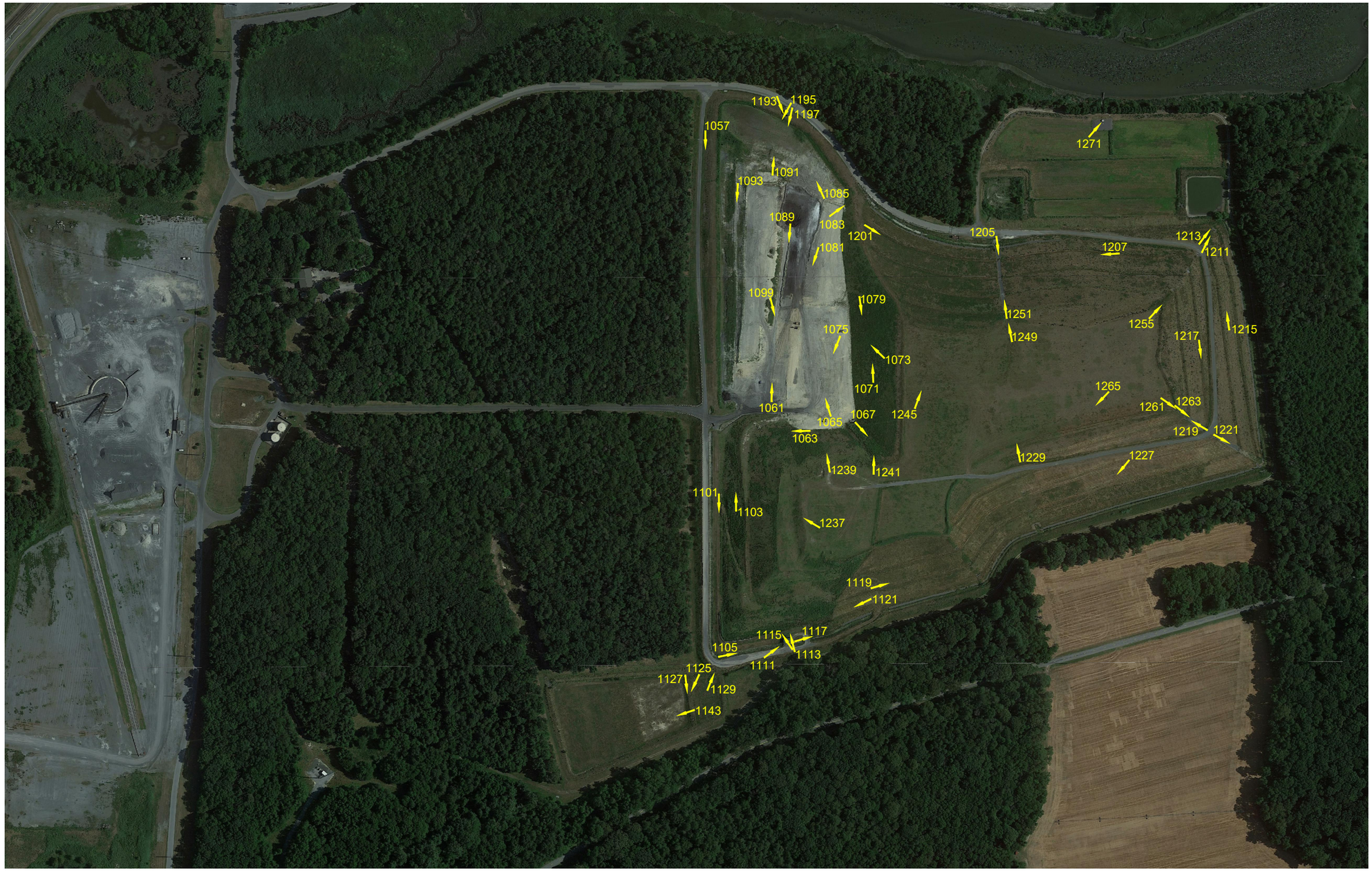
Inspector's Signature: _____

Date: October 18, 2022 .

Attachment 2

Coal Combustion Residuals Landfill

Annual Inspection Photographs



N

400 0 400

SCALE: 1" = 400'

PROJECT NO.	25221158.00	DRAWN BY:	SJL
DRAWN:	1/11/2023	CHECKED BY:	RDS
REVISED:	N/A	APPROVED BY:	RDS

ENGINEER: SCS ENGINEERS
40 SHUMAN BLVD., STE. 216, NAPERVILLE, IL 60563
PHONE: (331) 806-4300

CLIENT: INDIAN RIVER GENERATING STATION
DAGSBORO, DE

SITE: INDIAN RIVER LANDFILL
DAGSBORO, DE

2022 ANNUAL INSPECTION
PHOTOGRAPH LOCATION MAP

FIGURE
1 OF 1

I:\25221158.00\Drawings\Annual Inspections\2022 Photolog\2022 Photo Log.dwg, 1/11/2023 5:00:58 PM

Indian River Landfill - 2022 Annual Inspection
Dagsboro, DE
SCS Engineers Project 25221158.00

Image Number:	1057
Date:	October 18, 2022
Time:	6:55 AM
Direction:	South

Description: Outer side slope of Phase II, Cell 2. The side slope is well vegetated and maintained. No signs of vegetative stress, erosion, or geotechnical instability.

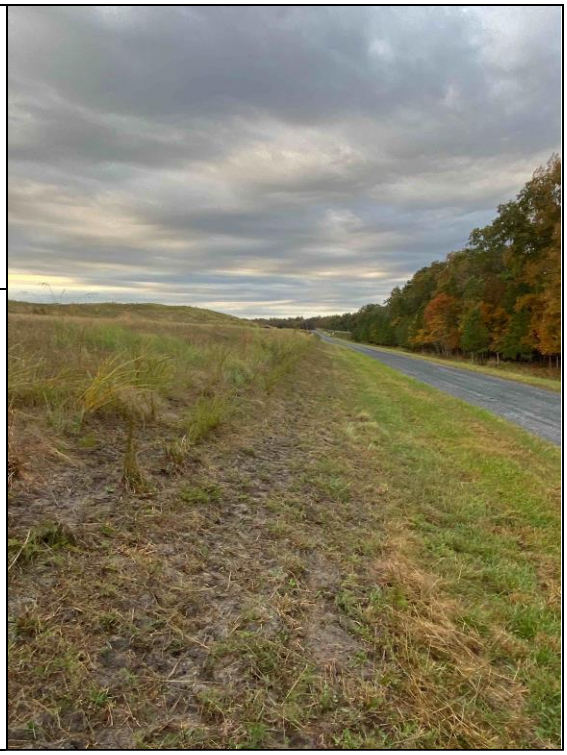
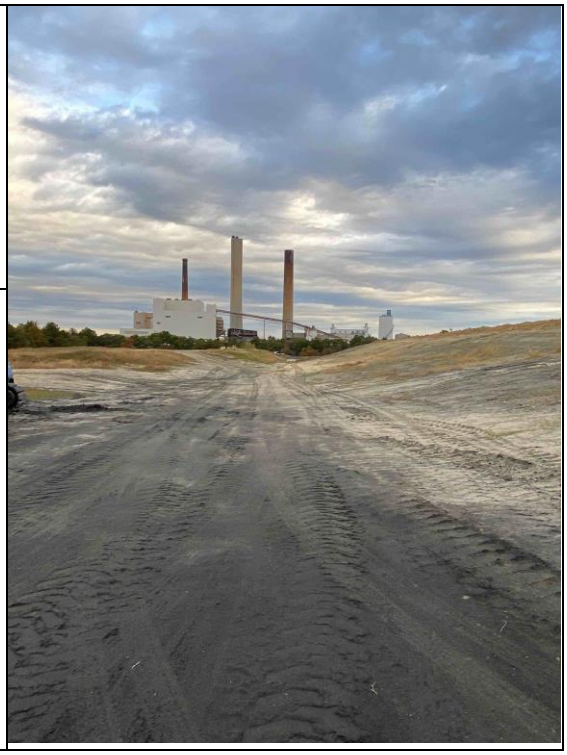


Image Number:	1061
Date:	October 18, 2022
Time:	7:01 AM
Direction:	North

Description: Intermediate cover has been placed over Phase II, Cell 2 during periods of inactivity. Material is well graded and compacted.



Indian River Landfill - 2022 Annual Inspection
Dagsboro, DE
SCS Engineers Project 25221158.00

Image Number:	1063
Date:	October 18, 2022
Time:	7:03 AM
Direction:	West

Description: Phase II, Cell 1 / Cell 2 boundary. Slopes are well vegetated with no sign of erosion, sloughing, or animal borrows.

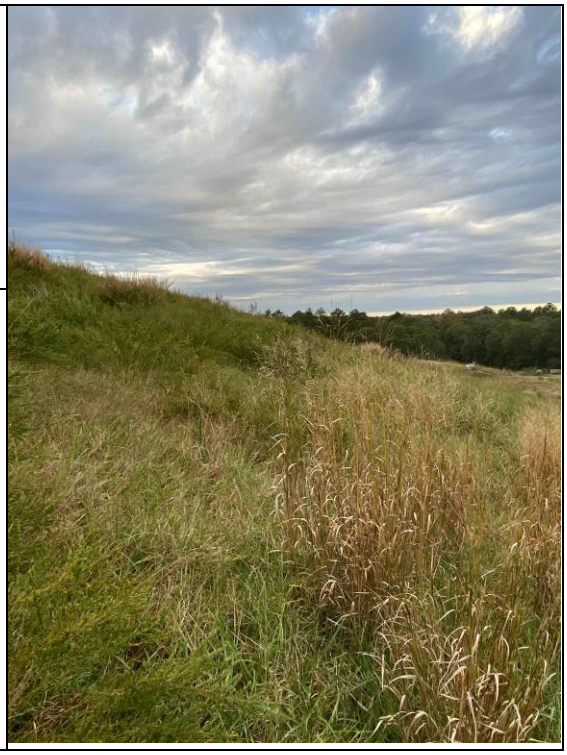
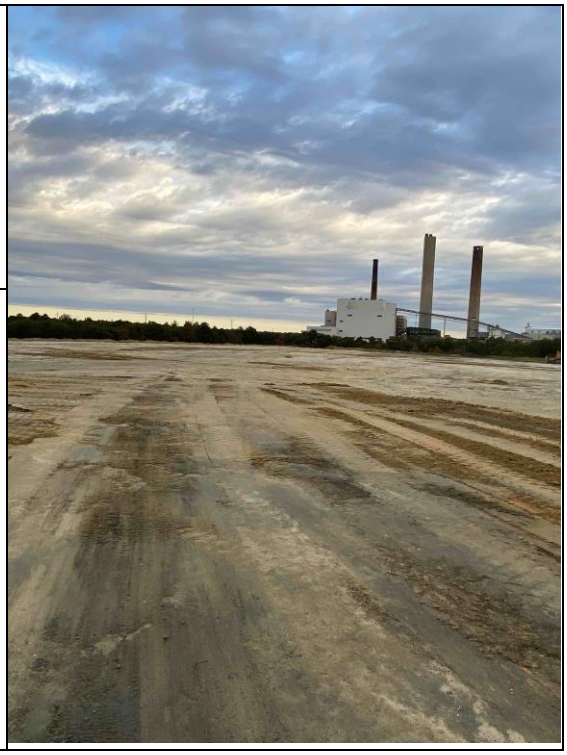


Image Number:	1065
Date:	October 18, 2022
Time:	7:04 AM
Direction:	North-Northwest

Description: Active face is well maintained. Material is graded and compacted.



Indian River Landfill - 2022 Annual Inspection
Dagsboro, DE
SCS Engineers Project 25221158.00

Image Number:	1067
Date:	October 18, 2022
Time:	7:04 AM
Direction:	Southeast

Description: Elbow of Phase I/Phase II Cell 1 confluence, looking upslope. Vegetation is thick and healthy.

Image Number:	1071
Date:	October 18, 2022
Time:	7:06 AM
Direction:	North

Description: Overview of the active face and Phase I intermediate cover slopes. Slopes are well vegetated with no signs of erosion, sloughing, or animal borrows.

Indian River Landfill - 2022 Annual Inspection
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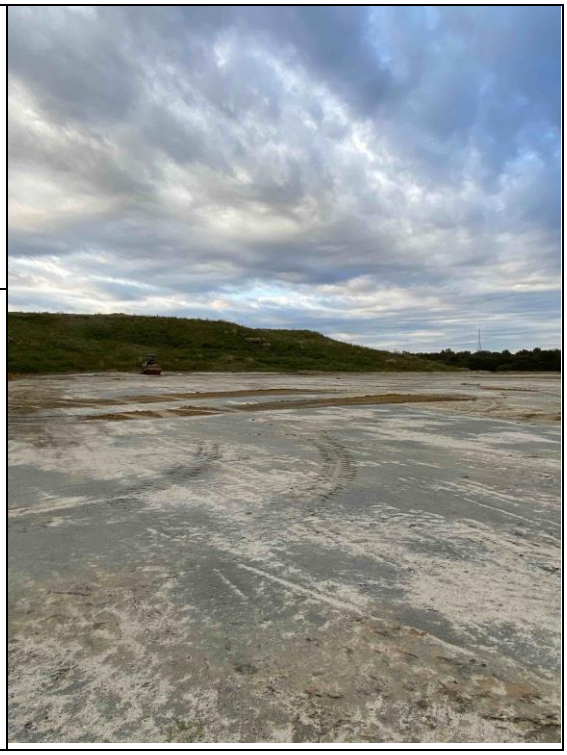
Image Number:	1073
Date:	October 18, 2022
Time:	7:06 AM
Direction:	Northwest

Description: Active face in the background is well maintained and orderly. Material is graded and compacted.

Image Number:	1075
Date:	October 18, 2022
Time:	7:08 AM
Direction:	South-Southwest

Description: Intermediate cover soils in foreground have been installed at the toe of slope within Phase I to collect and transfer non-contact water to the north and away from the active face.



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SCS Engineers Project 25221158.00

Image Number:	1079
Date:	October 18, 2022
Time:	7:11 AM
Direction:	South

Description: Vegetation on side slopes is well established. No signs of erosion, sloughing, or animal borrows.

Image Number:	1081
Date:	October 18, 2022
Time:	7:12 AM
Direction:	South-Southwest

Description: Active face is well graded and maintained

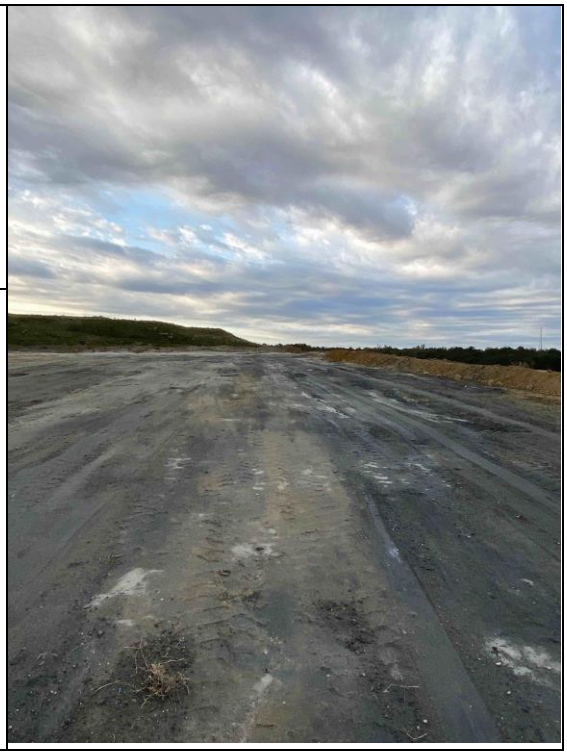

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Image Number:	1083
Date:	October 18, 2022
Time:	7:13 AM
Direction:	East-Northeast

Description: Intermediate cover soils at the toe of slope within Phase I drain north to this location. Non-contact water enters into this pipe shown in the middle of the photograph and is conveyed to the adjacent landfill perimeter (non-contact water) ditch.

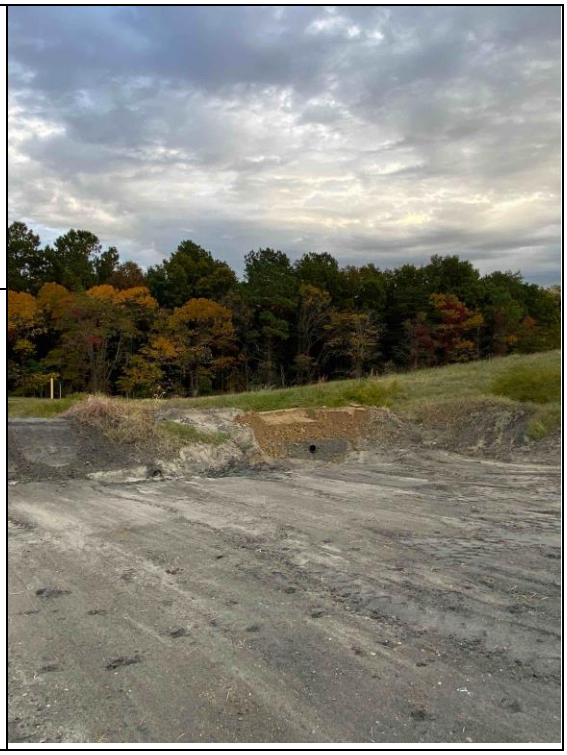
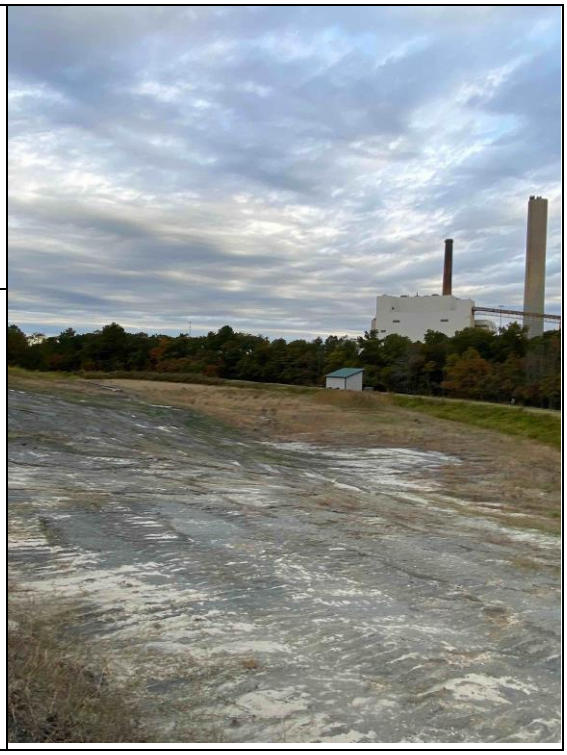


Image Number:	1085
Date:	October 18, 2022
Time:	7:13 AM
Direction:	North-Northwest

Description: Overview of sump area of Phase II, Cell 2. No standing water/leachate. Intermediate cover soils are in foreground. Water that lands on top of intermediate cover soils are managed as non-contact water.



Indian River Landfill - 2022 Annual Inspection
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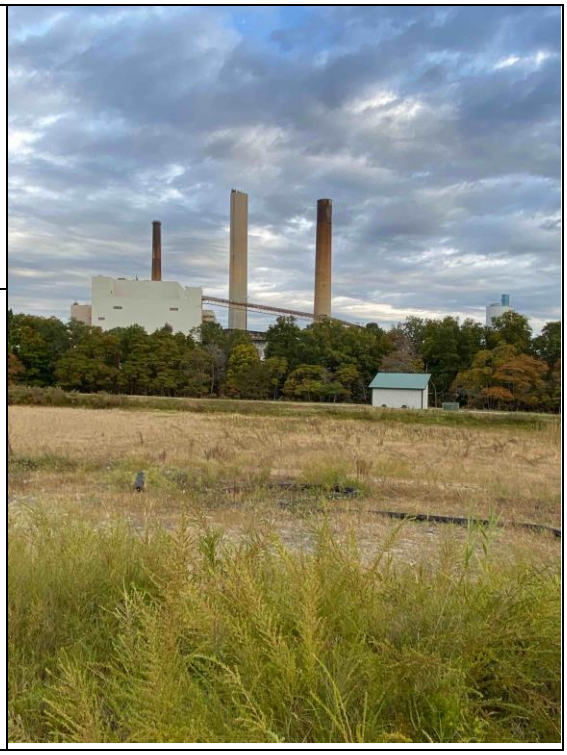
Image Number:	1089
Date:	October 18, 2022
Time:	7:15 AM
Direction:	South

Description: Interior drainage ditch for contact water collection and diversion to the Phase II, Cell 2 sump.

Image Number:	1091
Date:	October 18, 2022
Time:	7:17 AM
Direction:	North

Description: Sump area within the Phase II, Cell 2 area that collects contact water. No standing water was observed.



Indian River Landfill - 2022 Annual Inspection
Dagsboro, DE
SCS Engineers Project 25221158.00

Image Number:	1093
Date:	October 18, 2022
Time:	7:31 AM
Direction:	South

Description: Diversion berm and ditch with intermediate cover soils to collect and transfer non-contact water from the western, exterior side slope of the active area. Diversion ditch conveys non-contact water to the south and away from the active face.

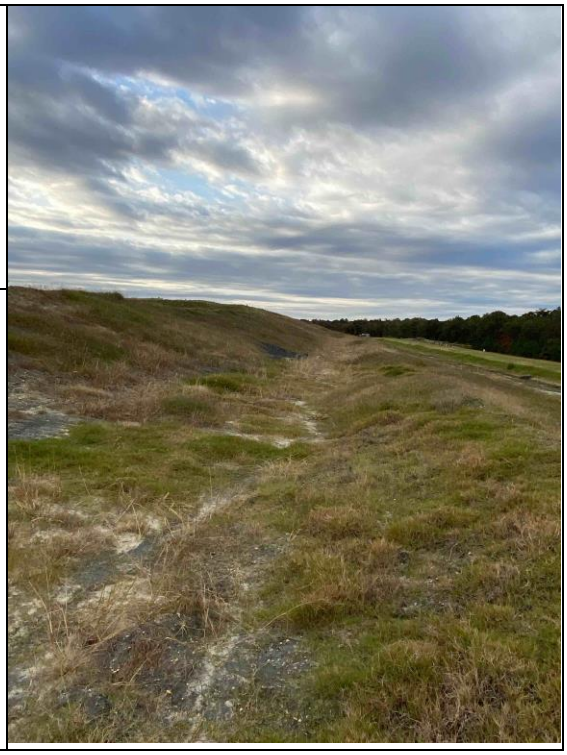
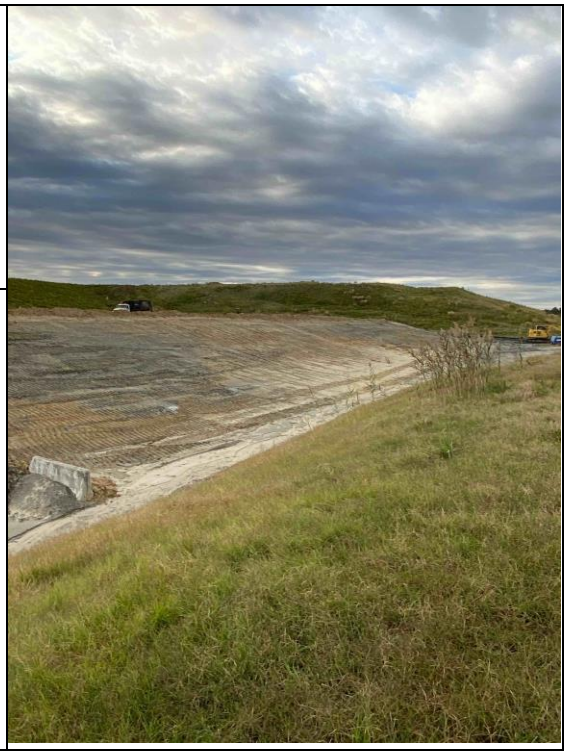


Image Number:	1099
Date:	October 18, 2022
Time:	7:36 AM
Direction:	South-Southeast

Description: Interior drainage ditch for contact water collection. Jersey barriers and rock checks are used to slow water and minimize erosion.



Indian River Landfill - 2022 Annual Inspection
Dagsboro, DE
SCS Engineers Project 25221158.00

Image Number:	1101
Date:	October 18, 2022
Time:	7:49 AM
Direction:	South

Description: Drainage ditch of Phase II, Cell 1. Vegetation is well established and is periodically mowed.

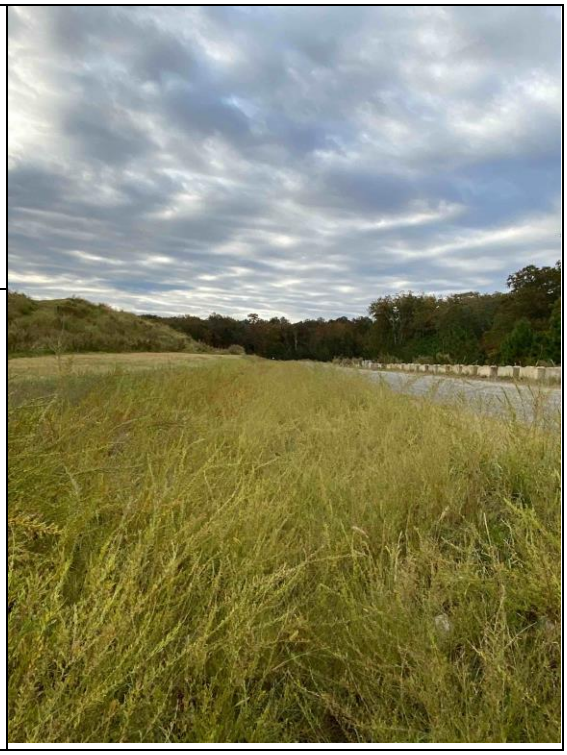
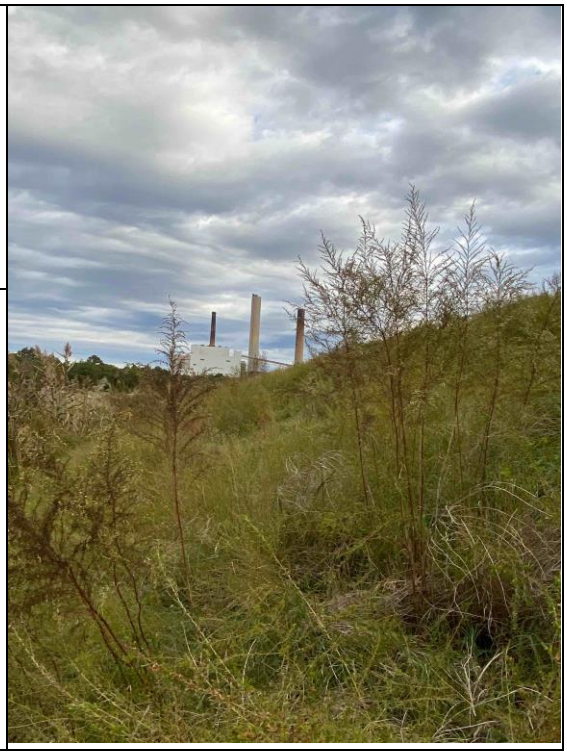


Image Number:	1103
Date:	October 18, 2022
Time:	7:50 AM
Direction:	North

Description: Outer side slope of Phase II, Cell 2. The side slope is well vegetated and maintained. No signs of vegetative stress, erosion, or geotechnical instability.



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SCS Engineers Project 25221158.00

Image Number:	1105
Date:	October 18, 2022
Time:	7:53 AM
Direction:	East-Northeast

Description: Perimeter ditch segment with dense, healthy vegetation. Erosion control functioning and in good condition. No signs of vegetative stress or erosion. Rock checks are used to slow water and minimize erosion.

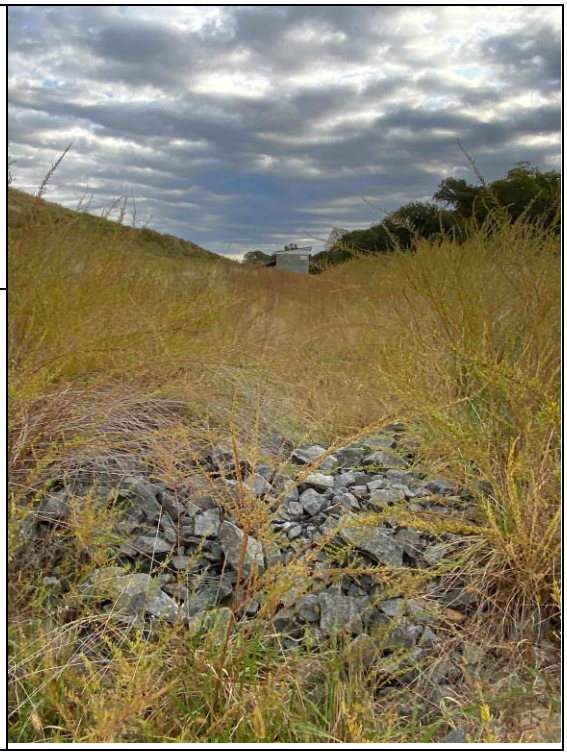

Image Number:	1111
Date:	October 18, 2022
Time:	7:56 AM
Direction:	Northeast

Description: Phase I, Cell 1 leachate pump house and storm water culvert. Building is appropriately marked (signage). Culvert is free of obstruction.

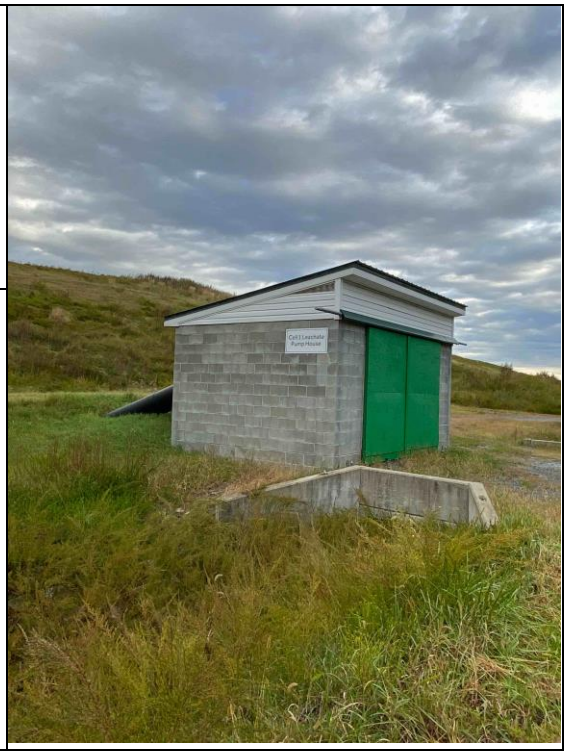

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Image Number:	1113
Date:	October 18, 2022
Time:	7:57 AM
Direction:	North

Description: Phase I, Cell 1 leachate liquid level indicator and controls in good working condition.

Image Number:	1115
Date:	October 18, 2022
Time:	7:58 AM
Direction:	Northwest

Description: Inside the Phase I, Cell 1 leachate pump house. Cleanout riser and pump risers with T-connections to forcemain are shown in this photograph. Building is well maintained.

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Image Number:	1117
Date:	October 18, 2022
Time:	7:58 AM
Direction:	East

Description: Perimeter landfill ditch segment and culvert underneath access roadway. Culvert and ditch segment are in good working condition with no obstructions. Vegetation density and growth is healthy.

Image Number:	1119
Date:	October 18, 2022
Time:	8:03 AM
Direction:	East-Northeast

Description: Terrace berm segment on the Phase I landfill side slope. Clear of obstructions and functioning as intended. Vegetative cover is dense and healthy.

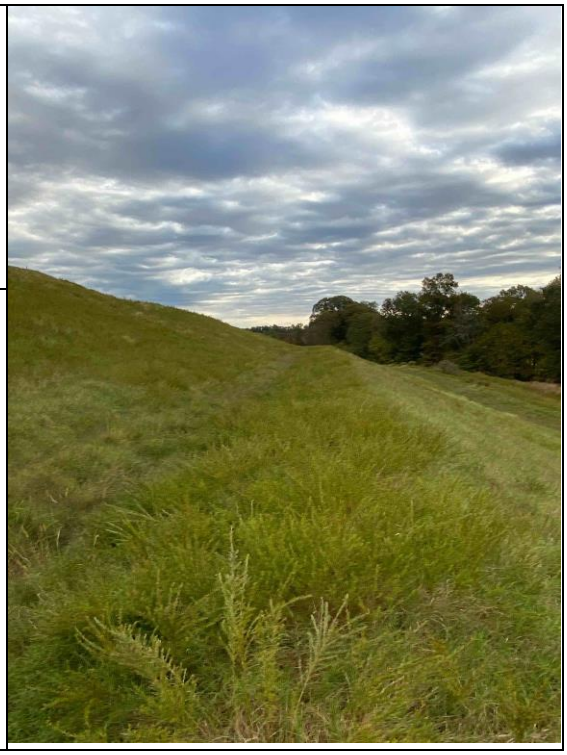

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Image Number:	1121
Date:	October 18, 2022
Time:	8:03 AM
Direction:	West-Southwest

Description: Final cover on side slopes of Phase II, Cell 1. Vegetation is healthy with full coverage. No signs of erosion or stability issues were observed.

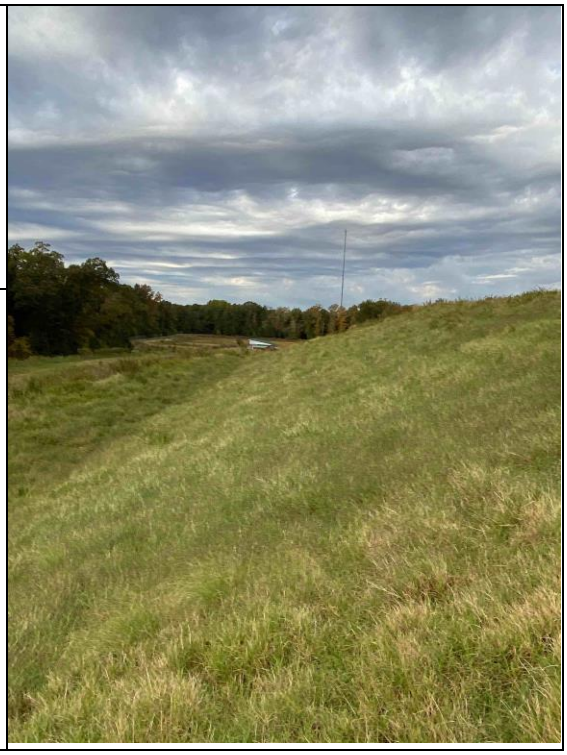

Image Number:	1125
Date:	October 18, 2022
Time:	8:06 AM
Direction:	Southeast

Description: Southeast Detention Basin forebay in good condition. Vegetation coverage is dense and healthy. No standing water was observed.

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Image Number:	1127
Date:	October 18, 2022
Time:	8:06 AM
Direction:	South

Description: Forebay berm within the Southeast Detention Basin in good condition. Vegetation coverage is dense and healthy.

Image Number:	1129
Date:	October 18, 2022
Time:	8:07 AM
Direction:	North-Northeast

Description: Inlet to Southeast Detention Basin forebay in good condition. Clear of obstruction at inlets and outlets.

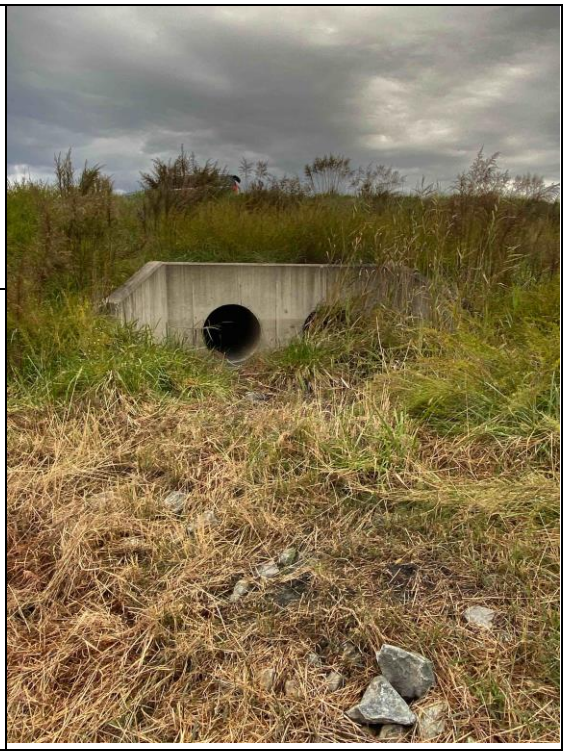

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Image Number:	1143
Date:	October 18, 2022
Time:	8:11 AM
Direction:	West-Southwest

Description: Southeast Detention Basin in good condition. Vegetation coverage is dense and healthy. No standing water was observed.

Image Number:	1193
Date:	October 18, 2022
Time:	8:34 AM
Direction:	South-Southeast

Description: Phase II, Cell 2 leachate pump house. Building exterior is in good condition. Building is appropriately marked (signage).

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Image Number:	1195
Date:	October 18, 2022
Time:	8:35 AM
Direction:	East

Description: Phase II, Cell 2 leachate liquid level indicator and controls in good working condition.

Image Number:	1197
Date:	October 18, 2022
Time:	8:35 AM
Direction:	South-Southeast

Description: Inside the Phase II, Cell 2 leachate pump house. Cleanout riser and pump risers with T-connections to forcemain are shown in this photograph. Building is well maintained.

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Image Number:	1201
Date:	October 18, 2022
Time:	8:38 AM
Direction:	East-Southeast

Description: Landfill side slopes and terrace are well maintained. No evidence of slope stability issues or erosion.

Image Number:	1271
Date:	October 18, 2022
Time:	9:10 AM
Direction:	North-Northeast

Description: Northeast Detention Basin outlet floating skimmer in good condition. No standing water in main basin area.

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Image Number:	1205
Date:	October 18, 2022
Time:	8:41 AM
Direction:	South

Description: Downchute near southwest forebay of the Northeast Detention Basin. Pipe and downchute are functioning appropriately, as intended.

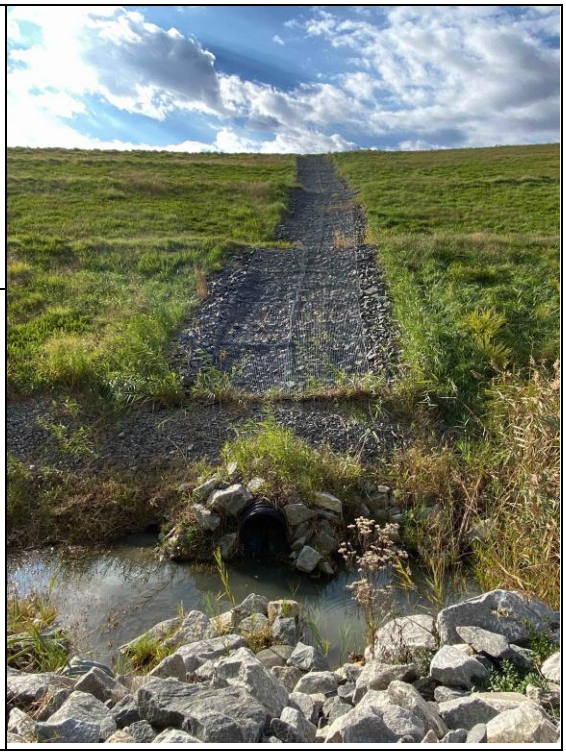

Image Number:	1207
Date:	October 18, 2022
Time:	8:43 AM
Direction:	West

Description: Phase I final cover and terrace berm. Vegetation coverage is dense and healthy.

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Image Number:	1211
Date:	October 18, 2022
Time:	8:44 AM
Direction:	North-Northeast

Description: Phase I corner downchute road crossing pipes inlets with grated covers. Free of obstructions and functioning.

Image Number:	1213
Date:	October 18, 2022
Time:	8:45 AM
Direction:	North-Northeast

Description: Phase I corner downchute road crossing pipe outlets into southeast forebay of the Northeast Detention Basin. No erosion was observed.

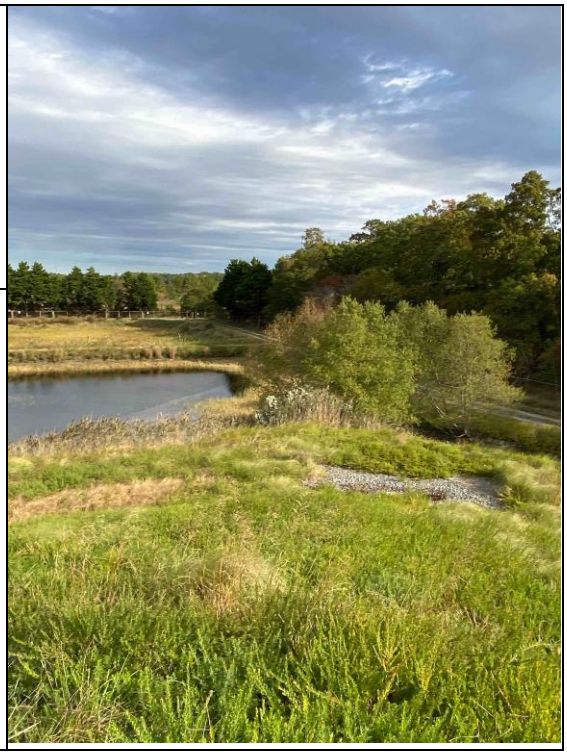

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Image Number:	1215
Date:	October 18, 2022
Time:	8:47 AM
Direction:	North

Description: Phase I final cover. Vegetation coverage is dense and healthy.

Image Number:	1217
Date:	October 18, 2022
Time:	8:48 AM
Direction:	South

Description: Phase I side slopes and terrace berm are well maintained. No evidence of slope stability issues or erosion.

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Image Number:	1219
Date:	October 18, 2022
Time:	8:50 AM
Direction:	Northwest

Description: Phase I downchute (background) sloped to downchute road crossing pipe inlets (foreground). Both features are in good working order.

Image Number:	1221
Date:	October 18, 2022
Time:	8:50 AM
Direction:	East-Southeast

Description: Phase I downchute appears to be functioning as intended. No signs of washout, erosion, or stability issues.

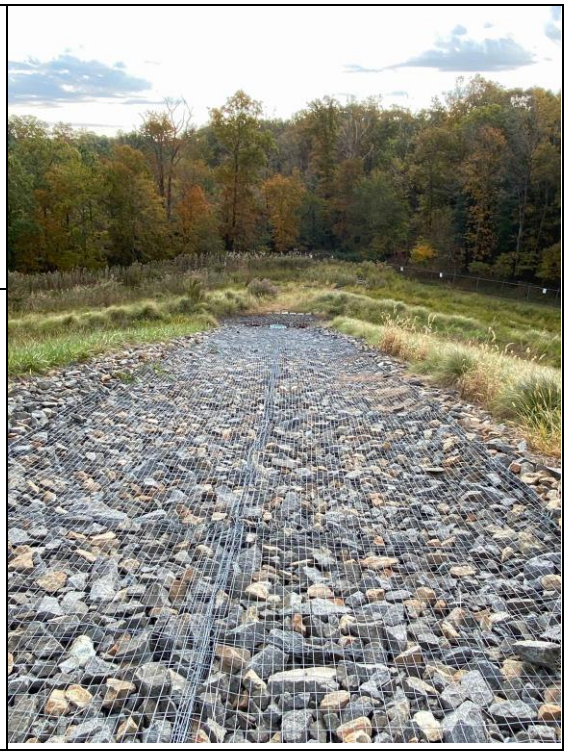

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Image Number:	1227
Date:	October 18, 2022
Time:	8:52 AM
Direction:	Southwest

Description: Phase I final cover. Vegetation coverage is dense and healthy.

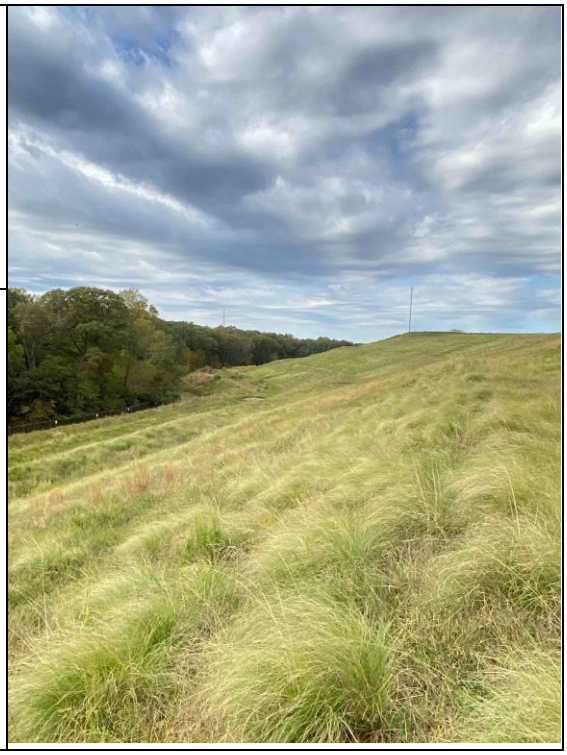

Image Number:	1229
Date:	October 18, 2022
Time:	8:53 AM
Direction:	North-Northwest

Description: Letdown pipe location from plateau terrace into access road ditch on Phase I final cover area. Free draining with no obstructions. No evidence of erosion or scour.

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Image Number:	1237
Date:	October 18, 2022
Time:	8:55 AM
Direction:	West-Northwest

Description: Phase II final cover plateau area. Vegetation coverage is dense and healthy.

Image Number:	1239
Date:	October 18, 2022
Time:	8:56 AM
Direction:	North-Northwest

Description: Overlooking Phase II, Cell 2 active area from Phase II, Cell 1 plateau.

Phase II final cover plateau. Vegetation is well established with no signs of erosion, sloughing, or animal burrows.

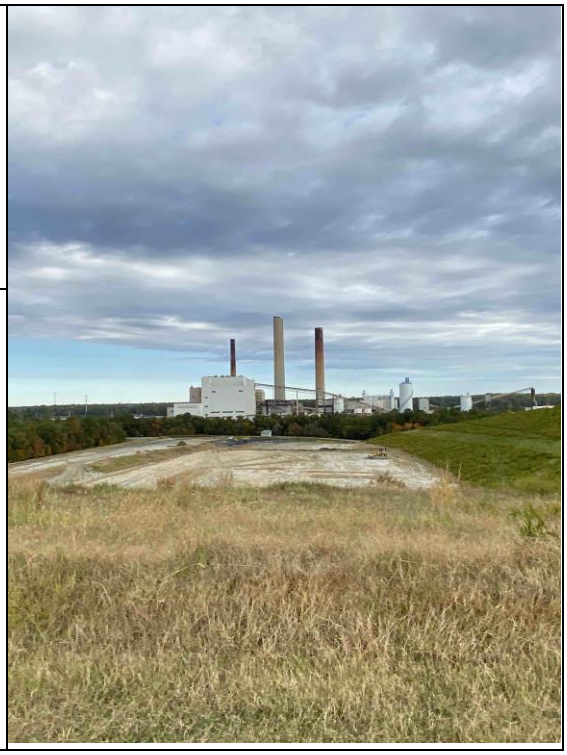

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Image Number:	1241
Date:	October 18, 2022
Time:	8:56 AM
Direction:	North-Northwest

Description: Vegetated side slope into active area. Vegetation coverage is dense and healthy.

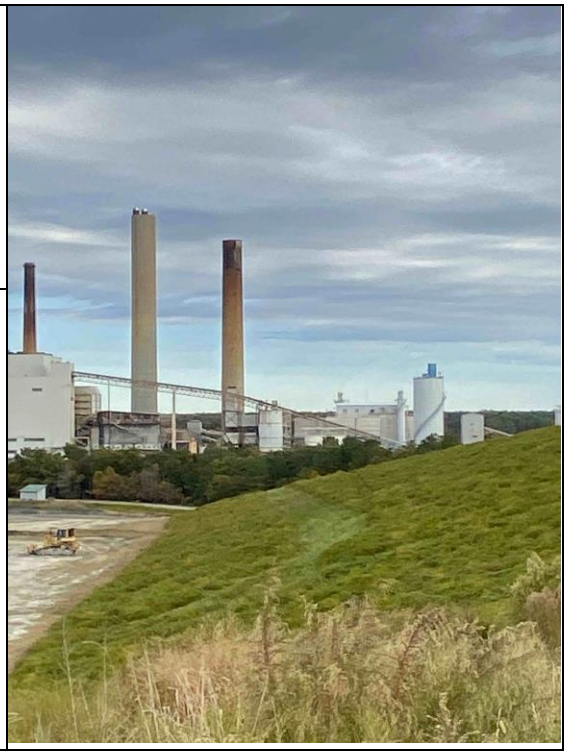

Image Number:	1245
Date:	October 18, 2022
Time:	8:58 AM
Direction:	North-Northeast

Description: Phase I final cover plateau area. Vegetation coverage is dense and healthy.

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Image Number:	1249
Date:	October 18, 2022
Time:	8:59 AM
Direction:	North-Northwest

Description: Phase I downchute pipe inlets with grated covers. Free of obstructions and functioning.

Image Number:	1251
Date:	October 18, 2022
Time:	9:00 AM
Direction:	North

Description: Phase I downchute downchute riprap. Free of obstructions and functioning. No signs of wash out or erosion.

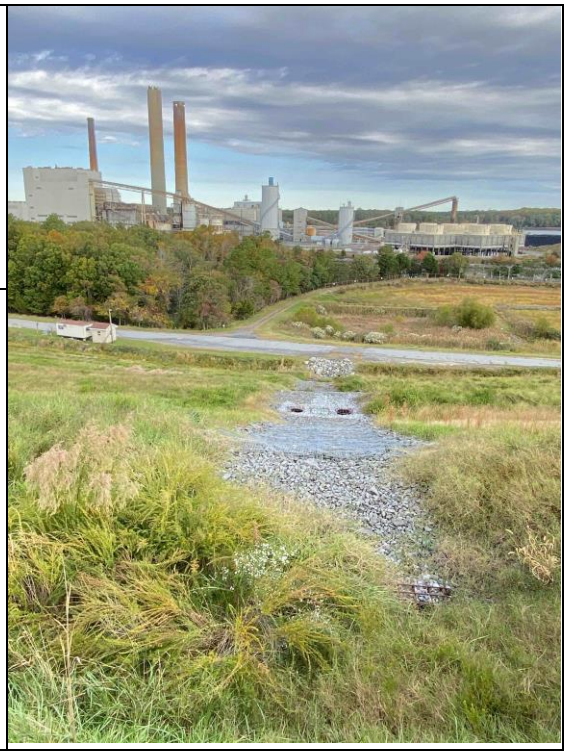

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Image Number:	1255
Date:	October 18, 2022
Time:	9:01 AM
Direction:	Northeast

Description: Phase I downchute pipe inlets with grated covers. Free of obstructions and functioning.

Image Number:	1261
Date:	October 18, 2022
Time:	9:03 AM
Direction:	East-Southeast

Description: Phase I downchute pipe inlets with grated covers. Free of obstructions and functioning.

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Image Number:	1263
Date:	October 18, 2022
Time:	9:03 AM
Direction:	East-Southeast

Description: Phase I downchute riprap. Free of obstructions and functioning. No signs of wash out or erosion.

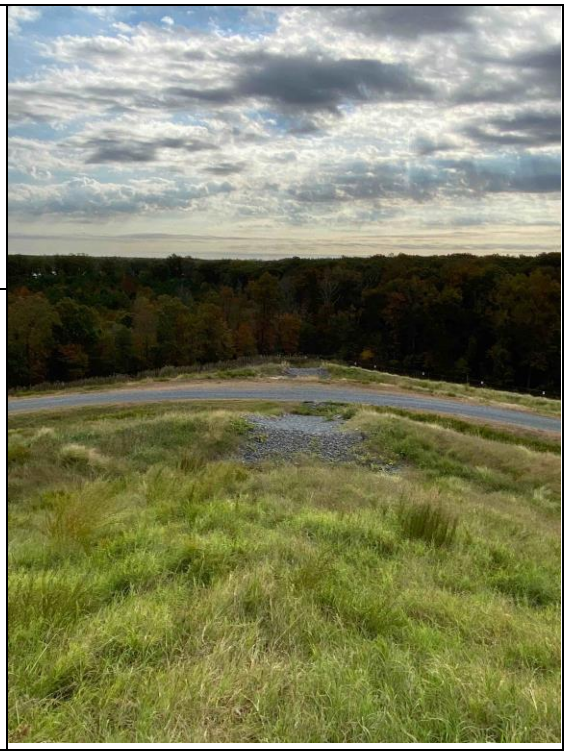

Image Number:	1265
Date:	October 18, 2022
Time:	9:05 AM
Direction:	West-Southwest

Description: Phase I final cover plateau area. Vegetation coverage is dense and healthy.