



**NRG TEXAS POWER LLC
W. A. PARISH GENERATING STATION, UNITS 5, 6, 7, & 8**

**ANNUAL INSPECTION OF CCR LANDFILL CELLS
SUPPORTING DOCUMENT**

S&L Project No.: 12661-073

Revision: 0

Date: January 12, 2018

Issue Purpose: Use

Prepared by



55 East Monroe Street
Chicago, IL 60603-5780 USA

312-269-2000

www.sargentlundy.com

LEGAL NOTICE

This report (“Report”) was prepared by Sargent & Lundy LLC (“S&L”), in accordance with the agreement between S&L and NRG Texas Power LLC (“Client”). This Report was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this Report subject to the particular scope limitations, budgetary and time constraints, and business objectives of the Client; (2) information and data provided by others may not have been independently verified by S&L; and (3) the information and data contained in this Report are time sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Report. Any use or reliance upon this Report by third parties shall be at their sole risk.

NRG TEXAS POWER LLC

W. A. PARISH GENERATING STATION, UNITS 5, 6, 7, & 8

ANNUAL INSPECTION OF CCR LANDFILL CELLS
SUPPORTING DOCUMENT

ISSUE SUMMARY AND APPROVAL PAGE

This is to certify that this document has been prepared, reviewed and approved in accordance with Sargent & Lundy's Standard Operating Procedure SOP-0405, which is based on ANSI/ISO/ASSQC Q9001 Quality Management Systems.

Prepared by:



January 12, 2018

David E. Nielson
Sr. Geotechnical Consultant

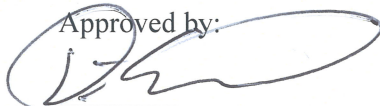
Reviewed by:



JANUARY 12, 2018

Daniel C. Kocunik
Geotechnical Discipline Manager

Approved by:



January 17, 2018

Brian A. Faga *By David Nielson*
Project Manager *with permission*

NRG TEXAS POWER LLC

WA PARISH GENERATING STATION, UNITS 5, 6, 7, & 8

SUPPORTING DOCUMENT FOR
ANNUAL INSPECTION OF CCR LANDFILL CELLS

CERTIFICATION PAGE

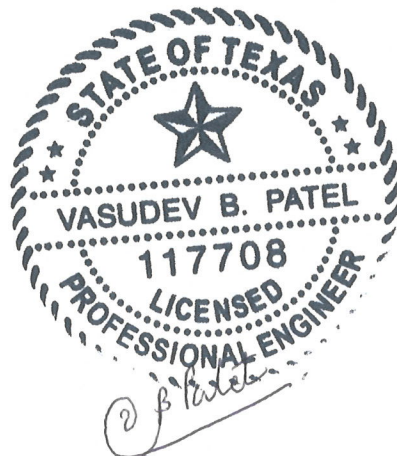
I certify that this document was prepared by me or under my direct supervision and that I am a registered professional engineer under the laws of the State of Texas.

This document is released for client use under the authority of Vasudev B. Patel, Texas PE #117708 on January 12, 2018. Sargent & Lundy LLC Texas Registered Engineering Firm # F-2202.

Certified By: _____
Vasudev B. Patel, P.E.

Date: 1/12/18

Seal:





<u>Table of Contents</u>		<u>Page</u>
1	EXECUTIVE SUMMARY.....	1
2	INTRODUCTION	2
3	PURPOSE/OBJECTIVE.....	2
4	SCOPE OF WORK	2
5	ASSUMPTIONS/INPUTS	3
6	CCR LANDFILL DESIGN & BACKGROUND	3
6.1	LANDFILL CELL 3	3
6.2	LANDFILL CELL 2A	3
6.3	LANDFILL CELL 1C	4
6.4	LANDFILL CELL 2B	4
7	CCR LANDFILL INSPECTION OBSERVATIONS & FINDINGS	5
7.1	LANDFILL CELL 3	5
7.2	LANDFILL CELL 2A	5
7.3	LANDFILL CELL 1C	6
7.4	LANDFILL CELL 2B	6
8	REVIEW OF WEEKLY INSPECTIONS	7
9	REVIEW OF CCR INVENTORY	7
10	MAINTENANCE RECOMMENDATIONS	7
11	CRITERIA.....	7
12	LIMITATIONS	7
13	REFERENCES	8
14	CONCLUSIONS	8
	FIGURES.....	9
	APPENDIX A – SITE PHOTOGRAPHS.....	11

1 EXECUTIVE SUMMARY

On November 9, 2017, Sargent & Lundy LLC (S&L) inspected the CCR landfill at the W. A. Parish Station, near Thompsons, Texas. Specifically, this work was performed to satisfy the requirement for an Annual Inspection by a qualified professional engineer, as required by 40 CFR Part 257, the US Environmental Protection Agency rule on Disposal of Coal Combustion Residuals From Electric Utilities, which is referred to herein as the Federal CCR Rule.

The applicable CCR landfill cells were visually inspected by Mr. Vasudev Patel, P.E. (Licensed in TX and WI) and Mr. David Nielson, P.E. (Licensed in IN, IL, MI, NV, and WA). The inspection included performing a visual inspection of the applicable landfill cells to identify areas requiring maintenance and showing signs of distress or malfunction of the CCR landfill cells. S&L also reviewed the available documentation related to the CCR landfill cells at the W. A. Parish Station.

This inspection evaluated:

- Landfill Cell 3,
- Landfill Cell 2A,
- Landfill Cell 1C, and
- Landfill Cell 2B.

Considering the significant rainfall associated with Hurricane Harvey and the good to excellent condition the landfill facilities were found, it is evident that the ongoing inspection and maintenance activities at the W. A. Parish Generating Station are very effective.

S&L did not observe any evidence of ongoing or imminent failure of these landfill cells. There were no structural deficiencies noted based on S&L's observations.

Since the Federal CCR Rule does not apply to landfills that no longer receive CCR materials after October 19, 2015, closed landfill cells (Cells 1, 1A, 1B, and 2, which are not shown on Figure 1 for clarity) were not inspected during this work.

As discussed in Section 10 of this report, the ongoing maintenance efforts to promote grass vegetation and mitigate damage from feral hogs should continue. No other maintenance items were identified in this annual inspection.

Based on a review of available documents and the visual inspection, it is S&L's opinion that Landfill Cells 3, 2A, 1C and 2B have been designed, constructed, are currently operated, and are maintained in a manner that is consistent with and in accordance with recognized and generally accepted good engineering standards.

2 INTRODUCTION

This document presents the observations and findings of the third annual inspection at the W. A. Parish Generating Station. The W. A. Parish Generating Station is located near Thompsons, Texas, in Fort Bend County. The power station is owned and operated by NRG Texas Power LLC.

The station includes 4 coal fired generating units with a total gross rated capacity of 2667 MW from the coal fired units. The station is fueled by coal imported from the Powder River Basin in Wyoming.

The general arrangement of the station and active landfill is depicted in Figure 1.

3 PURPOSE/OBJECTIVE

This document is prepared to provide compliance with the annual inspection requirements for CCR units as required by 40 CFR Part 257, the US Environmental Protection Agency rule on Disposal of Coal Combustion Residuals From Electric Utilities (Reference 1). Specifically, Section 257.84(b) of the Federal CCR Rule pertains to the annual inspection requirements for CCR landfills.

4 SCOPE OF WORK

This document reports the annual inspection by a qualified professional engineer for all existing landfills (landfills that receive CCR material after October 19, 2015).

This work includes:

- Annual inspections by a qualified professional engineer to evaluate if the design, construction, operation, and maintenance of the CCR units are consistent with recognized and generally accepted good engineering standards.
- 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 the results of “weekly” inspections by a qualified person;
- A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures.
- Preparation of this inspection report, as required by the CCR Rule, addresses the following:
 - Any changes in geometry of the CCR units since the previous annual inspection;
 - The approximate volume of CCR contained in the units at the time of inspection;
 - Any appearances of actual or potential structural weaknesses of the CCR units, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR units and appurtenant structures; and
 - Any other change(s) which may have affected the stability or operation of the CCR units since the previous annual inspection.

5 ASSUMPTIONS/INPUTS

There are no assumptions that require verification for this work.

NRG provided prior reports and design drawings as inputs to this inspection.

6 CCR LANDFILL DESIGN & BACKGROUND

The following CCR units are considered in this annual inspection:

- Landfill Cell 3,
- Landfill Cell 2A,
- Landfill Cell 1C, and
- Landfill Cell 2B.

The following paragraphs summarize the design and construction of these CCR units and evaluate the applicability of the Federal CCR Rule to each CCR unit.

6.1 LANDFILL CELL 3

Landfill Cell 3 receives bottom ash, which is trucked from the plant. The landfill is constructed over a significant deposit of in situ clay soils. Storm water is directed to an incised storm water collection pond in the western portion of Cell 3. The storm water outlet from this pond is pumped on an as-needed basis to provide cooling and other water for the plant. Generally, the cell is constructed of berms with the exterior slope vegetated and the inside slope and crest surfaced with stabilized CCR material to control vegetation and act as an erosion protection layer.

Landfill Cell 3 is designed as a Class 2 non-hazardous landfill under criteria of the Texas Commission on Environmental Quality (TCEQ) (Reference 2).

Since Landfill Cell 3 is an active landfill, an annual inspection is required as documented in subsequent sections of this document.

6.2 LANDFILL CELL 2A

Landfill Cell 2A is a small active portion of Cell 2, which has been closed. This open portion of Cell 2A is an active pugmill operation for mixing and stabilizing CCR material for disposal in other landfill cells or for beneficial use outside the landfill cells. The landfill is constructed over a significant deposit of in situ clay soils. Storm water is directed to the southwestern portion of Cell 2A, where it enters a sump and is pumped into an above ground water storage tank for the pugmill process. Generally, the cell is constructed of berms with the exterior slope vegetated and the inside slope and crest surfaced with stabilized CCR material to control vegetation and act as an erosion protection layer.

Landfill Cell 2A is designed as a Class 2 non-hazardous landfill under criteria of the TCEQ.

Since Landfill Cell 2A is an active landfill, an annual inspection is required as documented in subsequent sections of this document.

6.3 LANDFILL CELL 1C

Landfill Cell 1C receives nonmarketable CCR materials, which are trucked from the plant. The landfill is constructed over a significant deposit of in situ clay soils. Storm water is directed to an incised storm water collection pond in the western portion of Cell 1C. The storm water outlet from this pond is pumped on an as-needed basis to provide cooling and other water for the plant. Generally, the cell is constructed of berms with the exterior slope vegetated and the inside slope and crest surfaced with stabilized CCR material to control vegetation and act as an erosion protection layer.

Landfill Cell 1C is designed as a Class 2 non-hazardous landfill under criteria of the TCEQ.

Since Landfill Cell 1C is an active landfill, an annual inspection is required as documented in subsequent sections of this document.

6.4 LANDFILL CELL 2B

Landfill Cell 2B receives marketable CCR materials, which are trucked from the plant. The landfill is constructed over a significant deposit of in situ clay soils. Storm water is directed to an incised storm water collection pond in the southern portion of Cell 2B. The storm water outlet from this pond is pumped on an as-needed basis to provide cooling and other water for the plant. Generally, the cell is constructed of berms with the exterior slope vegetated and the inside slope and crest surfaced with stabilized CCR material to control vegetation and act as an erosion protection layer.

Landfill Cell 2B is designed as a Class 2 non-hazardous landfill under criteria of the TCEQ.

Since Landfill Cell 2B is an active landfill, an annual inspection is required as documented in subsequent sections of this document.

7 CCR LANDFILL INSPECTION OBSERVATIONS & FINDINGS

On November 9, 2017, Mr. Vasudev Patel, PE (TX, WI) and Mr. David Nielson, PE (WA, IN, MI, IL, NV) of S&L along with Rick Brown, PE of NRG, visually inspected the CCR landfill cells (CCR units) at the W. A. Parish Generating Station. This visual inspection was performed to evaluate if the design, construction, operation, and maintenance of each applicable CCR unit is consistent with recognized and generally accepted good engineering standards.

7.1 LANDFILL CELL 3

The location and general arrangement of Landfill Cell 3 are depicted on Figure 1 and also Photograph P-1, both of which were obtained from Google Earth Pro®.

Landfill Cell 3 consists of an active marketable bottom ash storage area and an incised storm water detention pond (approximately 5 acres), located within the perimeter berm in the western portion of the landfill cell.

At the time of the inspection, the water level in the storm water pond was lower than the ground surface outside the western and southern berms of the pond. Thus, lateral pressure from the retained water on the landfill berms was minimal.

The berms (intended to retain CCR material and control the incised pond) are shown in Photographs P-2 through P-11. In general, the exterior slopes of the berms are well vegetated and demonstrate good alignment and slope grade. In general, the interior slopes of the berms and the berm crest are surfaced with stabilized CCR material that resists erosion.

The crest of the berms around Cell 3 are free of rutting and misalignment.

Landfill Cell 3 was found to be in good condition as observed without indications of risk of catastrophic or operational failure. The repairs made since the prior annual inspection have improved the condition of the landfill containment dikes and berms, which are considered to be in excellent condition.

7.2 LANDFILL CELL 2A

The location and general arrangement of Landfill Cell 2A are depicted on Figure 1 and also Photograph P-12, which were both obtained from Google Earth Pro®.

At the time of the S&L inspection, Landfill Cell 2A was not used to store or dispose of significant quantities of CCR material. Moreover, mixing ash products for stabilization was not in progress during the inspection. Since the cell did not contain significant CCR materials and since it appears the CCR contained within Cell 2A is stable and rigid as shown in Photograph P-21, the lateral loads on the perimeter berms are considered to be minimal.

The berms are shown in Photographs P-13 through P-20 and P-22. In general, the exterior slopes of the berms are well vegetated and demonstrate good alignment and slope grade. Portions of the interior slopes

were well vegetated and other areas of the interior slopes of the berms and the berm crest are surfaced with stabilized CCR material that resists erosion.

Landfill Cell 2A was found to be in excellent condition as observed, without indications of risk of catastrophic or operational failure.

7.3 LANDFILL CELL 1C

The location and general arrangement of Landfill Cell 1C are depicted on Figure 1 and also Photograph P-23, which were both obtained from Google Earth Pro®.

At the time of the S&L inspection, Landfill Cell 1C was used to store or dispose nonmarketable CCR material. Given the volume of CCR material stored in the cell, the only area where inside berms were observable was in the vicinity of the incised storm water pond in the southwest portion of the cell.

The inside slopes of the perimeter berms are shown in Photographs P-26, and P-27. These slopes typically exhibited good alignment, grades and vegetation or erosion resistant stabilized CCR material. No adverse conditions were identified for the inside slopes of the perimeter berms.

The outside slopes of the perimeter berms are shown in Photographs P-25, P-28, P-31, and P-33. These slopes typically exhibited good alignment and grades. No significant adverse conditions were identified for the outside slopes of the perimeter berm.

The crest of the berms around Cell 1C are generally free of rutting and misalignment as shown in Photographs P-24, P-25, P-29, P-30, and P-32.

Landfill Cell 1C was found to be in good condition as observed, without indications of risk of catastrophic or operational failure and is considered to be in excellent condition.

7.4 LANDFILL CELL 2B

The location and general arrangement of the Landfill Cell 2B are depicted on Figure 1 and also Photograph P-34, which were both obtained from Google Earth Pro®.

An incised storm water pond is located in the southern portion of the cell.

The outside slopes of the perimeter berms are shown in Photographs P-37, P-42, P-44, P-47, and P-52. These slopes typically exhibited good alignment, grades and vegetation. There were no observed indications of instability of the outside slopes of the perimeter berms and dikes.

The crest of the berms and dikes around Cell 2B are generally free of rutting and misalignment as shown in Photographs P-36, P-38, P-41, and P-51. The berm crest and roadway surface are well maintained and considered to be in good to excellent condition.

The inside slopes of the perimeter dikes and berms around Cell 2B are shown in Photographs P-35, P-38, P-39, P-40, P-43, P-45, P-46, and P-49. These slopes as well as the berm crest are surfaced with stabilized CCR material to prevent erosion. Photograph P-50 is a close up of an area where the stabilized

CCR material effectively stopped the erosion of the berm face. In general, these slopes were well graded and uniform in slope.

Landfill Cell 2B was found to be in excellent condition as observed, without indications of risk of imminent catastrophic or operational failure.

8 REVIEW OF WEEKLY INSPECTIONS

The weekly inspections by a qualified person (by NRG) have been performed and S&L has reviewed the reports. The inspections appear to be thorough and appropriately executed.

9 REVIEW OF CCR INVENTORY

As required by the Federal CCR Rule, the approximate volume of stored CCR in the landfill, as provided by NRG, is:

- Cell 1C: Approximately 334 thousand cubic yards,
- Cell 2A: Approximately 371 thousand cubic yards,
- Cell 2B: Approximately 0 cubic yards, and
- Cell 3: Approximately 414 thousand cubic yards.

10 MAINTENANCE RECOMMENDATIONS

At the time of this inspection, there are no repairs needed that pose immediate operational or safety concerns for the CCR units inspected. Based on the observations made by S&L on November 9, 2017, S&L recommends that the prior maintenance practices such as control of vegetation, feral hogs and repair of minor erosion areas before they become significant be continued.

11 CRITERIA

This inspection been performed in accordance with the inspection requirements of the Federal CCR Rule (Reference 1) and generally accepted engineering practice. The TCEQ Guidelines for Operation and Maintenance of Dams in Texas (Reference 2) is considered to represent generally accepted practices and is considered to be an applicable criterion.

12 LIMITATIONS

Given the visual nature of this inspection, it must be recognized that latent conditions may be present that are not visually evident.

Given the work in progress nature of active pond and landfilling operations, this document only considers the conditions present at the time of the S&L field inspection.

13 REFERENCES

- 1) 40 CFR Part 257, Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule, April 17, 2015.
- 2) Texas Commission on Environmental Quality, Guidelines for Operation and Maintenance of Dams in Texas, November 2006.

14 CONCLUSIONS

This annual inspection considered the following CCR Units:

- Landfill Cell 3,
- Landfill Cell 2A,
- Landfill Cell 1C, and
- Landfill Cell 2B.

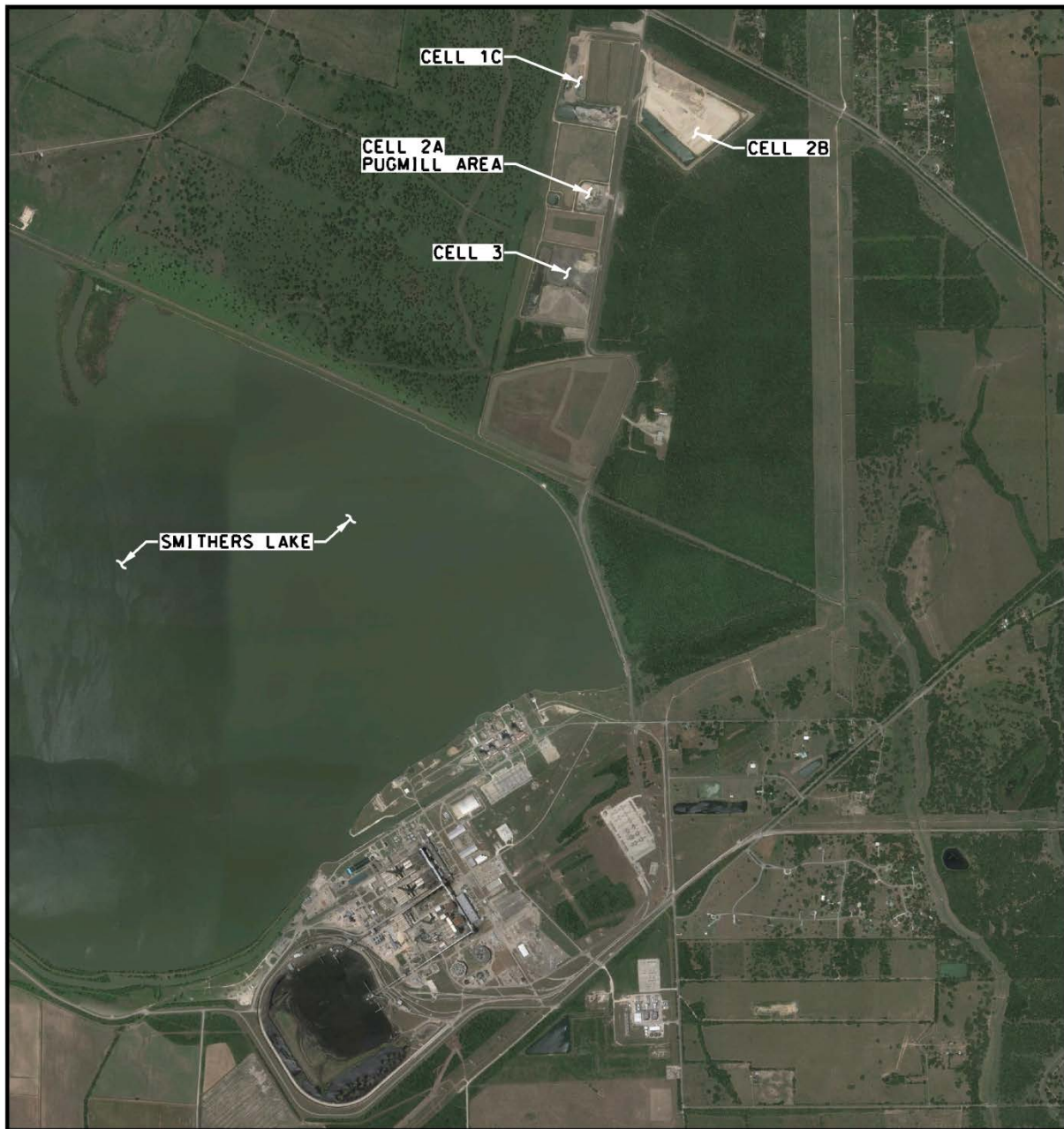
S&L did not identify any evidence of ongoing or imminent failure of the landfill cells. No structural deficiencies were noted based on S&L's observations.

Based on the review of available documents and the visual inspection, it is S&L's opinion that Landfill Cell 3, Landfill Cell 2A, Landfill Cell 1C and Landfill Cell 2B have been designed, constructed, are currently operated, and are maintained in a manner that is consistent with recognized and generally accepted good engineering standards.

Considering the significant rainfall associated with Hurricane Harvey and the good to excellent condition the landfill facilities were found, it is evident that the ongoing inspection and maintenance activities at the W. A. Parish Generating Station are very effective.

As discussed in Section 10, the ongoing maintenance efforts to promote grass vegetation and mitigate damage from feral hogs should continue. No other maintenance items were identified in this annual inspection.

FIGURES



NOTES

1. AERIAL IMAGE SHOWN ON THIS DRAWING
OBTAINED USING GOOGLE EARTH PRO v6.2.

WA PARISH STATION - FIGURE 1
GENERAL ARRANGEMENT OF
CCR LANDFILL CELLS
12/22/2016 REV: A



APPENDIX A – SITE PHOTOGRAPHS



Photograph P-1 – From Google Earth Pro, dated October 28, 2017.
Downloaded December 26, 2017.
Landfill Cell 3: Aerial view of landfill cell and
storm water runoff pond inside western edge of cell.





Photograph P-2 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking west along the crest and outside slope of the south landfill berm.
Note the well-established vegetation.



Photograph P-3 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking west along the crest and outside slope of the south landfill berm
Note the good vegetation.



Photograph P-4 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking north along the west berm adjacent to the incised storm water pond in Cell 3.



Photograph P-5 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking north along the outside slope of the western berm of landfill cell in vicinity of incised storm water pond.



Photograph P-6 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking south along outside slope of western berm of landfill in vicinity of the incised storm water pond.
Note good vegetation.



Photograph P-7 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking south along crest of the western berm of the landfill cell in vicinity of incised storm water pond.



Photograph P-8 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking south along inside slope of western berm of landfill cell in vicinity of incised storm water pond. Note this area that does not support vegetation is surfaced with stabilized material to control erosion. Also see Photograph 50.



Photograph P-9 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking east along inside slope of northern edge of pond, and at the interface of the ash storage area and the storm water pond, which is incised.



Photograph P-10 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking west along inside slope of northern berm of the landfill.
Note the good vegetation.



Photograph P-11 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 3: Looking west along the outside slope of the northern landfill berm.



Photograph P-12 – From Google Earth Pro, dated October 28, 2017.
Downloaded December 26, 2017.

Landfill Cell 2A: Aerial view of open area of cell,
which contains a pugmill to stabilize CCR materials for disposal in other cells.
The closed portions of Cell 2A are north and west of the active area.





Photograph P-13 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking east along the inside slope of the southern berm.
This berm abuts closed Cell 1B, which is higher in elevation.
Note well established grass and uniformity of slope.



Photograph P-14 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking east along the crest and outside slope of southern dike.



Photograph P-15 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking north along the crest of the western berm.



Photograph P-16 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking north along the outside slope and crest of the western berm.



Photograph P-17 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking south along the inside slope of western berm.



Photograph P-18 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking south along the outside slope of the western berm.



Photograph P-19 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking east along the inside slope of northern berm.



Photograph P-20 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking east at outside slope of the northern berm.



Photograph P-21 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking south into the active portion of Cell 2A along a vertical wall ditch cut in the stabilized material that has cured in place. These vertical walls demonstrate the long-term properties of these stabilized CCR materials.



Photograph P-22 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2A: Looking south along the outside slope of the eastern berm.



Photograph P-23 – From Google Earth Pro, dated October 28, 2017.

Downloaded December 26, 2017.

Landfill Cell 1C: Aerial view of landfill cell and storm water runoff pond inside the cell.
Note closed cells north and east of active cell area.





Photograph P-24 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking west along the crest of the southern berm of the cell with a view of
the incised storm water pond.



Photograph P-25 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking west along the outside slope of the southern berm
of the landfill cell.



Photograph P-26 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking north along the inside slope of the western landfill berm at the incised storm water pond.



Photograph P-27 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking south along the inside slope of the western landfill cell berm.



Photograph P-28 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking north along outside slope of western berm of the landfill cell.



Photograph P-29 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking north along the crest of the western berm.
Note good vegetation control and road condition.



Photograph P-30 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking south along the crest of the western berm.



Photograph P-31 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking south along the outside slope of the western berm.
Note good vegetation control.



Photograph P-32 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking east along the crest of slope of the northern berm.



Photograph P-33 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 1C: Looking east along the outside slope of the northern berm.



Photograph P-34 – From Google Earth Pro, dated October 28, 2017.
Downloaded December 26, 2017.
Landfill Cell 2B: Aerial view of landfill cell and storm water runoff pond inside the cell.





Photograph P-35 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking north along the inside slope of the western berm
at the area where a mobile pump is placed to remove storm water collected in incised storm
water pond located within the cell. Note the slope has been regraded with stabilized material to
reduce future erosion. See Photograph 50.



Photograph P-36 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking north along crest of western berm.



Photograph P-37 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking north along outside slope of western berm.
Note good vegetation cover and uniform slope.



Photograph P-38 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking west along the crest of the northern berm and the soil stockpile
(north of berm).



Photograph P-39 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking west along the inside slope of the northern berm.



Photograph P-40 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking south along the inside slope of the eastern berm.



Photograph P-41 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking south along the crest of the eastern berm.



Photograph P-42 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking south along the toe of the
outside slope of the eastern berm.



Photograph P-43 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking south along the inside slope of the eastern landfill berm.



Photograph P-44 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking south along the
outside slope of the eastern berm.



Photograph P-45 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking north along the inside slope of the eastern berm.



Photograph P-46– Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking west along inside slope of southern berm.



Photograph P-47 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking west along the outside slope of the southern landfill berm.
Note good vegetation.



Photograph P-48 – Taken November 9, 2017 by David E. Nielson.
Landfill Cell 2B: Looking east along the crest of southern berm.



Photograph P-49 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking east along inside slope of southern berm.



Photograph P-50 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking down at inside slope of landfill berm. Close up view of stabilized material that has stopped apparent erosion.



Photograph P-51 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking east along crest of the southern berm.



Photograph P-52 – Taken November 9, 2017 by David E. Nielson
Landfill Cell 2B: Looking east along outside slope of southern berm.