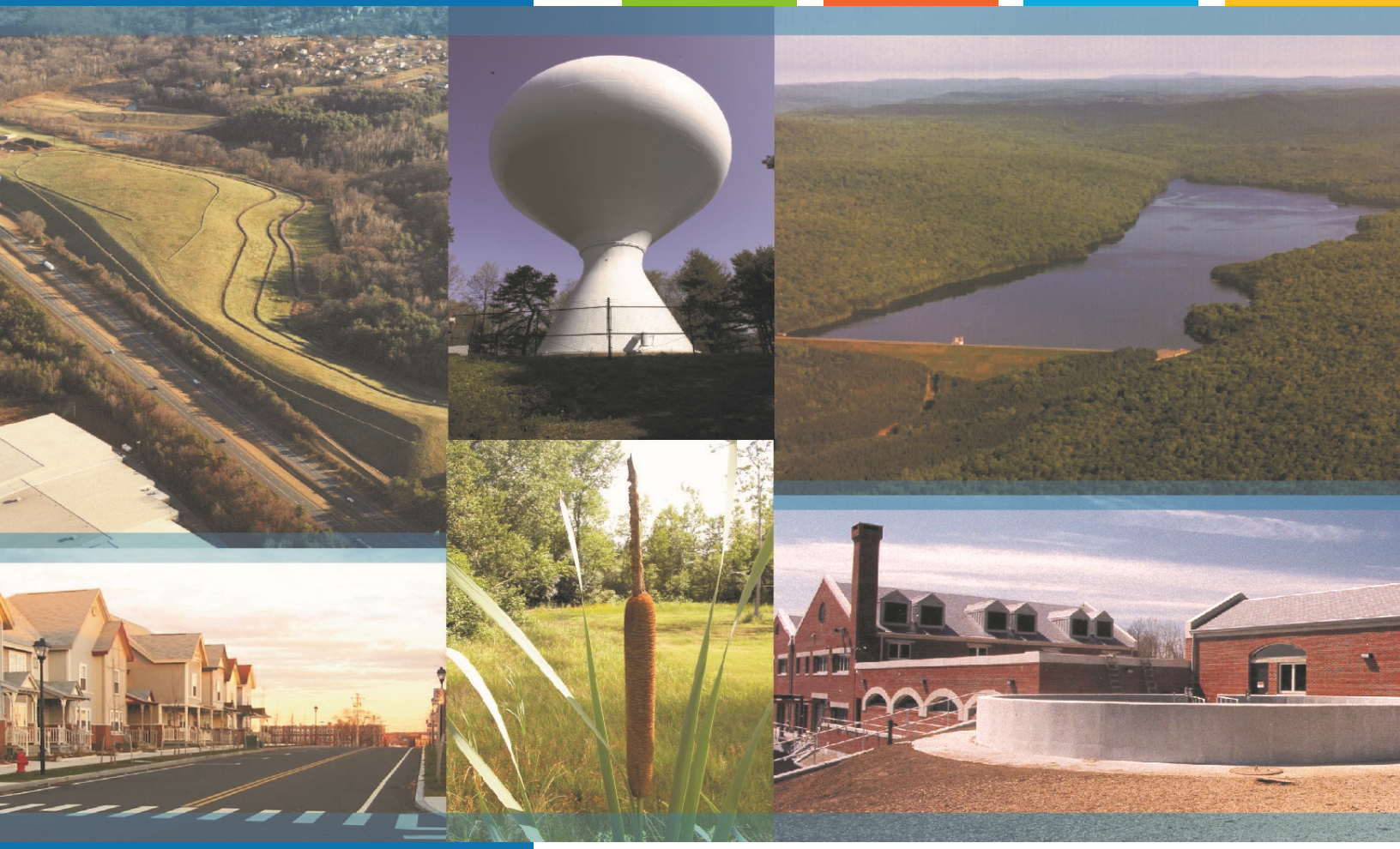

Mt. Tom Generating Company Facility
200 Northampton Street, Holyoke

Coal Combustion Residuals Legacy Surface Impoundments- Initial Annual Inspection Report

Prepared for ENGIE North America, Inc.

August 2025

Tighe&Bond

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Preface

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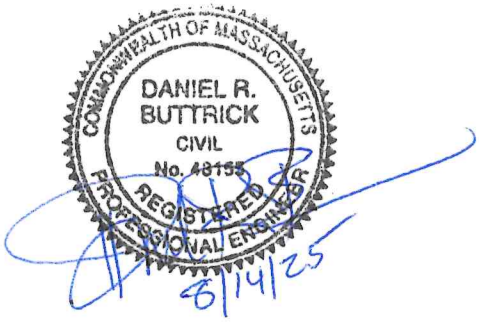
Preface

The assessment of the general condition of the Coal Combustion Residuals Legacy Surface Impoundments (LSIs or units) reported herein was based upon available data and visual inspections. Detailed investigations and analyses involving topographic mapping, subsurface investigations, testing and detailed computational evaluations were beyond the scope of this report unless noted otherwise.

In reviewing this report, it should be realized that the reported condition of the units was based on observations of field conditions at the time of inspection, along with data available to the inspection team.

It is critical to note that the condition of the units depends on numerous and constantly changing internal and external conditions and is dynamic in nature. It would be incorrect to assume that the reported condition of the units will continue to represent the condition of the units at some point in the future. Only through continued care and inspection can there be any chance that unsafe conditions are detected.



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Section 1
Description of Project

1.1 General

1.1.1 Authority

Mt. Tom Generating Company LLC ("MTGC"), a wholly owned indirect subsidiary of ENGIE North America Inc., retained Tighe & Bond, Inc. ("Tighe & Bond") to perform an annual visual inspection and prepare a report of the observed conditions at the two Coal Combustion Residuals ("CCR") Legacy Surface Impoundments ("LSIs") at the former MTGC facility, located at 200 Northampton Street in Holyoke, Massachusetts (the "site"). 40 CFR 257 ("CCR rule") requires that owners/operators of CCR LSIs perform their first annual inspection by February 10, 2025. This initial annual inspection was performed to fulfill the Operating Criteria requirements of 40 CFR 257.83. A field inspection form for use in preparing subsequent reports is presented in Appendix C.

1.1.2 Purpose of Work

The purpose of this investigation was to inspect and evaluate the present status of the Special Basin and Bottom Ash Basin A ("Basin A"), which are unused and functionally decommissioned CCR LSIs. This is the first annual inspection, so this report is intended to serve as a baseline for subsequent annual inspections. One other basin on the site, the Sedimentation Basin, is not included in this report because it was not designed to hold or treat CCR.

The investigation is divided into three sections 1) present background information on the CCR LSIs; 2) present the results of a visual inspection of the CCR LSIs; and 3) summarize observations.

1.1.3 Figures

Figures were created for this report to aid the reader in understanding the site, its features, and the surrounding area. Figure 1 presents a topographic image showing the site locus and downstream area. Figure 2 presents an aerial overview of the site.

1.2 Description of Project/Review of Available Information (257.83(b)(1)(i))

1.2.1 Location

The former coal-fired electrical generating MTGC station is located at 200 Northampton Street ("Route 5") in Holyoke, Hampden County, Massachusetts. The former facility comprises approximately 143 acres and is located adjacent to the western bank of the Connecticut River, where the river forms the eastern site boundary. Route 5 abuts the site to the west, with a railroad corridor that parallels the roadway immediately to the east.

The former station was operational through 2014, when it was permanently shut down. From 2014 through 2022, the facility underwent closure through plant demolition, environmental assessment, remediation, and ecological restoration in accordance with the 2018 Massachusetts Department of Environmental Protection ("MassDEP") Administrative

Consent Order ("ACO"), ACO-00002589, under MassDEP Release Tracking Number (RTN) 1-20229.

The facility generally consists of vegetated land, including mature, forested areas. The only remaining aboveground structure is an electrical substation located to the east of the former generation plant building, which is operated by Eversource Energy ("Eversource"). Additionally, overhead electrical distribution lines, owned and operated by South Hadley Electric Light Department, are present at the site. Transmission lines owned by Eversource run along the eastern portion of the site. On-going activities across the site include periodic inspections to verify that site conditions are consistent with the 2022 Activity and Use Limitation ("AUL"), which was implemented as part of the Temporary Solution in accordance with the Massachusetts Contingency Plan ("MCP"). Additional site history has been provided in previous MassDEP regulatory submittals, which can be reviewed online at https://eeaonline.eea.state.ma.us/EEA/fileviewer/Rtn.aspx?rtn=1-0020229.

The former MTGC station includes two CCR LSIs located on the eastern portion of the site adjacent to the Connecticut River. These units are identified as Basin A and the Special Basin. See Figures 1 and 2 in the Figures section of this report for the USGS Site Location Map and Orthophoto Site Plan, respectively.

1.2.2 Owner/Caretaker

The CCR LSIs are owned by Mt. Tom Generating Company LLC, a wholly owned indirect subsidiary of ENGIE North America Inc. As indicated above, the LSIs are no longer functional and have since been decommissioned as part of the facility closure.

1.2.3 Description of the CCR LSIs

The two CCR LSIs are described below.

Basin A

Basin A is a formerly lined earthen basin located approximately 1,500 feet south of the former MTGC power plant. The basin was constructed in the 1980s as an unlined basin and is generally square in shape. The basin functioned as part of the facility's Industrial Wastewater Treatment Plant ("IWWTP"). Coal bottom ash and boiler slag was pumped into Basin A for settling. The supernatant water was then pumped out, the pH adjusted, and then discharged to the Connecticut River.

In 2003, Basin A was lined with a double high-density polyethylene (HDPE) impermeable liner with seepage collection between the layers. In March 2020, Basin A was decommissioned in accordance with the MassDEP ACO under a Release Abatement Measure ("RAM") Plan. Regulatory documents associated with the RAM activities can be found at the website provided in Section 1.2.1. Prior to decommissioning activities an assessment was conducted of Basin A (June 2017). At that time, the basin was generally dewatered and mostly accessible without the use of a boat. The depth of the basin contents was measured at five locations throughout the unit, with an average calculated thickness of approximately 2.3-feet. Based on the dimensions of the unit, it was estimated that approximately 9,000 cubic yards of moist CCR was present above the liner at that time, noting that this was an over-estimate of the amount of CCR in the basin due to the saturated nature of the material.

In March 2020 the liner and pump piping were removed from the basin. An environmental contractor used an excavator to strategically peel back and remove the liner system in

sections, exposing the sand bedding material. In accordance with the MassDEP-approved plan, the sediment materials which were present within the basin were left in place after the liner materials were removed. There is a 12-inch diameter outlet pipe through the embankment that formerly directed discharges toward the Connecticut River that was plugged at the ends in 2020.

The basin was constructed through a combination of excavation into existing grade and earthen embankment fill. The height of embankment fill is estimated to have been approximately 6 feet. The total basin depth is approximately 15 feet. The basin retains its approximate shape. The crest widths of the embankments surrounding Basin A are approximately 12 feet or greater, and the interior basin slopes are approximately three units horizontal run to one unit vertical rise (3H:1V). A chain link fence surrounds the basin. The crest of the embankments surrounding the basin are used for maintenance vehicle access and are generally pitched to drain away from the basin.

Special Basin

The Special Basin is a formerly lined earthen basin that was constructed in the 1980s. The Special Basin is located immediately north of Basin A and is separated from Basin A by an earthen berm. The basin was used to collect and settle particulate from high volume wastewater, overflow from an equalization tank, and discharge from sump pumps. The Special Basin was constructed similarly to Basin A, through a combination of excavation into existing grade, installation of double HDPE impermeable layer (2003), and construction of an embankment. In March 2020, the Special Basin was decommissioned in accordance with the MassDEP ACO under the same RAM Plan used for the closure of Basin A.

Prior to decommissioning activities an assessment was conducted of the Special Basin (June 2017), using a boat. Sediment thickness was gauged in eight locations throughout this basin. The average measured thickness of sediment material was calculated to be approximately 2.4-feet in depth. Based on the dimensions of the basin and the average sediment thickness, it was estimated that the Special Basin contained approximately 5,200 cubic yards (cy) of saturated material, noting that this was an over-estimate of the amount of CCR in the basin due to the saturated nature of the material. In March 2020, the environmental contractor used an excavator to strategically peel back and remove the liner system in sections, exposing the sand bedding material. In accordance with the MassDEP-approved plan, the sediment materials which were present within the basin were left in place after the liner materials were removed.

The height of the embankment is estimated to be 10 feet, and the maximum depth is approximately 15 feet. In addition to the removal of the double liner, the concrete inflow and outflow pump chambers have also been removed. There is a 12-inch diameter outlet pipe from the Sedimentation Basin (not a CCR LSI) that passes through the Special Basin embankment that formerly directed discharges toward the Connecticut River. This pipe was cut and plugged at the ends in 2020.

The Special Basin has a maximum depth of approximately 15 feet, interior side slopes of 3H:1V, and an embankment crest width of approximately 12 feet or wider. The crest of the embankments surrounding the basin are used for maintenance vehicle access to other portions of the MTGC site and are generally pitched to drain away from the basin.

Both basins drain through exfiltration of water through the permeable bottom soils. Neither basin has an inlet or an outlet.

1.2.4 Size Classification

Basin A has a basin depth of approximately 15 feet and a maximum storage capacity of approximately 32.5 acre-feet. Since this basin exceeds both five feet in height and storage volume of greater than 20 acre feet (or a height of greater than 20 feet regardless of volume), Basin A is subject to the requirements of 257.73(c) through (e), which includes the compilation of the history of the CCR unit, periodic structural stability assessments, and periodic safety factor assessments.

The Special Basin has a basin depth of appropriately 15 feet and a maximum storage capacity of approximately 14.0 acre-feet. Therefore, based on the size of the unit, the requirements of 257.73(c) through (e) would not be applicable to the Special Basin if these estimates are correct. A more detailed volume analysis is recommended to confirm the storage volume.

1.2.5 Hazard Potential Classification

The embankment on the north side of the Special Basin separates the Special Basin from the Sedimentation Basin, which was unrelated to CCR. The westerly embankment separates the Special Basin from the former coal pile sump area. The southerly embankment separates the Special Basin from Basin A. Failure of these embankments would cause a release into adjacent basins and/or on-site low areas without threat to public safety. The easterly embankment separates the Special Basin from the Connecticut River; failure of this embankment would release into the Connecticut River, which could cause an isolated increase in water surface elevation, a modest amount of discharge of CCR into the adjacent portion of the river, but does not pose significant public safety risk.

The easterly portion of the embankment on the north side of Basin A separates Basin A from the Special Basin. The westerly portion of this embankment separates Basin A from the former coal pile sump area. The embankment on the west side separates Basin A from an on-site low area. Failure of these embankments would cause a release into adjacent on-site areas without threat to public safety. There is no southerly embankment. The easterly embankment separates Basin A from the Connecticut River; failure of this embankment would release into the Connecticut River, which could cause an isolated increase in water surface elevation, a modest amount of discharge of CCR into the adjacent portion of the river, but does not pose significant public safety risk.

As determined in reports by others[1], since failure of the embankments imposes no public safety risk, and only low levels and isolated areas of environmental damage, the embankments are Low in hazard classification.

1.3 Engineering Data

The following information is obtained from past studies and is intended to provide an overview of the basins.

[1] 2012 CCW Impoundment Inspection Report prepared by GZA GeoEnvironmental, Inc. (GZA)

1.3.1 Drainage Area

The drainage area for Basin A consists of the surface area of the basin and isolated areas on the embankment crest, where water may flow into the basin through low points. The total estimated drainage area is approximately 3 acres.

Similarly, the drainage area for the Special Basin consists of the surface area of the basin and isolated areas on the embankment crest, where water may flow into the basin through low points. The total estimated drainage area is approximately 2 acres.

No piping discharges water into either basin.

1.3.2 General Elevations

Elevations presented are in units of feet and are based on the Massachusetts 1983 vertical datum.

Bottom Ash Basin A

A.	Top of Embankments	121.5’ +/-
B.	Normal Pool	None – no water retention
C.	Bottom elevation	106’ +/-
D.	Estimated volume	32.5 acre-feet

Special Basin

A.	Top of Embankments	121.5’ +/-
B.	Normal Pool	None – no water retention
C.	Bottom elevation	106’ +/-
D.	Estimated volume	14.0 acre-feet

Section 2
Inspection

2.1 Visual Inspection *(257.83(b)(1)(ii))*

Basin A and the Special Basin were visually inspected on January 17, 2025. At the time of the inspection, the weather was clear with temperatures in the 10's °F. No standing water was present in the basins at the time of the inspection. Photographs were taken to document the current conditions of the basins during the inspection, and are included in Appendices A and B, and the general observations and findings are discussed in more detail in the following sections.

2.1.1 Bottom Ash Basin A

- Interior Slopes
  - The interior slopes of Basin A are generally vegetated with areas of marginal vegetative cover and minor erosion.
  - The east, north, and south interior slopes are marginally vegetated with low scrub plants.
  - The vegetation on the west slope exhibited sparse to fair coverage, although some brush is establishing.
  - The north slope exhibited minor erosion rills, particularly along its easterly end.
- Embankment Crests
  - The embankment crest has sparse vegetation along much of its length, and with vehicular rutting and evidence of puddling in some low areas.
  - The crest generally pitches away from the interior slope, reducing the contributory drainage area to the basin.
  - One low point was present along the eastern side, where the runoff appears to have eroded the crest causing drainage into the basin.
- Exterior Slopes
  - The east exterior slope is densely vegetated with large trees and brush.
  - The west exterior slope and west portion of the north exterior slope are densely vegetated with brush and woody vegetation.
  - The east portion of the north slope is an interior slope of the Special Basin and discussed in Section 2.1.3.
- Impoundment Bottom
  - The bottom of the basin is covered in a thick layer of brush that has been partially matted down due to winter conditions/seasonal dormancy.
  - The soil surface was not visible.
- Appurtenances
  - A 4-foot high chain link fence surrounds the basin.
  - The fence gates were unlocked, and one was ajar. Note that the fence gates were secured subsequent to the inspection.

- The fence had areas of minor damage; however, the fencing remains functional for Site security (see Photo 20 in Appendix A).

2.1.2 Special Basin

- Interior Slopes
  - The interior slopes are generally vegetated with some riprap slope protection in apparent nuisance areas.
  - The south interior slope also serves as the east portion of the northerly exterior slope of Basin A. This slope has marginal vegetative cover and minor erosion, particularly near its west end but also at its east end.
  - An area of marginal vegetative cover is present along the west interior slope near its north end.
  - Riprap is present at the west end of the north interior slope. The center portion of this slope has marginal vegetative cover.
  - Cut brush debris is present at the eastern end of the north interior slope and along the upper portion of the majority of the east interior slope.
- Embankment Crests
  - The south crest is wide and covered with gravel.
  - The west crest is covered with a combination of gravel and sparse vegetation. Two low areas are present along the vehicle ruts.
  - The north embankment crest is wide and covered with a combination of gravel and sparse vegetation.
  - The east crest is narrow and moderately vegetated. Brush is encroaching on both sides along the majority of its length.
- Exterior Slopes
  - The south exterior slope is the east portion of the north interior slope of Basin A; see Basin A for a discussion of its condition.
  - The west exterior slope is located within the coal pile sump. This slope is densely vegetated with some brush present.
  - The north exterior slope is within the settling basin not covered by this rule. It is sparsely vegetated with riprap present in areas for erosion resistance.
  - The east exterior slope is densely vegetated with brush and trees.
- Impoundment Bottom
  - The bottom of the basin is vegetated with the vegetation having been matted down due to winter conditions/seasonal dormancy.
  - The soil surface was not visible.
- Appurtenances
  - A 4-foot high chain link fence surrounds the basin.
  - The fence gates were unlocked, and one was ajar Note that the fence gates were secured subsequent to the inspection
  - The fence had areas of minor damage; however, the fencing remains functional for Site security (see Photo 11 in Appendix B).

2.1.3 Downstream Area

- There is no apparent public safety risk associated with the basin berms failing.

2.1.4 Impoundment Area

- The impoundments contain no visible water.
- There is little tributary drainage area to either impoundment.

2.2 Comparison to Previous Inspections

Changes in Geometry Since Last Inspection (257.83(b)(2)(i))

The 2025 inspection is the initial inspection under this program. There have been changes since the CCR LSIs were inspected in 2011 by GZA GeoEnvironmental; the basin liners have been removed, piping plugged, and minor regrading of the basin bottom occurred (see Section 1.2.3 for minor alterations conducted under the 2020 RAM). Minor grading around the basin crests may have reduced precipitation inflow into the basins. The water level in the basins has been reduced to typically no standing water through removal of the impervious liners. There has been minor erosion of the interior side slopes in some areas, some of which has been repaired with riprap.

Instrumentation (257.83(b)(2)(ii))

The 2025 inspection is the initial inspection under this program. There have been changes since the CCR LSIs were inspected in 2011 by GZA GeoEnvironmental, including removal of the level gauges within the basins since they no longer receive or impound water. There is no instrumentation remaining in the basins.

Impoundment Characteristics (257.83(b)(2)(iii, iv, v))

The following table summarizes the impoundment characteristics:

Table 1 – Basin Characteristics Summary

	Bottom Ash Basin A	Special Basin
Water surface elevation at time of inspection	No water visible	No water visible
Approximate minimum, maximum, and present depth/elevation of impounded water since last annual inspection	No water impounded since decommissioning in 2020	No water impounded since decommissioning in 2020
Approximate minimum, maximum, and present depth of CCR since last annual inspection	Assessments conducted prior to the removal of the liner reported an average depth of 2.3 feet of CCR material. No additional CCR has been added to the basin since facility closure in 2014	Assessments conducted prior to the removal of the liner closure reported an average depth of 2.4 feet of CCR material. No additional CCR has been added to the basin since facility closure in 2014
Total storage capacity of CCR LSI at time of inspection (to brim-full)	52,400 cubic yards (cy)*	22,600 cy*

	Bottom Ash Basin A	Special Basin
Approximate volume of water at the time of the inspection	No water visible	No water visible
Approximate volume of CCR at the time of the inspection	9,000 cy**	5,200 cy**

*volume estimates are approximated based on publicly-available GIS data. More detailed estimates are recommended.

**Estimated volume from before liner removal (see Section 1.2.3). Material is now vegetated in basin bottom.

2.3 Hydrologic/Hydraulic Data

Detailed Hydrologic and Hydraulic (H&H) analyses have not been performed for either basin. GZA GeoEnvironmental, Inc. presented preliminary H&H estimates as part of their 2011 inspection performed for the United States Environmental Protection Agency (USEPA). The estimates assumed:

- 100-year flood design storm.
- 100% rainfall running into the basins from their drainage areas.
- Larger drainage areas than now exist.
- Water present in the basins as maximum pool prior to the onset of precipitation.

Despite these conservative assumptions, the report concluded that the basins would perform adequately. Since that time, the modifications to the basins have resulted in the basins being completely drained, have been decommissioned, and do not store water. As such, the basins have excess capacity and are not at risk for overtopping during a 100-year storm design flood. A more detailed analysis is not expected to show that the basins would be hydraulically inadequate, although Tighe & Bond understands such an analysis for each basin will likely be required by 257.82.

2.4 Geotechnical / Structural Stability

There are no records of a stability analysis of the basin embankments available for review during the inspection and preparation of this report. Visual observations made at the time of the inspection indicate that the structures appear to be stable. The decommissioned status of the basins with absence of water further benefits their stability. A more comprehensive analysis should be performed for Basin A to confirm this observation. The Special Basin is currently estimated to be below the size criteria at 257.73(a) exempting it from requiring more detailed analysis.

2.5 Inspection Program

Based on the nature of the basins and the status of the facility (decommissioned and un-manned), the weekly to monthly inspection requirements for CCR Surface Impoundments set forth at 257.83(a)(1)(i-iii) are unnecessary and not likely to provide relevant data. Based on the conditions of the basins and overall facility, the CCR LSIs inspections will be conducted quarterly by a qualified person, concurrent with the dust inspections required under 257.80. Because Basin A is subject to the periodic structural stability assessment requirements set forth in 257.73(d), it will be inspected on an annual basis by a qualified professional engineer, in accordance with 257.83(b)(1). As set forth in 257.83(b)(4)(ii),

in any calendar year in which both the periodic inspection by a qualified professional engineer and the quinquennial (five-year) structural stability assessment required by 257.73(d) are required to be completed, the annual inspection is not required and therefore will not be completed on that occasion.

Section 3
Assessments and Conclusions

3.1 Assessments

Based on the visual inspection and a review of available information, the following conditions currently exist at the MTGC facility CCR LSIs:

1. The ability of the two basins to impound water has been significantly reduced through the removal of the liners.
2. As determined in reports by others, since failure of the embankments impose no public safety risk, and only low levels and isolated areas of environmental damage, the embankments are Low in hazard classification.
3. The Special Basin's maximum storage capacity is estimated to be less than 15 acre-feet, thus the requirements at 257.73(c)-(e) are not applicable.
4. The basins have adequate capacity to store a 100-year storm without overtopping, provided they continue to drain through groundwater infiltration.
5. Pipe penetrations remain in the east embankments of both basins, although they have been decommissioned by being plugged at each end.
6. Given the absence of stored water, the probability of the basins' deterioration causing a catastrophic failure with adverse consequences is very low.

3.2 Conclusions

Based on the assessment of the CCR LSIs at the MTGC facility, the following conclusions are made:

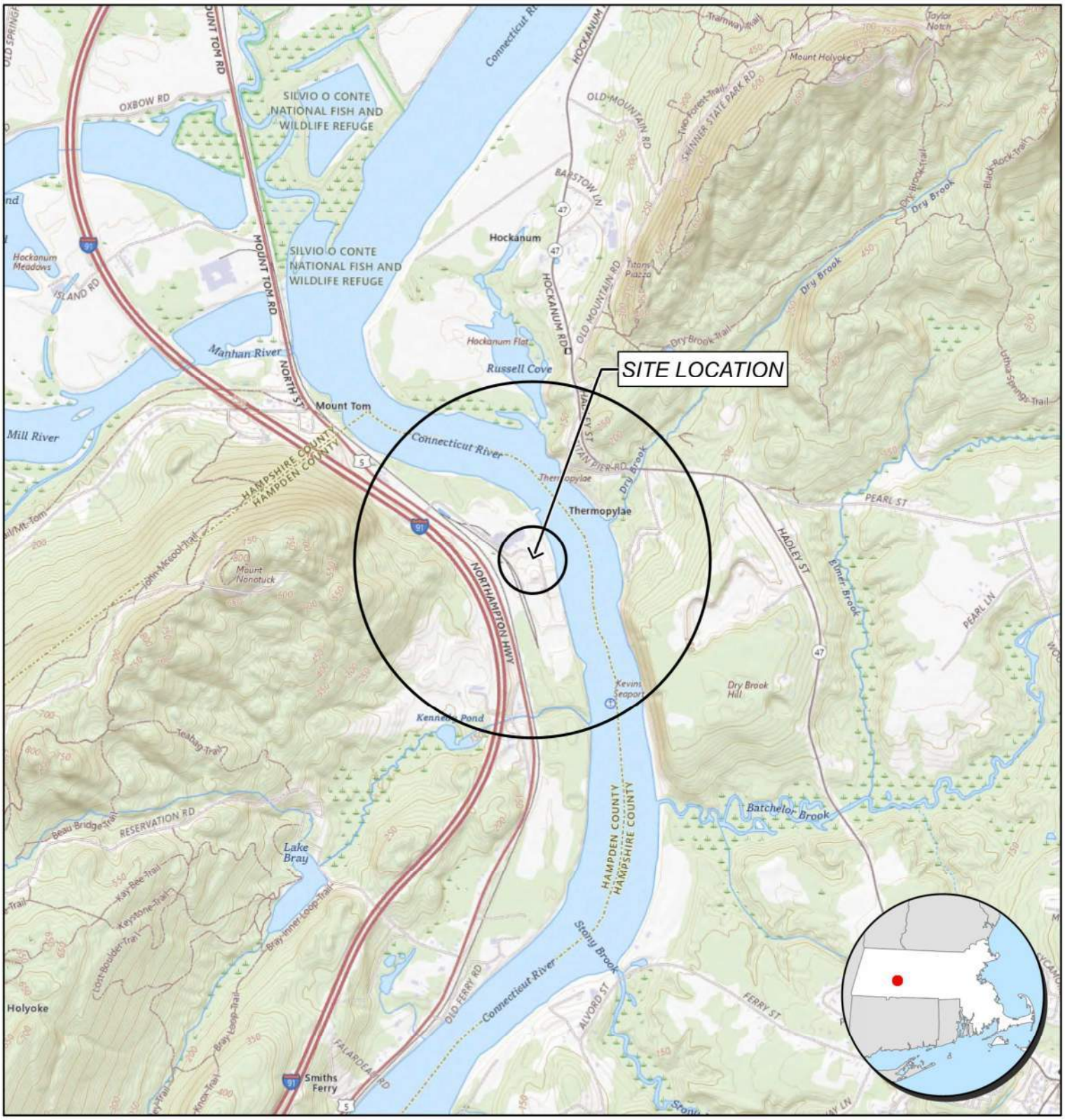
1. The basins exhibit minor deterioration that should be addressed
    a. Vegetative cover of the basins is marginal in many areas, with exposed soils (primarily the interior slopes) and brush and tree growth present.
    b. Minor erosion is present on the basin interior slopes, likely as a result of the marginal vegetative cover.
    c. Minor rutting and several low areas are present on the embankment crests.

These issues will be incorporated into the existing maintenance plans for the property, conducted in tandem with corrective actions that support the requirements of the MCP.

FIGURES

FIGURE 1
SITE LOCATION
April 2025

Mt. Tom CCR LSI Initial Annual Inspection Report
200 Northampton Street
Holyoke, Massachusetts



Tighe&Bond

Based on USGS The National Map Topo Basemap.
Contour Interval Equals 10-Feet.
Circles indicate 500-foot and half-mile radii.

N

1:24,000
0 1,000 2,000
Feet

FIGURE 2
SITE ORTHOPHOTOGRAPH
April 2025

Mt. Tom CCR LSI Initial Annual Inspection Report
200 Northampton Street
Holyoke, Massachusetts

- - - Municipal Boundary

Tighe&Bond

Based on latest Nearmap Imagery.

N

1:3,600
0 150 300
Feet

APPENDIX A

Photo 1 – Bottom Ash Basin A from the north looking south

Photo 2 – East interior slope; note sparse vegetation

Photo 3 – Crest of east embankment; note sparse vegetation and minor rutting

Photo 4 – East embankment exterior slope; note trees and brush

Photo 5 – Interior of basin from northeast corner

Photo 6 – Berm along top of interior slope

Photo 7 – North interior slope; note sparse vegetation

Photo 8 – Low, eroded area at upstream edge of crest on east embankment

Photo 9 – Access cover along east embankment crest

Photo 10 – Marginal vegetation along south portion of east interior slope

Photo 11 – East embankment crest from south

Photo 12 – East exterior slope from south; note heavy trees and brush

Photo 13 – South interior slope; note marginal vegetation

Photo 14 – South embankment; note marginal vegetation

Photo 15 – South embankment; note marginal vegetation

Photo 16 – South interior slope looking east

Photo 17 – South crest looking west

Photo 18 – West embankment looking north; note woody vegetation along interior slope

Photo 19 – Basin bottom

Photo 20 – Bending of fence section, potentially due to mechanical contact (e.g., fallen tree or construction equipment)

Photo 21 – West embankment looking north; note woody vegetation along interior slope

Photo 22 – West interior slope; note woody vegetation

Photo 23 – South interior slope; note woody vegetation and areas of sparse cover

Photo 24 – South crest; note brush

Photo 25 – North exterior slope along coal pile sump; note woody vegetation

Photo 26 – North exterior slope along coal pile sump; note woody vegetation

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APPENDIX B

Photo 1 – Overview of Special Basin from southwest corner; note sparse vegetation on slope

Photo 2 –West embankment crest looking north; note low area (red arrow)

Photo 3 – Open gate in fence along west embankment

Photo 4 – Interior slope of west embankment looking south; note area of marginal vegetation (red arrow) and riprap in lower left of photo

Photo 5 – Northwest corner of special basin

Photo 6 –Low area with rutting on west crest

Photo 7 –Exterior slope of west embankment; standing water is in former coal pile sump.

Photo 8 – North embankment crest

Photo 9 – Interior slope of north embankment; note riprap on slope and sparse vegetation

Photo 10 –North embankment crest and fence line

Photo 11 – North embankment interior slope; note cut vegetation

Photo 12 – East embankment crest looking south; note trees on exterior slope and brush growing along fence line.

Photo 13 –East interior slope

Photo 14 – Trees along east exterior slope

Photo 15 –East embankment crest; note minor rutting

Photo 16 –East interior slope looking north

Photo 17 – Junction of east interior slope and south interior slope; note marginal vegetative cover and erosion rills

Photo 18 – South interior slope

Photo 19 – East interior slope looking north

Photo 20 –East crest; note trees on exterior slope

Photo 21 –View across basin looking northwest

Photo 22 –View along east embankment

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APPENDIX C

Date:

Annual CCR Legacy Surface Impoundment Inspection Form

Inspect for any appearance of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the safety of the CCR unit

Bottom Ash Basin A

Inspection Findings: 257.83(b)(2)(i) through (vii)

-Any changes in geometry of the impounding structures since the previous annual inspection:

-The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection:

N/A

-The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection:

-The storage capacity of the impounding structure at the time of inspection:

-The approximate volume of the impounded water and CCR at the time of the inspection:

-Any appearance 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 appurtenant structures:

-Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection:

Corrective Measures Taken:

Inspected by:_____ Date: _____

Signed: _____

Reviewed by: _____

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