



**2024 VISUAL INSPECTION OF ASH POND EMBANKMENTS
AES PETERSBURG ASH POND SYSTEM**

AES INDIANA PETERSBURG GENERATING STATION
6925 NORTH STATE ROAD 57
PETERSBURG, INDIANA 47567

ATLAS PROJECT NO. 170AES0005

NOVEMBER 12, 2024

PREPARED FOR:

AES INDIANA
6925 NORTH STATE ROAD 57
PETERSBURG, INDIANA 47567

ATTENTION: MR. BRADEN HENSON



Atlas Technical Consultants

7988 Centerpoint Dr.
Suite 100
Indianapolis, IN 46256

Phone +1 317 849 4990
Fax +1 317 849 4278

www.oneatlas.com

November 12, 2024

Mr. Braden Henson
Team Leader
AES Indiana
6925 North State Road 57
Petersburg, Indiana 47567-0436

**Re: 2024 Visual Inspection of Ash Pond Embankments
Petersburg Ash Basin Pond System
AES Indiana**
Petersburg Generating Station
Petersburg, Indiana
ATLAS Project No. 170AES0005

Dear Mr. Henson:

Atlas Technical Consultants is pleased to present the findings of the September 26, 2024, Visual Site Inspection of the AES Petersburg Generating Station Ash Pond Embankments of the Ash Ponds A, A', B, C and D. This visual inspection and report were done in accordance with guidelines established by the Coal Combustion Residuals (CCR) Rule published by the Environmental Protection Agency (EPA) on April 17, 2015.

The scope of this inspection was limited to an examination of readily observable surficial features of the ash pond embankments and its appurtenant structures, and a review of information that you provided. Please note that the inspection did not include any test drilling, testing of materials, precise physical measurements of ash pond system features, detailed calculations to verify slope stability, or other engineering analyses. Although the inspection was conducted by competent personnel in accordance with generally accepted methods for ash pond systems, it should not be considered as a warranty or guaranty of the future performance/safety of the ash pond embankments.

The AES Petersburg Generating Station Ash Basin Pond System is located about four (4) miles north of the City of Petersburg in Pike County, Indiana west of State Road 57 (Figure 1). The ash pond system encompasses an area of approximately 157.9 acres (Figure 2).

The ash pond embankments inspection was completed by Juan Carrizo and Asma Rony of Atlas Technical Consultants on September 26, 2024. The weather condition during the inspection were between 55°F and 76°F and sunny. Contained herein is a summary of the engineering observations of the ash pond embankments including condition of the pond embankment side slopes, grading and erosion, vegetation, haul roads, perimeter ditches, down drain channels, riprap areas, culverts, and

other adjacent structures. A vicinity map and the ash pond limits are shown in Figures 1 and 2 of this report for reference.

The 2024 Annual Inspection was performed to address the standards and guidelines required by the CCR Rule instituted by the Environmental Protection Agency on April 17, 2015. As a result, CCR ash ponds are now required to meet the requirements of 40 C.F.R. §257 to conduct annual inspections of the landfill in accordance with 40 C.F.R. §257.83(b). Listed below are requirements specified within the CCR Rule and the observations made by Juan D. Carrizo during the annual inspection:

- i. A review of available information regarding the status and condition of the CCR Unit;
- ii. A visual inspection of the CCR Unit to identify signs of distress or malfunction;
- iii. A visual inspection of any hydraulic structures underlying the base of the CCR unit.

Inspection Summary

A site inspection grid map for the ash pond system at the AES Petersburg station is presented in Figure 3. The area occupied by Ash Pond D has been repurposed with the construction of a wastewater treatment plant, Ash Ponds B and C are closed, and Ash Pond A and A' are closed in-place, certification report sent to IDEM and awaiting approval.

Engineering observations performed on September 26, 2024 are shown in Figure 3, 2024 Visual Site Inspection Grid Map. Atlas visually inspected the embankments for Ash Ponds A, A', B, C, and D and found no areas of instability. However, there were few areas with minor erosion issues on sections of Ash Pond A, B and C (Figure 3).

A description of the inspection findings is presented in sections below.

Changes in Geometry of Ash Pond

There were no changes observed to the geometry of Ponds A, A', B, C and D.

Ash Pond A and A'

Ash Pond A & A', approximately 70.1 acres in size, are closed in place and have a Geocomposite final cover system installed over the ash pond system. Ash Ponds A and A' do not receive ash anymore. Minor erosion and overgrown vegetation were observed on a few spots as indicated below.

1. Debris and/or tall vegetation observed around outlet pipe riprap located on south side of the Ash Pond A (location ID A-3).
 - o Recommendation: Cut down tall vegetation at riprap area.

2. Minor erosion and bare spots were observed at five separate locations on the top section of Ash Pond B (location ID A-14, A-15, A-16 A-20, and A-22 of Figure 4).
 - Recommendation: Overseed these areas to establish a protective grass cover.

Ash Pond B

Ash Pond B is approximately 33.1 acres and was closed with a geomembrane final cover except for the south side slope which was closed with an approved soil final cover. As part of the closure work on Pond A, located to the south of Pond B, the soil final cover along the south slope of Pond B was replaced with a geomembrane cover. In general, this pond has a good soil cover and is well-vegetated along the side slopes and top of the former ash pond basin. Minor erosion and overgrown vegetation were observed on a few spots as indicated below.

3. Accumulated sediments/debris and/or tall vegetation observed at three separated drop inlets located on the Ash Pond B (locations B-2, B-15, and B-16 of Figure 4).
 - Recommendation: Cut down tall vegetation and remove debris from the drop inlets.
4. Minor erosion rills were observed at six separate locations on the west section of Ash Pond B (locations B-3, B-4, B-5, B-6, B-8, and B-9 of Figure 4).
 - Recommendation: Repair the soil cover and overseed these areas to establish a protective grass cover.
5. The drop inlet domed grate cover is damaged at location B-10 and B-15, on the west side of the Ash Pond B.
 - Recommendation: Replace the drop inlet domed grate cover.

Ash Pond C

Ash Pond C is approximately 45.7 acres. It has been closed with a geomembrane final cover and does not receive ash anymore. The former ash pond has a good soil cover and vegetation established along the side slopes and upper cover. Minor erosion and overgrown vegetation were observed on a few spots as indicated below.

6. Accumulated sediments/debris and/or tall vegetation observed at five separate locations on the Ash Pond C (locations C-1, C-5, C-11, C-14, and C-15, of Figure 4).
 - Recommendation: Cut down tall vegetation and remove debris from the drop inlets.

7. Minor erosion rills were observed at two separate locations on the north section of Ash Pond C (locations C-2, and C-8 of Figure 4).
 - o Recommendation: Repair the soil cover and overseed these areas to establish a protective grass cover.

Ash Pond D

The area for Ash Pond D is approximately 8 acres. It has been repurposed and is now entirely occupied by a wastewater treatment plant and a parking facility.

Structural Integrity

All ash pond embankment slopes appear to be stable with no visual indications or signs of sloughing or subsidence were detected during this inspection.

Stability and Operation

The ash pond embankments are generally in good condition and the slopes are well vegetated in most places. Areas of localized surficial erosion were found around a few areas of Ash Pond A. Those erosional features did not appear to penetrate through the soil cover, but they should be refilled and revegetated to prevent further damage to the cover or embankments. No other significant deficiencies were noted and operation of the ash pond system at this time is not expected to be adversely affected by any items detected during the 2024 inspection.

We appreciate the opportunity to assist you with this project. If you have any questions concerning information contained in this report, please do not hesitate to call either of the undersigned at 317.849.4990.

Sincerely,

Atlas Technical Consultants L.L.C.

Juan Carrizo, P.E.
Senior Project Engineer

Asma A. Rony, Ph.D.
Staff Engineer

Attachments:

| | |
|----------|-------------------------------------|
| Figure 1 | Vicinity Map |
| Figure 2 | CCR Ash Pond System |
| Figure 3 | Site Plan for Observation Locations |

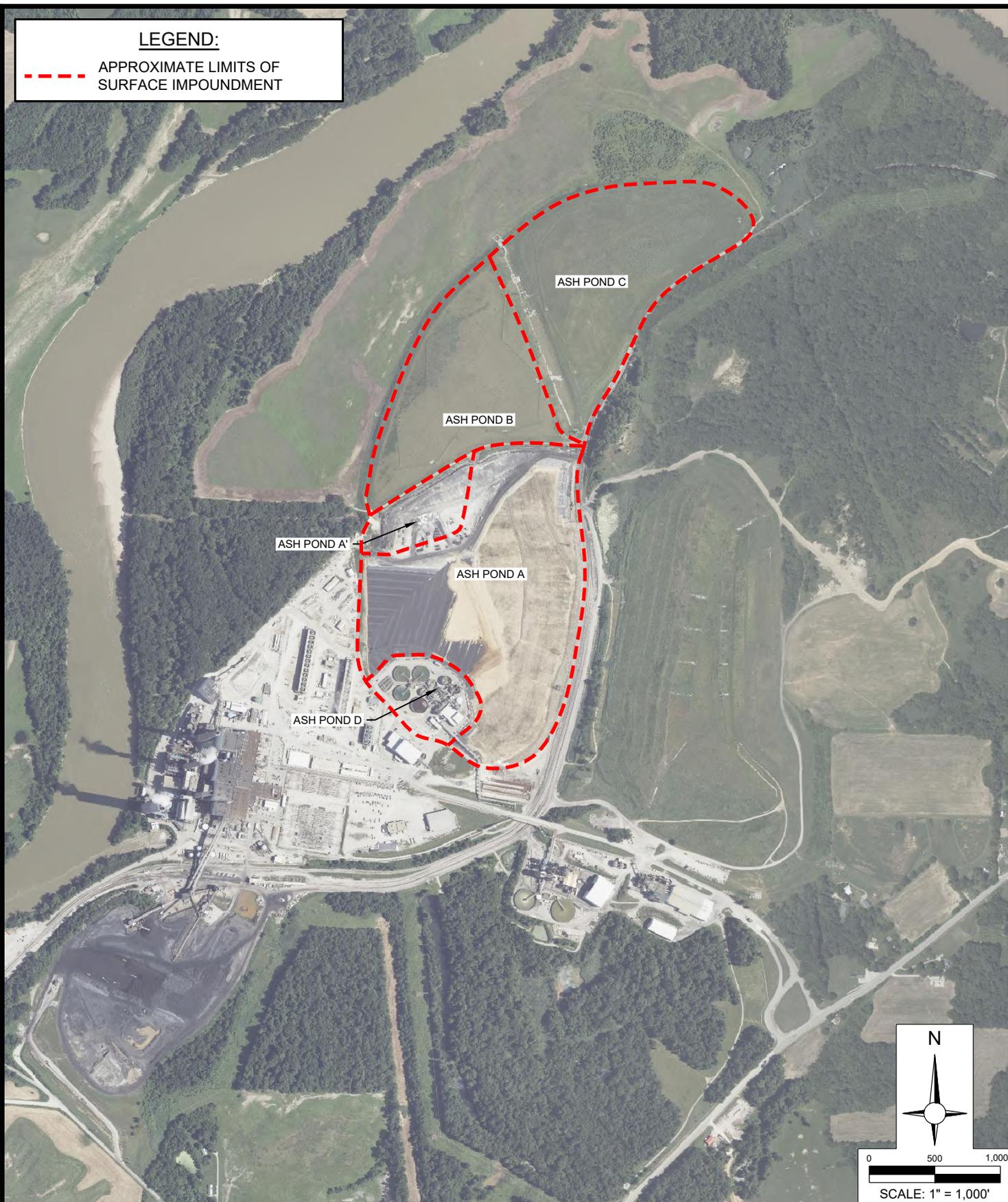
Attachments

- Figure 1 Vicinity Map
- Figure 2 CCR Ash Pond System
- Figure 3 Site Plan for Observation Locations

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LEGEND:

 APPROXIMATE LIMITS OF SURFACE IMPOUNDMENT



**CCR ASH POND SYSTEM
CCR ASH POND EMBANKMENT ANNUAL INSPECTION REPORT**

AES PETERSBURG ASH POND SYSTEM
AES INDIANA
6925 NORTH STATE ROAD 57
PETERSBURG, INDIANA

Project Number:
TBD

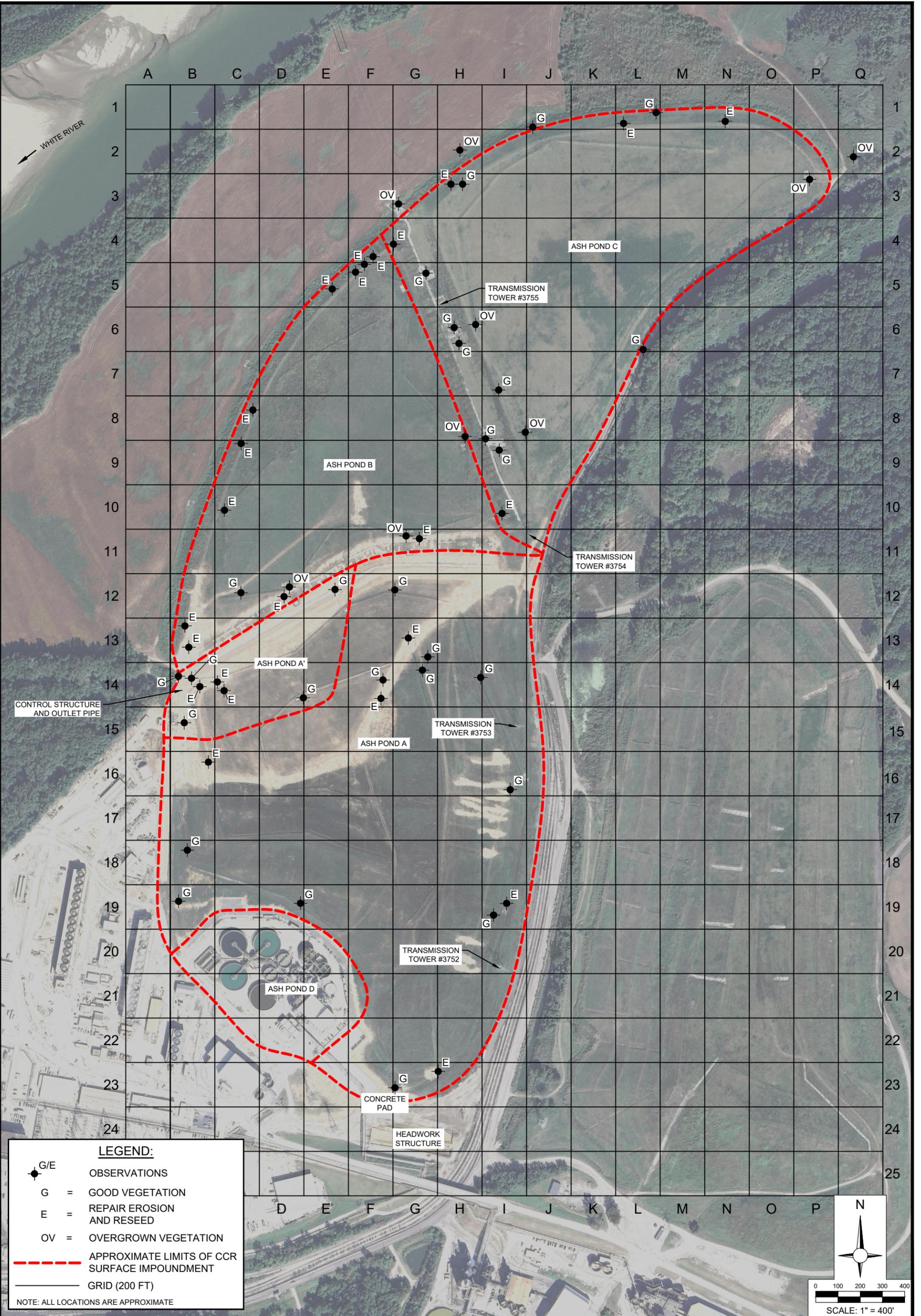
Date:
11/11/2024

Scale:
AS SHOWN

Drn. By:
BH

Ckd. By:
JC





LEGEND:

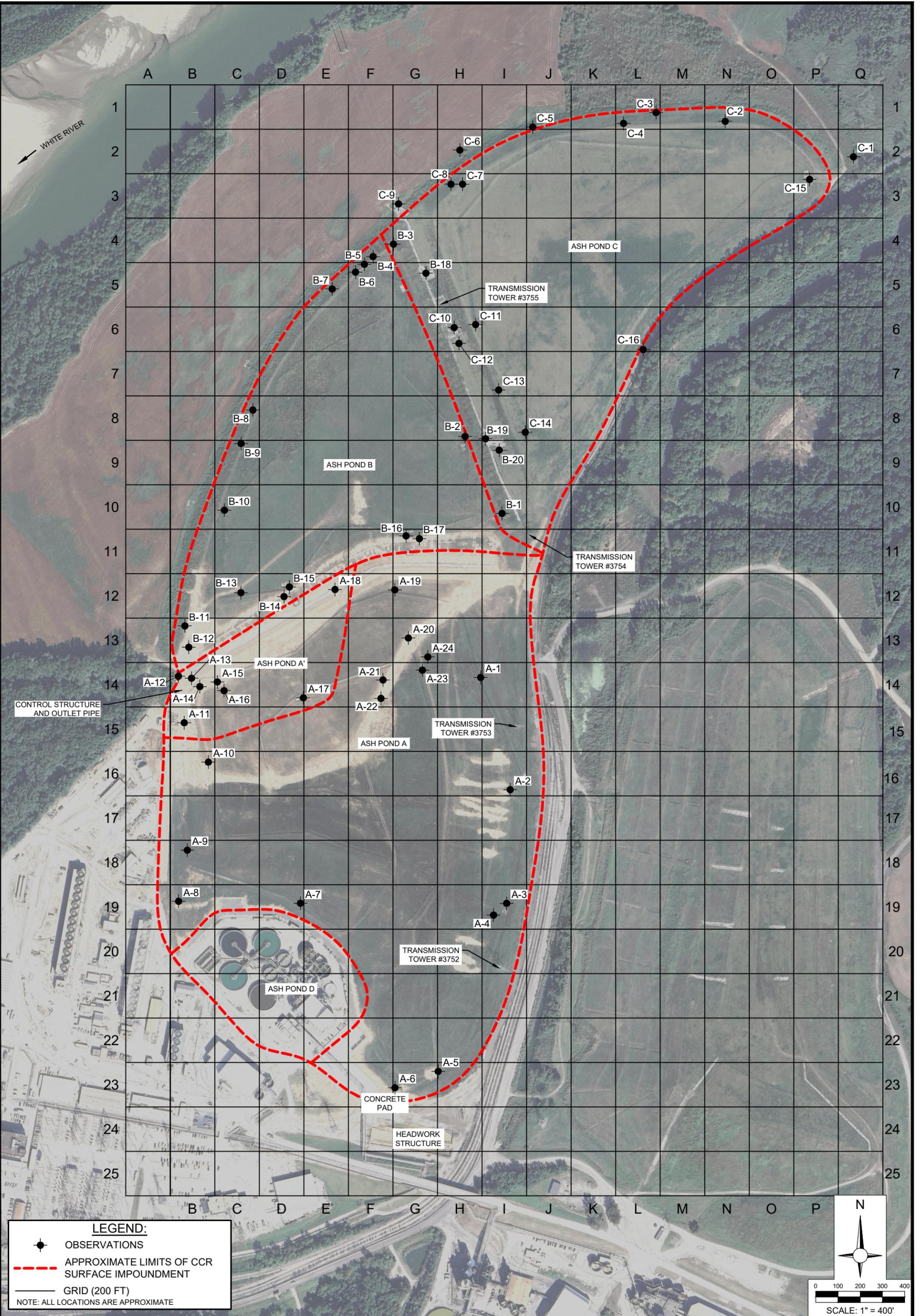
- G/E OBSERVATIONS
- G = GOOD VEGETATION
- E = REPAIR EROSION AND RESEED
- OV = OVERGROWN VEGETATION
- APPROXIMATE LIMITS OF CCR SURFACE IMPOUNDMENT
- GRID (200 FT)

NOTE: ALL LOCATIONS ARE APPROXIMATE

N

0 100 200 300 400
SCALE: 1" = 400'

| | | | | | | | |
|----------|---------------------|--------------|----------------|---------------------|-------------------------------|--|--|
| 3 | Figure: AS SHOWN | Scale: BH | Dwn. By: JC | Date: 11/11/2024 | Project Number: 170AES0005 | <p>SITE PLAN FOR OBSERVATION LOCATIONS NOVEMBER 5, 2024 AES PETERSBURG ASH POND SYSTEM AES INDIANA 6925 STATE ROAD 57 PETERSBURG, INDIANA</p> | |
|----------|---------------------|--------------|----------------|---------------------|-------------------------------|--|--|

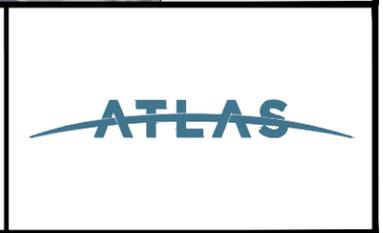


LEGEND:
 ● OBSERVATIONS
 - - - APPROXIMATE LIMITS OF CCR SURFACE IMPOUNDMENT
 — GRID (200 FT)
 NOTE: ALL LOCATIONS ARE APPROXIMATE

N
 0 100 200 300 400
 SCALE: 1" = 400'

| | | |
|----------|----------|----------|
| 4 | Figure | AS SHOWN |
| | Scale | |
| | Dwn. By: | BH |
| | Qtd. By: | JC |

SITE PLAN FOR PHOTO LOCATIONS
NOVEMBER 5, 2024
 AES PETERSBURG ASH POND SYSTEM
 AES INDIANA
 6925 STATE ROAD 57
 PETERSBURG, INDIANA



| | | |
|---|---------------------------|--|
| Grid ID H-14 | Location ID A-1 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation on east side of Ash Pond A. Photo looking west. No issues observed. | | |
| Grid ID I-16 | Location ID A-2 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation on east side of Ash Pond A. Photo looking east. No issues observed. | | |

| | | |
|---|---------------------------|--|
| Grid ID I-19 | Location ID A-3 |  |
| Date September 26, 2024 | | |
| Description: Overgrown vegetation observed around the riprap area. Recommend cutting down tall vegetation. | | |
| Grid ID I-19 | Location ID A-4 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established on east section of Ash Pond A. No issues observed. | | |

| | | |
|--|---------------------------|--|
| Grid ID H-23 | Location ID A-5 |  |
| Date September 26, 2024 | | |
| Description: Drop inlets in the south side of Ash Pond A are in good conditions. Recommend re-seeding bare spots adjacent to drop inlets. | | |
| Grid ID G-23 | Location ID A-6 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established on south section of Ash Pond A. No issues observed. | | |

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| Grid ID D-19 | Location ID A-7 |  A wide-angle photograph showing a large, open field of tall, green and yellowish grass in the foreground. In the background, a large industrial facility with several tall smokestacks is visible under a bright blue sky with scattered white clouds. |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed along south side of Ash Pond A, adjacent to Ash Pond D to the left of the photo. No issues found. | | |
| Grid ID B-19 | Location ID A-8 |  A photograph of a grassy field with a black drop inlet in the center. In the background, there is a large, multi-story building with a grid-like facade, possibly a solar panel array or a large storage structure, and a fence line. The sky is blue with white clouds. |
| Date September 26, 2024 | | |
| Description: Drop inlets appear well maintained. No issues observed. | | |

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| Grid ID B-18 | Location ID A-9 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed along the west side of Ash Pond A. No issues found. | | |
| Grid ID B-16 | Location ID A-10 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the northwest side of Ash Pond A. Recommend re-seeding bare spots. | | |

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| Grid ID B-15 | Location ID A-11 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed on the west side of Ash Pond A'. No issues found. | | |
| Grid ID B-14 | Location ID A-12 |  |
| Date September 26, 2024 | | |
| Description: Access road along west side of Ash Pond A', with Outfall Control Structure on the background. No issues found. | | |

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| Grid ID B-14 | Location ID A-13 |  |
| Date September 26, 2024 | | |
| Description: Riprap channel between Ash Pond A' and B looked well maintained. No issues found. | | |
| Grid ID B-14 | Location ID A-14 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the northwest side of Ash Pond A'. Recommend re-seeding bare spots. | | |

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| Grid ID C-14 | Location ID A-15 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the northwest side of Ash Pond A'. Recommend re-seeding bare spots. | | |
| Grid ID C-14 | Location ID A-16 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the north side of Ash Pond A'. Recommend re-seeding bare spots. | | |

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|---|----------------------------|--|
| Grid ID D-14 | Location ID A-17 |  |
| Date September 26, 2024 | | |
| Description: Riprap on the north side is in good condition. No issues found. | | |
| Grid ID E-12 | Location ID A-18 |  |
| Date September 26, 2024 | | |
| Description: Riprap channel between Ash Pond A' and B looked well maintained. No issues found. | | |

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| Grid ID G-12 | Location ID A-19 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed near the north berm. No issues found. | | |
| Grid ID G-13 | Location ID A-20 |  |
| Date September 26, 2024 | | |
| Description: Bare spots and soil erosion observed on the north side of Ash Pond A. Recommend re-seeding bare spots. | | |

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| Grid ID F-14 | Location ID A-21 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed. No issues found. | | |
| Grid ID F-14 | Location ID A-22 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the north top slope of Ash Pond A. Recommend re-seeding bare spots. | | |

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| Grid ID G-14 | Location ID A-23 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed. No issues found. | | |
| Grid ID G-13 | Location ID A-24 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetation observed. No issues found. | | |

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| Grid ID I-10 | Location ID B-1 |  |
| Date September 26, 2024 | | |
| Description: Animal burrow observed on the southeast side of Ash Pond B. Recommend repair and reseed. | | |
| Grid ID H-8 | Location ID B-2 |  |
| Date September 26, 2024 | | |
| Description: Tree saplings and overgrown vegetation observed around the drop inlet. Recommend cutting down tall vegetation and tree saplings. | | |

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| Grid ID G-4 | Location ID B-3 |  |
| Date September 26, 2024 | | |
| Description: Erosion observed on the northwest side of Ash Pond B. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |
| Grid ID F-4 | Location ID B-4 |  |
| Date September 26, 2024 | | |
| Description: Erosion observed on the west side of Ash Pond B. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |

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| Grid ID F-5 | Location ID B-5 |  |
| Date September 26, 2024 | | |
| Description: Erosion rill observed on the west side. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |
| Grid ID F-5 | Location ID B-6 |  |
| Date September 26, 2024 | | |
| Description: Erosion rill observed on the west side. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |

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| Grid ID E-5 | Location ID B-7 |  |
| Date September 26, 2024 | | |
| Description: Animals borrow and bare spot observed on the west side. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |
| Grid ID C-8 | Location ID B-8 |  |
| Date September 26, 2024 | | |
| Description: Erosion rill observed on the west side. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |

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| Grid ID C-9 | Location ID B-9 |  |
| Date September 26, 2024 | | |
| Description: Erosion rill observed on the west side. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |
| Point ID C-10 | Location ID B-10 |  |
| Date September 26, 2024 | | |
| Description: The drop inlet domed grate cover is damaged. Recommend replacing the drop inlet domed grate cover. | | |

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| Point ID B-13 | Location ID B-11 |  |
| Date September 26, 2024 | | |
| Description: Erosion observed on the southwest side. Recommend re-seed bare spots for proper vegetative cover. | | |
| Point ID B-13 | Location ID B-12 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the southwest side of Ash Pond B. Recommend re-seeding bare spots for proper vegetative cover. | | |

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|---|----------------------------|--|
| Point ID C-12 | Location ID B-13 |  |
| Date September 26, 2024 | | |
| Description: Well established vegetative cover observed on the south side of Ash Pond B. No issues observed. | | |
| Point ID D-12 | Location ID B-14 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the south side of Ash Pond B. Recommend re-seeding bare spots for proper vegetative cover. | | |

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| Point ID D-12 | Location ID B-15 |  |
| Date September 26, 2024 | | |
| Description: One of the drop inlet domed grate covers is damaged. Tree saplings and tall vegetation observed around the drop inlets. Recommend replacing the damaged drop inlet domed grate cover and removing excess vegetation growth. | | |
| Point ID G-11 | Location ID B-16 |  |
| Date September 26, 2024 | | |
| Description: Tree saplings and tall vegetation observed around the drop inlets. Recommend removing excess vegetation growth. | | |

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| Point ID G-11 | Location ID B-17 |  |
| Date September 26, 2024 | | |
| Description: Bare spots observed on the south side of Ash Pond B. Recommend re-seeding bare spots. | | |
| Point ID G-5 | Location ID B-18 |  |
| Date September 26, 2024 | | |
| Description: Rip-rap channel between Ash Pond B and C on the east side looked well maintained, No issues observed. | | |

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|---|----------------------------|--|
| Point ID I-8 | Location ID B-19 |  |
| Date September 26, 2024 | | |
| Description: Rip-rap channel between Ash Pond B and C on the east side looked well maintained, No issues observed. | | |
| Point ID I-9 | Location ID B-20 |  |
| Date September 26, 2024 | | |
| Description: Vegetative cover looked well established on the east of Ash Pond B. No issues observed. | | |

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|---|---------------------------|--|
| Point ID Q-2 | Location ID C-1 |  |
| Date September 26, 2024 | | |
| Description: Groundwater monitoring well AP-7 found to be capped/locked, labeled. Photo looking northeast. Recommend cut down vegetation. | | |
| Point ID N-1 | Location ID C-2 |  |
| Date September 26, 2024 | | |
| Description: Erosion gully on side slope, northeast section of Ash Pond C. Photo looking north. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |

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|---|---------------------------|--|
| Point ID L-1 | Location ID C-3 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established on the northeast slope of Ash Pond C. Photo looking north. No issues observed. | | |
| Point ID L-1 | Location ID C-4 |  |
| Date September 26, 2024 | | |
| Description: Minor bare area along the northeast side of Ash Pond C. Photo looking north. Recommend re-seeding bare spots. | | |

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|--|---------------------------|--|
| Point ID J-1 | Location ID C-5 |  |
| Date September 26, 2024 | | |
| Description: Groundwater monitoring well AP-6A found to be capped/locked, labeled and maintained properly. Photo looking north. No issues observed. | | |

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| Point ID H-2 | Location ID C-6 |  |
| Date September 26, 2024 | | |
| Description: Plunge pool energy dissipator at downrain outfall pipes located on north side of Ash Ponds C. Photo looking north. Recommend remove debris and cut down tall vegetation. | | |

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|---|---------------------------|--|
| Point ID H-3 | Location ID C-7 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established along the top and sideslope on the north side of Ash Pond C. Photo looking west. No issues observed. | | |
| Point ID H-3 | Location ID C-8 |  |
| Date September 26, 2024 | | |
| Description: Erosion gully on side slope, northwest section of Ash Pond C. Photo looking south. Recommend repair the soil cover and re-seed for proper vegetative cover. | | |

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| Point ID G-3 | Location ID C-9 |  A photograph showing a rocky channel or outfall area. The foreground is filled with large, grey and tan rocks. Tall, dry, yellowish-brown grasses and weeds are growing along the edges of the channel. In the background, there is a green field and a line of trees under a clear blue sky. |
| Date September 26, 2024 | | |
| Description: Observed tall vegetation growth at plunge pool energy dissipator at down drain outfall channel located on northwest side of Ash Ponds C. Photo looking west. Recommend remove debris and cut down vegetation. | | |
| Point ID H-6 | Location ID C-10 |  A photograph of a rocky channel. The channel is filled with large, grey rocks. A black pipe is visible in the middle ground, partially obscured by the rocks. A person in a yellow safety vest is standing on a grassy slope in the background. The sky is blue with scattered white clouds. |
| Date September 26, 2024 | | |
| Description: Plunge pool energy dissipator at down drain outfall channel located on west side of Ash Ponds C looks in good conditions. No issues observed. | | |

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| Point ID H-6 | Location ID C-11 |  |
| Date September 26, 2024 | | |
| Description: Accumulated debris and tall vegetation at drop inlets on the southwest section of Ash Pond C. Photo looking east. Recommend remove debris and cut down vegetation. | | |

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| Point ID H-6 | Location ID C-12 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established along the west side slope of Ash Pond C. Photo looking south. No issues observed. | | |

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|--|----------------------------|--|
| Point ID I-7 | Location ID C-13 |  |
| Date September 26, 2024 | | |
| Description: Vegetation well established along the top of Ash Pond C. Photo looking northeast. No issues observed. | | |
| Point ID I-8 | Location ID C-14 |  |
| Date September 26, 2024 | | |
| Description: Accumulated debris and tall vegetation at drop inlet on the southwest section of Ash Pond C. Photo looking east. Recommend remove debris and cut down vegetation. | | |

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| Point ID P-3 | Location ID C-15 |  |
| Date September 26, 2024 | | |
| Description: Accumulated debris and high vegetation at drop inlets on the northeast section of Ash Pond C. Photo looking north. Recommend remove debris and cut down vegetation. | | |
| Point ID L-6 | Location ID C-16 |  |
| Date September 26, 2024 | | |
| Description: Groundwater monitoring well AP-8 found to be capped/locked, labeled and maintained properly. Photo looking north. No issues observed. | | |