

2019 VISUAL INSPECTION OF ASH POND EMBANKMENTS IPL PETERSBURG ASH POND SYSTEM

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

ATC PROJECT NO. 170LF00780

DECEMBER 11, 2019

PREPARED FOR:

INDIANAPOLIS POWER & LIGHT COMPANY 6925 NORTH STATE ROAD 57 PETERSBURG, INDIANA 47567

ATTENTION: MR. WILL TEAGUE



December 11, 2019

Mr. Will Teague Senior Scientist Indianapolis Power and Light Company 6925 North State Road 57 Petersburg, Indiana 47567-0436 ATC Group Services LLC

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www.atcgroupservices.com

Re: 2019 Visual Inspection of Ash Pond Embankments IPL Petersburg Ash Basin Pond System Indianapolis Power and Light Company Petersburg Generating Station Petersburg, Indiana ATC Project No. 170LF00780

Dear Mr. Teague:

ATC Group Services LLC (ATC) is pleased to present the findings of the November 6, 2019 Visual Site Inspection of the IPL 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 ash pond embankments inspection was completed by David Stelzer and Juan Carrizo of ATC Group Services LLC (ATC). The weather condition during the inspection was approximately 50°F and sunny. Contained herein is a summary of the engineering observations of the ash pond embankments including condition of the pond side slopes, grading and erosion, vegetation, haul roads, perimeter ditches, downdrain channels, riprap areas, culverts and other adjacent structures. The ash pond system features are highlighted on the attached Site Plan shown in Figures 2 and 3 of this report.

The IPL 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 2019 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 David Stelzer and Juan 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 layout of the ash pond system for the IPL Petersburg station is presented in Figure 2. Ash Ponds A and A' are the only ponds with water in them, the area occupied by Ash Pond D has been repurposed with the construction of a wastewater treatment plant, Ash Pond B is closed, and Ash Pond C is in the closure process as in-place closure.

Engineering observations performed on November 6, 2019 are shown in Figure 3, 2019 Visual Site Inspection Grid Map. ATC visually inspected the embankments for Ash Ponds A, A', C, and D, and found no areas of instability or of concerns to the proper functioning of the ash basin system.

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

Changes in Geometry of Ash Pond

Observed geometry changes during the 2019 Petersburg ash basin embankment inspection consisted mainly of grading measures along the ash pond basins that are closed (Ash Pond B), under closure procedures (Ash Pond C, areas on Ash Pond A), and for the area encompassing the Ash Pond D which has been repurposed for the construction a new wastewater treatment plant and site improvements.

The ash pond descriptions, observations, and recommendations are as follows:

Ash Pond A and A'

Ash Pond A' is approximately 8.1 acres in size, and has a normal water elevation of 432.2. Based on topographic map of the site, the pond depth ranges from elevation 420 to 438. Pond A' discharges flows to Lick Creek via a concrete riser and culvert structure. As part of the closure plans for Ash Pond A, it is being actively filled in with structural fill. The drainage basin to Ash Pond A is approximately 62 acres with approximately 9.5 acres of ponding area remaining at the time of the

inspection site visit. The normal water level is approximately 433.60, and it discharges to Ash Pond A' via culverts. In general, this area has a good soil cover and is well-drained.

- 1. Good vegetation exists along the majority of the west and north slopes of the ponding areas and partial closure area as shown in Figure 3, grid B-13, I-8, and E-12.
- 2. The southern portion of Ash Pond A is being filled in with structural fill as part of closure work as shown in grid locations G-6 and I-11.

Ash Pond B

Ash Pond B is approximately 33.1 acres and has been closed with a geomembrane-composite final cover and does not receive ash sluicing anymore. In general, this area is has a good soil cover and is well-vegetated along the side slopes and top of the former ash pond basin.

- 1. Good vegetation exists along the majority of the basin, including the top of basin, and side slopes as shown in Figure 3, grid locations G-5, H-6, H-7, D-7, C-13, D-12 and F-11.
- 2. At the side slopes along the western, south-eastern, and north there were erosion rills and gullies observed at certain locations as shown in grid B-9, C-8, E-6, E-5, F-5, F-4G-6, H-7, I-11, H-11, E-11, D-12, and C-13.
 - Recommendation: Repair the soil cover and install erosion control mats as needed in areas affected by erosion rills and gullies. Overseed these areas to establish a protective grass cover.

Ash Pond C

Ash Pond C is approximately 45.7 acres and does not receive ash sluicing anymore. In general, this area has a good soil cover and is well-vegetated along the side slopes.

- 1. Good vegetation exists along the side slopes of the basin as shown in Figure 3, grid locations H-1, I-1, G-4, H-6, H-7, and M-5.
- 2. At the side slopes along the western, and north there were erosion rills and gullies observed at certain locations as shown in grid K-1, J-1, H-5, H-6, I-8, and P-3.
 - Recommendation: Repair the soil cover and install erosion control mats as needed in areas affected by erosion rills and gullies. Overseed these areas to establish a protective grass cover.

Ash Pond D

The area for Ash Pond D has been repurposed and does not receive ash sluicing anymore. In general, this area has been paved with asphalt and is now entirely occupied by a wastewater treatment plant and a parking facility.

Minimum and Maximum Depth of Ash Pond System

According to site topographic map, the minimum depth for Ash Ponds A and A' is approximately elevation 420.0 and the maximum depth is elevation 440.0,

Ash Pond System Storage Volume

Ash Ponds A and A' have a combined storage capacity of approximately 330 acre-feet.

Structural Integrity

All ash pond embankment slopes appear to be stable with no visual indications or signs of sloughing or subsidence were detected during the 2019 visual inspection.

Stability and Operation

The ash pond embankments are generally in good condition and the slopes are well vegetated in most places. No 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 2019 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,

ATC Group Services LLC

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Juan D. Carrizo, P.E., CPM Senior Project Engineer

Jand Stofn

David Stelzer, P.E., PhD. Senior Project Manager

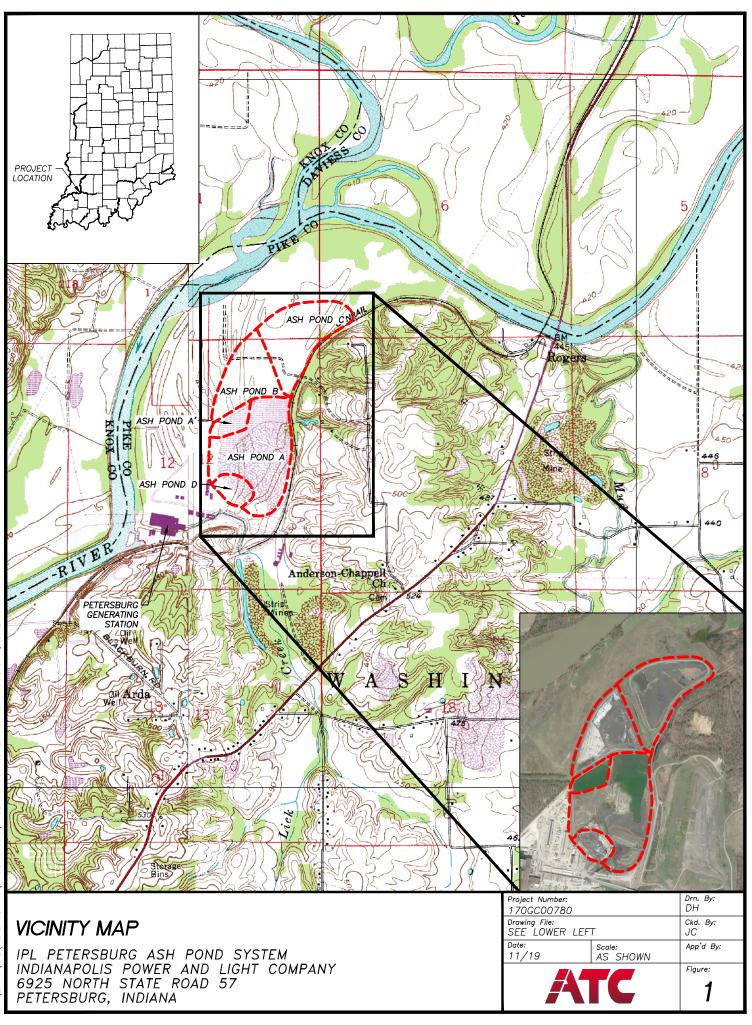
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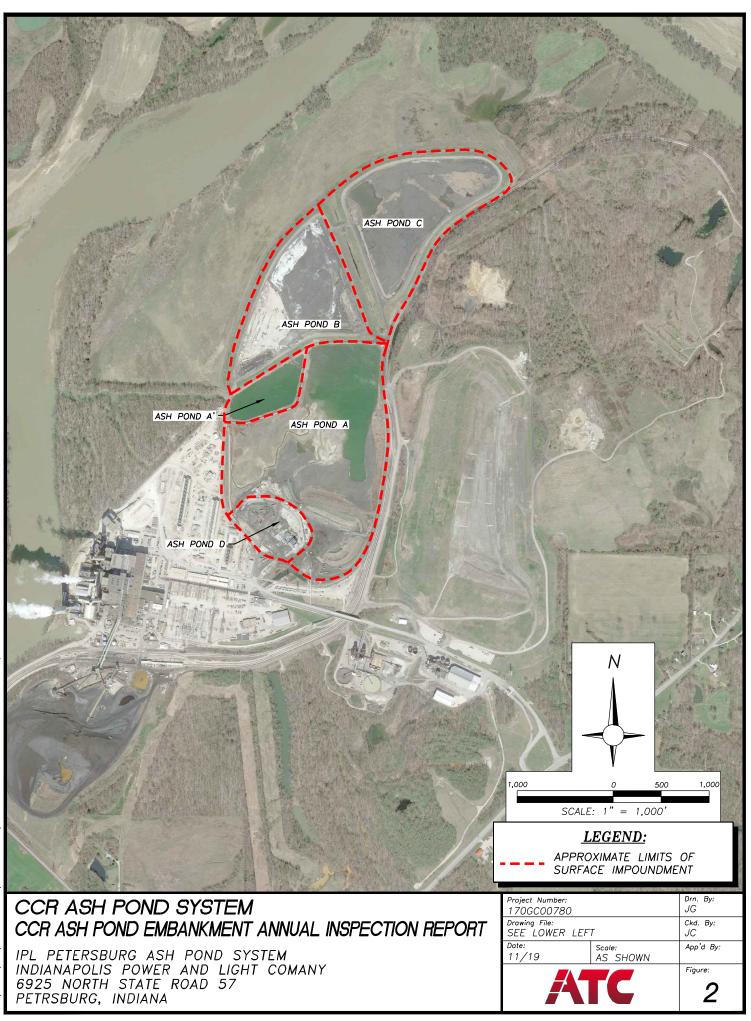
Will Teague (1) Erwin Leidolf (1)

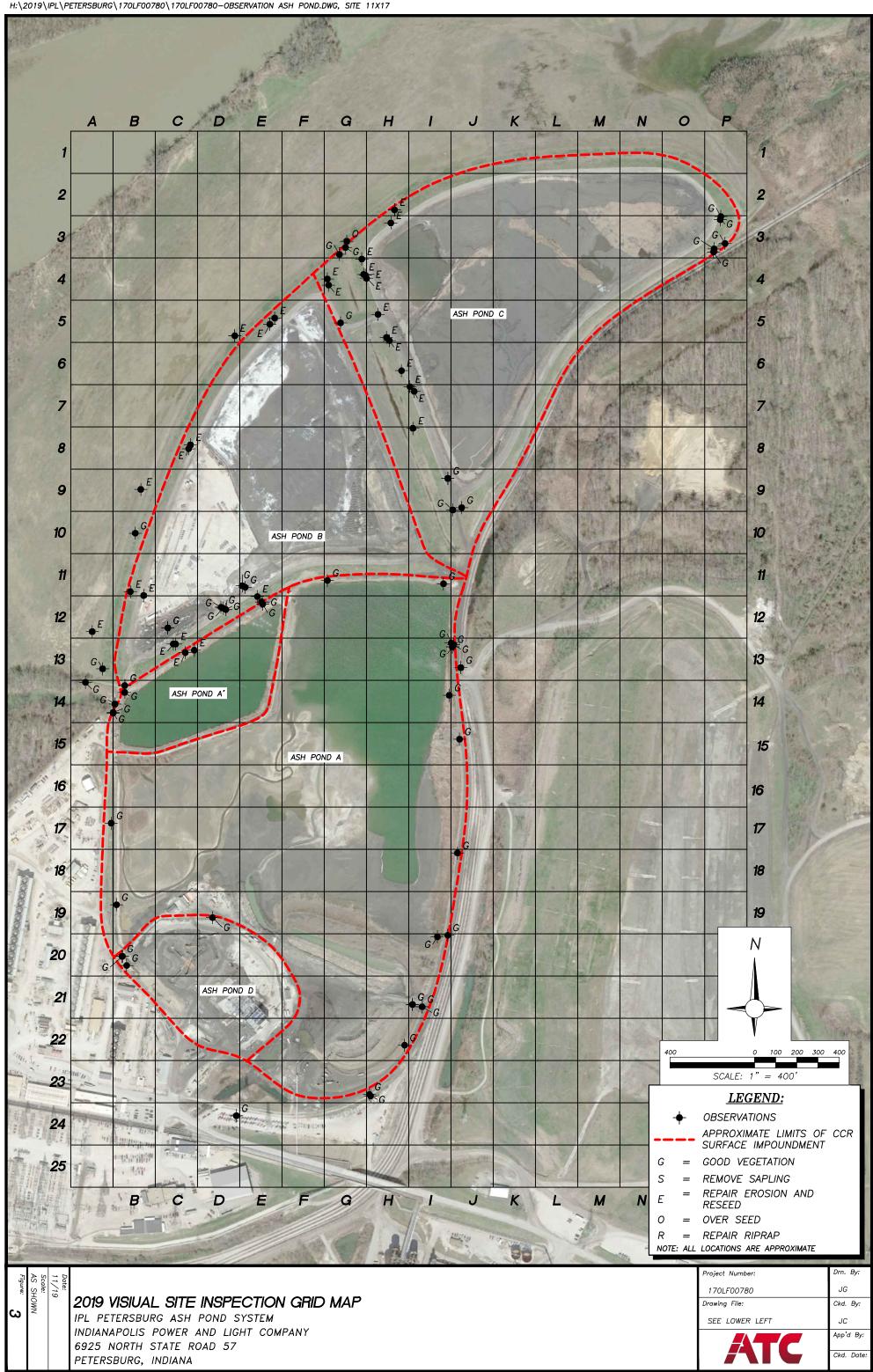
Attachments:

Figure 1	Vicinity Map
Figure 2	CCR Disposal Facilities
Figure 3	Visual Site Inspection Grid Map

Attachment A: Dam Inspection Report







Attachment A: Dam Inspection Report

SUGGESTED DAM INSPECTION REPORT (Refer to pages 5 and 6 for instructions.)

Name of Profession Juan D. Ca		Inspection						sional Licen 00037	se No. (I	ndiana)	
Business Address 7988 Cer		re, Suite 100, Ind	ianapolis IN	l 46256-338	1			Phone: (day (evening))	- <u>579</u> -	- <u>4016</u>
Company Name A	TC Group Ser	vices, an Atlas C	ompany								
INSPECTION PRI Yes 🛛 No 🗇 Cor		Reviewed all perti	nent technica	al documenta	tion rela	ted to this	dam an	d site in the	State's	and the (Owner's files:
MULTIDISCIPINAF properly inspect thinhydrologic, structu	is dam and app	urtenant works. Te	chnical discip		-						-
Dam Name IPL Petersburg /	Ash Pond A				Qu	iad. Peters	bura	Date of In	spection	11/0	6 / 2019
State Dam ID N/A		inapproved see pg	. 6) Count Pike	у	Sec. 13	T. 	R.	Last In:	spection		6 / 2018
Owners Name Indianapolis Pov	ver & Light)wner's Pl 812)60		
Address/Zip Code 6925 North State	e Road 57, Pe	tersburg IN 4756									
Contact's Name Wil Teague				(evening)	812	601 - 582 -	7115 9797	Spillway Top 5) Bot.	50	Ft. FBD. N/A
Hazard Low	Drainage Area 0.16 MI ²	Surface Area 81 AC	Height 20 FT	Crest Length 6900	FT Cres	t Width 20	FT Inlet	Below Crest 10 F	Slope	: Up 2.5 Down 2	
FIELD CONDITION Water Level - Be Ground Moisture	low Dam Crest Condition: Dry	20		_Other	□ Seepa	ageWeirs	s	DRAWDON	I None	CTURE]
Comments											J
A UPSTREAM GOOD ACCEPTABLE DEFICIENT POOR	Scarps	MS NOTED: ⊠ (☐ (A-4) Cracks-with des ☐ (A-9) Anin :	n Displaceme	□ (A-2) Ripra nt □ (A-5) □ (A-10) Ti	Sinkhole	□ (A-6	6) Appear	d, Weathere s Too Steep 11) Other <u>—</u>			e Erosion-with ions or Bulges
B CREST GOOD ACCEPTABLE DEFICIENT POOR	☐ (B-5) Sin Drainage	kholes ☐ (B-6) ☐ (B-10) Trees,	Not Wide End		7) Low Ai		-3) Erosic	on 🗍 (B-4) gnment 🗍		rith Displad dequate S	

Spillway Width refers to the open channel (typically the emergency or auxiliary spillway) at the control section. *Ft. FBD.* refers to the vertical distance from the emergency (auxiliary) spillway control section to the lowest point of the crest of the dam. *Inlet Below Crest* refers to the vertical distance from the inlet of the principal spillway to the crest of the dam.

DAM NAME IPL Pete	ersburg Ash Pond A	STATE DAM I.D. <u>_N/A</u>	DATE <u>12 /09 /</u> 19
CDOWNSTREAM SLOPE GOOD ACCEPTABLE DEFICIENT POOR		stock Damage	□ (C-4) Cracks with □ (C-8) Slide
D SEEPAGE GOOD (NONE) X ACCEPTABLE D DEFICIENT D POOR	□ (D-4) Seepage Exits at Point Source □ (D-5) See □ (D-7) Seepage Clear/Muddy [DRAIN OUTFALLS SEENNoYes □ (D-4)	rated Embankment Area (D-3) Seepage B page Area at Toe (D-6) Flow Adjacent to B) Flow Clear/Muddy (D-9) Dry/Obstructe rescribe location of drains and indicate amoun	ed]
E PRINCIPAL SPILLWAY GOOD X ACCEPTABLE DEFICIENT DEFICIENT	DESCRIPTION: PROBLEMS NOTED: ⊠ (E-1) None □ (E-2) Dete Deficiency □ (E-6) Stilling Basin Inadequacies □ Comments:	rioration ☐ (E-3) Separation ☐ (E-4) Cra (E-7) Trash Rack ☐ (E-8) Other	acking 🛛 (E-5) Inlet, Outlet
F AUXILIARY SPILLWAY GOOD Image: Comparison of the second	DESCRIPTION: PROBLEMS NOTED: (F-1) None (F-2) No (F-4) Crack with Displacement (F-5) Appears t (F-7) Inadequate Freeboard (F-8) Flow Obstrue (F-10) Other Comments:	o be Structurally Inadequate	rs too Small
G MAINTENANCE AND REPAIRS GOOD ACCEPTABLE DEFICIENT POOR □		s, Tall Grass, on Upstream Slope, Crest, Dow n Slope	am Slope, Crest, Down-
		CONDITIONS	

Based on this inspection and recent file review, the overall surficial condition is determined to be: (H-1) Satisfactory 🗖 (H-2) Fair □ (H-3) Conditionally Poor □ (H-4) Poor □ (H-5) Unsatisfactory

IMPORTANT: IF THIS RATING IS DIFFERENT THAN PREVIOUS IDNR RATING, PLEASE ATTACH EXPLANATION AND REASONS FOR CHANGE ON PAGE 4.

<u>STATE DAM I.D. N/A</u>

RECOMMENDATIONS AND ITEMS REQUIRING ACTION BY OWNER TO IMPROVE THE SAFETY OF THE DAM

(1) Provide Additional Erosion Protection: Crest section is used as an gravel access road: add gravel material to elir	minate ruts.
□ (2) Mow:	
(3) Clear Trees and/or Brush From:	
(4) Initiate Rodent Control Program and Properly Backfill Existing Holes:	
□ (5) Repair:	
(6) Provide Surface Drainage For:	
□ (7) Monitor:	
(8) Other:	
(9) Other: ENGINEERING-EMPLOY AN ENGINEER EXPERIENCED IN DESIGN AND CONSTRUCTION OF DAMS TO:	· · · · · · · · · · · · · · · · · · ·
(Plans & Specifications must be approved by State prior to construction.)	
□ (10) Prepare Plans and Specifications for the Rehabilitation of the Dam:	
□ (10) Prepare hans and Specifications for the Kenabilitation of the Dam	
(12) Perform a Geotechnical Investigation to Evaluate the Stability of the Dam:	
□ (13) Perform a Hydrologic Study to Determine Required Spillway Size:	
(14) Prepare Plans and Specifications for an Adequate Spillway:	
□ (15) Set up a Monitoring Program:	
□ (16) Refer to Unapproved Status of Dam:	
(17) Develop an Emergency Action Plan:	
□ (18) Other:	
□ (19) Other:	
Recommended schedule for upgrades/comments (Please prioritize and note importance of each item.) (1). As soon as possible.	
Photographs Attachments	
ENGINEER'S INSTRUCTION Instructed owner on the safety concerns with the structure and how to monitor and inspect the o	lam and appurtenant
works in the interim period between the regulatory two-year inspections. Yes $old X$ No \Box	
Comment	
\mathcal{N}	, = /= = /= = - =
Professional Engineer's Signature	_{Date} 12/09/2019
Reviewed By	Date
Owner/Owner's Representative	

EXPLANATION FOR CHANGE IN RATINGS (Describe all repairs, upgrades or improvements made if dam conditions and rating have improved since the last inspection. Describe deteriorating conditions if ratings have worsened.)

REASONS FOR RATING CHANGE: No change.

PREVIOUS RECOMMENDATIONS FOR MAINTENANCE, REPAIRS, AND UPGRADES:

HAVE THEY BEEN PERFORMED X YES D NO (If no, please explain:)

Supporting Documentation

Photographs
Attachments
Calculations
Drawings
Other

Comments:

INSTRUCTIONS FOR COMPLETING DAM VISUAL INSPECTION REPORT

1. Complete all items that are applicable; if not applicable, write in "N/A". For concrete dams, complete all applicable items and use "comments" section to cover items not included in the check boxes. Also indicate that the dam is concrete in the comments section.

2. Use page 6 to determine ratings of each dam component (items A through G) and for Overall Conditions (Item H).

3. Please write legibly and concisely.

4. Inspector must be knowledgeable with the type of dam, materials, and components being inspected. If not, qualified assistance shall be engaged.

5. The inspector shall review the dam owner's and IDNR project files prior to the inspection. Previous inspection reports shall be closely reviewed for previous problems and deficiencies.

6. If the ratings of the components (items A through G) or the Overall Conditions (item H) of the dam have changed since the last inspection, please complete page 4. If a rating has improved, dam repairs, improvements, analyses, or maintenance must have been performed and documented on page 4.

7. For a dam to have a satisfactory "Overall Conditions" rating, it must have no existing or potential dam safety deficiencies recognized. Safe performance is expected under all anticipated loading conditions, including infrequent hydrologic events (PMP for high hazard dams) and seismic events. The dam owner's project files must contain hydrologic and hydraulic analyses of the dam and its spillways to verify performance. The files must also contain slope stability analyses to verify embankment stability under full reservoir conditions and rapid-draw down conditions. The dam and all of its components must meet current IDNR and design standards. "Normal" deficiencies such as minor erosion, minor seepage, or normal concrete aging may not make a dam unsatisfactory or unacceptable. For a satisfactory "Overall Conditions" rating to be assigned, items A through G generally should all have a "good" rating; however, in some cases an "acceptable" rating may be satisfactory if the "Problems Noted" are minor, or "normal" conditions, such as minor erosion rills, small puddles on crest, or if grass needs mowed, but is in good condition.

8. An inspection report form must be submitted to IDNR along with a formal technical inspection report as described in Chapter 4.0 of Part 3 of the Indiana Dam Safety Inspection Manual.

9. Please sign and date this page in the space below to verify that you have read and understand these instructions.

Inspector's Signature:

Hamizo

Date: 12/09/2019

GOOD	ACCEPTABLE		DEFICIENT		POOR	
good appearance, and conditions observed in this area do not appear to threaten the safety of the dam. tained, surfaces rutted, spalled, condition. Condition		ross-section is main- v be irregular, eroded, therwise not in new is in this area do not hreaten the safety of	Continued deterioration and/or unusual loading may threaten the safety of the dam.		Conditions observed in this area appear to threaten the safety of the dam. Conditions observed in this area are unacceptable.	
	со	NDITIONS OBSERVED	- APPLIES TO SEEPA	GE		
GOOD (NONE)	ACCEPTABLE		DEFICIENT		POOR	
No evidence of uncontrolled seepage. No inexplained increase in flows from de- igned drains. All seepage is clear. Seep- ige conditions do not appear to threaten he safety of the dam.	the drain outfalls, or o No unexplained inc designed drains. A Seepage conditions	ts at areas other than ther designed drains. rease in flows from Il seepage is clear. observed do not cur- aten the safety of the	Excessive seepage a than drain outfalls a drains. Seepage nee Increased flow and/c ration in seepage con the safety of the dam	and other designed eds to be evaluated. or continued deterio- iditions may threaten	Excessive seepage conditions observe appear to threaten the safety of the dar and is unacceptable. Examples: 1) De signed drain or seepage flows have in creased without increase in reservoir leve 2) Drain or seepage flows contain sed ment. i.e., muddy water or particles in js samples. 3) Widespread seepage, cor centrated seepage or ponding appears to threaten the safety of the dam.	
	CONDITIONS	OBSERVED - APPLIE	S TO MAINTENANCE	AND REPAIR		
GOOD	ACCEPTABLE		DEFICIENT		POOR	
Dam appears to receive effective on-going naintenance and repair, and only a few ninor items may need to be addressed.		ive maintenance, but tems need to be ad- epairs are required.	Level of maintenanc significant improveme be required. Continue nance may threaten t	ent. Major repairs may ed neglect of mainte-	Dam does not receive adequate mainte nance. One or more items needing main tenance or repair has begun to threate the safety of the dam. Level of mainte nance is unacceptable.	
		OVERALL C	ONDITIONS			
SATISFACTORY - No existing or potential dam safety deficiencies recognized. Safe performance is expected under all antici- pated loading conditions, including such events as infrequent hydrologic and/or seismic events. Project Files contain nec- essary hydrologic, and other engineering calculations to verify dam safety and performance. FAIR - No existing dam safety deficien- cies are recognized for normal loading conditions. Infrequent hydrologic and/or		seismic events would probably result in a dam safety deficiency. CONDITIONALLY POOR - A potentia safety deficiency is recognized for un- usual loading conditions which may realis- tically occur during the expected life of the structure. CONDITIONALLY POOR may also be used when uncertainties exist as to critical analysis parameters which iden- tify a potential dam safety deficiency, further investigations and studies are necessary.		 POOR - A potential dam safety deficiency is clearly recognized for normal loading conditions. Immediate actions to resolve the deficiency are recommended; reser- voir restrictions may be necessary until problem resolution. UNSATISFACTORY - A dam safety defi- ciency exists for normal conditions. Im- mediate remedial action is required for problem resolution. 		
	HAZ	ARDCLASSIFICATION	IS OF DAMS (STRUCTL	JRE)		
LOW HAZARD- A structure the failure of which may damage farm buildings, agri- cultural land, or local roads		SIGNIFICANT HAZARD- A structure the failure of which may damage isolated homes and highways, or cause the temporary interruption of public utility services.		HIGH HAZARD-A structure the failure of which may cause the loss of life and serious damage to homes, industrial and commercial buildings, public utilities, major highways, or railroads.		
	ι	JNAPPROVEDS	STATUS OF DAN	1		

If your dam is indicated to be unapproved, it is requested that your engineer contact the Indiana Department of Natural Resources,

approval. The fact that the dam is inspected under the Regulation of Dams Act (IC 14-27-7.5) in no way alters the illegal status of

the structures.

H:\2019\IPL\PETERSBURG\170LF00780\170LF00780-PHOTOLOC-ASH POND.DWG, ASHBASIN

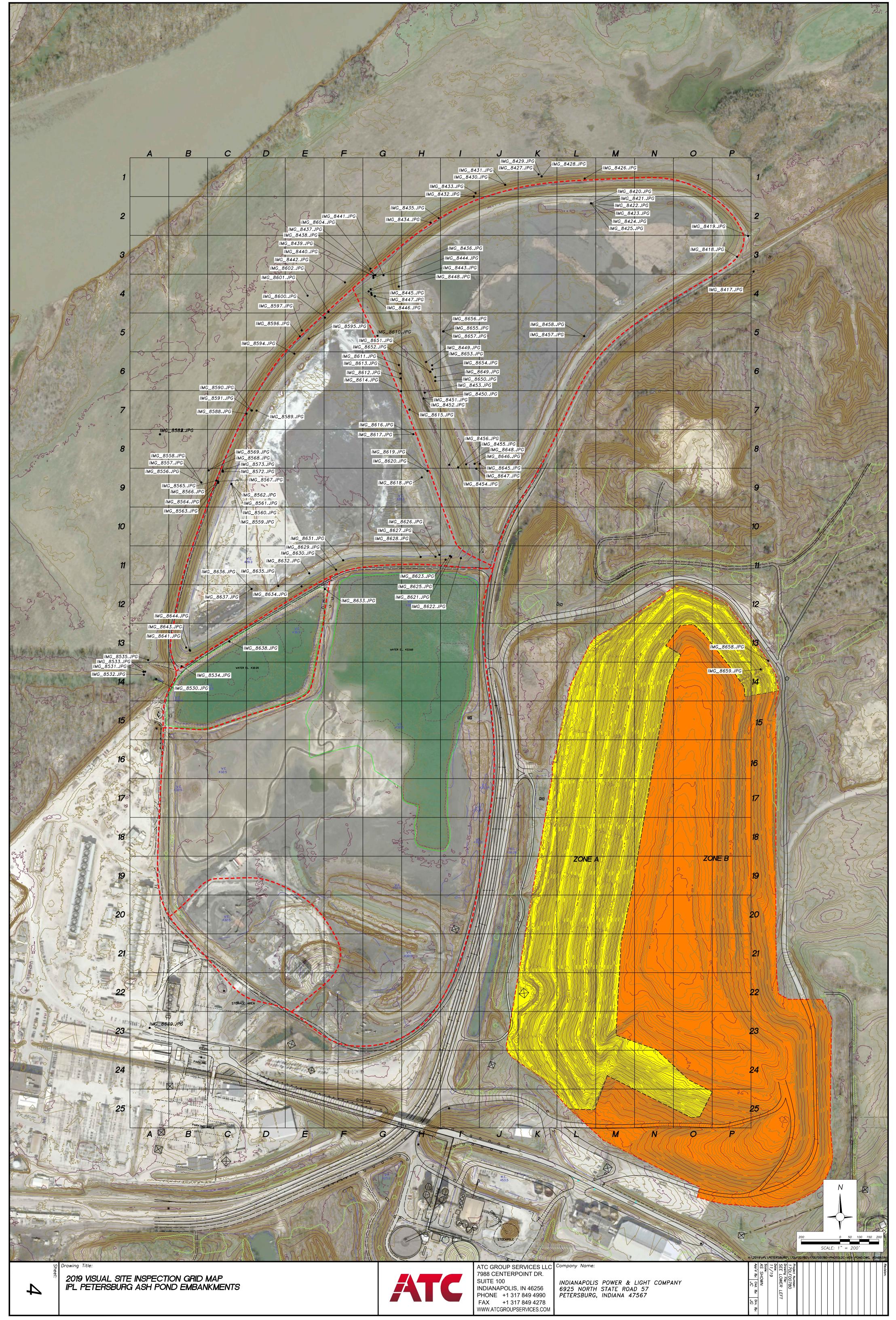


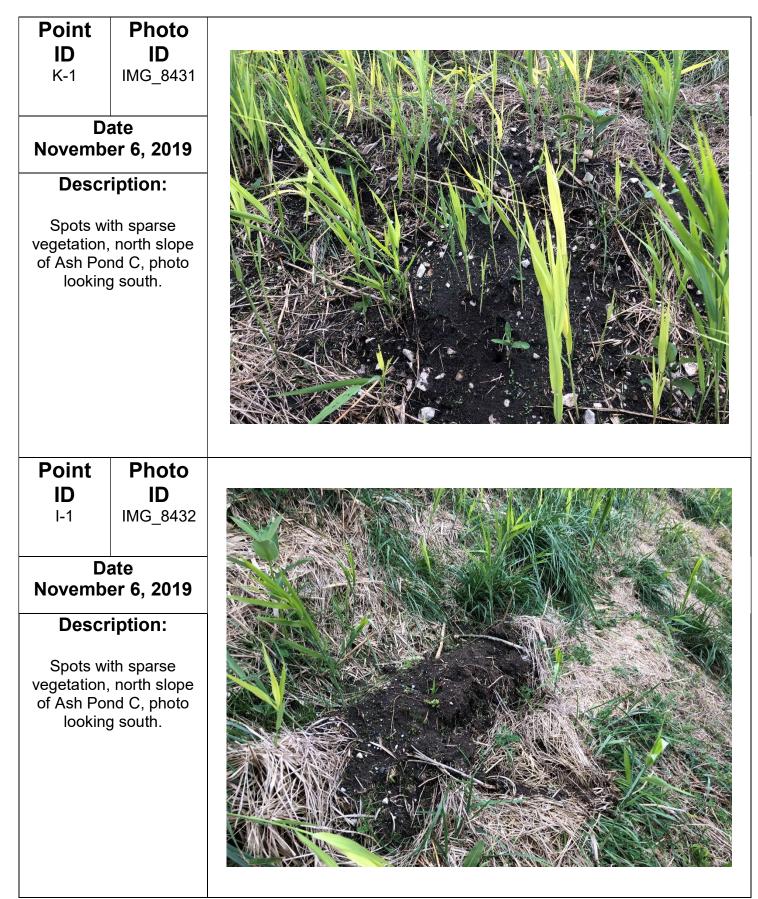
Table #1. List of Observation Photographs and Description of Ash Ponds Conditions

Photo ID	Grid ID	Description
IMG 8417	P-3	Standing water at perimeter ditch along southeast slope of Ash Pond C, photo looking south.
IMG_8418	P-3	Standing water at perimeter ditch along southeast slope and service road at Ash Pond C, photo looking north.
IMG_8419	P-3	Well established grass cover, north slope of Ash Pond C, photo looking south.
IMG_8420	L-1	Animal burrow, north slope of Ash Pond C, photo looking south.
IMG_8426	L-1	Animal burrow, north slope of Ash Pond C, photo looking south.
IMG_8427	K-1	Spots with sparse vegetation, north slope of Ash Pond C, photo looking south.
IMG_8431	K-1	Spots with sparse vegetation, north slope of Ash Pond C, photo looking south.
IMG_8432	I-1	Spots with sparse vegetation, north slope of Ash Pond C, photo looking south.
IMG_8433	I-1	Well established grass cover, north slope of Ash Pond C, photo looking north.
IMG_8434	H-2	Ruts forming along maintenance road, northwester section of Ash Pond C, photo looking north.
IMG_8436	G-4	View of riprap channel along power line corridor, in good condition, photo looking southeast.
IMG_8437	G-4	View of riprap basin energy dissipator at north end of power line corridor, in good condition, photo looking northwest.
IMG_8438	G-4	View of riprap channel at north end of power line corridor, in good condition, photo looking north.
IMG 8439	G-4	Erosion occurring adjacent to north end of riprap channel along at power line corridor, photo looking north.
IMG_8441	G-4	Erosion occurring adjacent to north end of riprap channel along at power line corridor, photo looking north.
IMG_8442	G-4	Animal burrow, north slope of Ash Pond C, photo looking south.
IMG_8443	G-4	Sparse vegetation at north side of drainage swale along power line corridor between Ash Pond B and C, photo looking north.
IMG_8447	G-4	Sparse vegetation along riprap channel within power line corridor, north side-slope of Ash Pond B, photo
_	U-∓ H-7	looking northwest.
IMG_8450 IMG 8453	H-7 H-7	Well established vegetation along power line corridor between Ash Pond B and C, photo looking north. Well stablished vegetation on northern side slope of Ash Pond B along drainage swale at power line corridor,
IMG_8457	M-5	photo looking northwest. Eastern sideslopes of Ash Pond C, and perimeter drainage swale with well stablished vegetation, road section in good condition, photo looking south
IMG_8458	M-5	in good condition, photo looking south. Eastern sideslopes of Ash Pond C, and perimeter drainage swale with well stablished vegetation, road section is good condition, photo looking parth
IMG 8534	A-14	in good condition, photo looking north. Ash Pond A outfall pipe at Lick Creek in good conditon, photo looking east.
IMG_8534 IMG_8535	A-14 A-13	Ash Pond A outrail pipe at Lick Creek in good condition, photo looking east.
IMG_8556	B-9	Erosion gully formed along western slope of Ash Pond C, photo looking southwest.
IMG 8559	B-9	Erosion gully formed along western slope of Ash Pond C, photo looking southwest.
IMG 8563	B-9	Erosion gully formed along western slope of Ash Pond C, photo looking southwest.
IMG 8567	C-9	Erosion rills formed along western slope of Ash Pond C, photo looking southwest.
IMG 8568	C-9	Erosion gully formed along western slope of Ash Pond C, photo looking southwest.
IMG 8572	C-8	Erosion gully formed along western slope of Ash Pond C, photo looking southwest.
IMG_8584	C-8	Erosion rills formed along western slope of Ash Pond B, photo looking east.
IMG_8590	D-7	Well established grass cover, north slope of Ash Pond B, photo looking south.
IMG_8591	D-7	Well established grass cover, north slope of Ash Pond B, photo looking north.
IMG_8594	E-6	Spots with sparse vegetation, north slope of Ash Pond B, photo looking northwest.
IMG_8596	E-5	Erosion rills formed along western slope of Ash Pond B, photo looking west.
IMG_8597	E-5	Erosion gully formed along western slope of Ash Pond B, photo looking east.
IMG_8600	F-5	Erosion gully formed along western slope of Ash Pond B, photo looking east.
IMG_8602	F-4	Erosion gully formed along western slope of Ash Pond B, photo looking east.
IMG_8604	G-3	Erosion gullies formed along western slope of Ash Pond B, photo looking east.
IMG_8610	G-5	Downdrain inlets at north section of Ash Pond B, good condition, photo looking west.
IMG_8611	G-6	Erosion rills formed along eastern slope of Ash Pond B, photo looking northeast.
IMG_8612	G-6	Erosion rills formed along eastern slope of Ash Pond B, photo looking northeast.
IMG_8613	G-6	Erosion rills formed along eastern slope of Ash Pond B, photo looking northeast.
IMG_8614	G-6	Erosion rills formed along eastern slope of Ash Pond B, photo looking northeast.
IMG_8615	H-7	Erosion rills formed along eastern slope of Ash Pond B, photo looking northeast.
IMG_8617 IMG 8620	H-8 H-9	Erosion gully formed along eastern slope of Ash Pond B, photo looking south. Downdrain inlets at middle section of Ash Pond B, good condition, photo looking west.
_	I-11	Erosion rills, sparse vegetation at southeast corner of Ash Pond B, photo looking southeast.
IMG_8621 IMG 8622	I-11	Erosion rills, sparse vegetation at southeast corner of Ash Pond B, photo looking southeast.
IMG_8623	I-11	Erosion gullies formed along southern slope of Ash Pond B, sparse vegetation, photo looking south.
IMG_8625	I-11	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG 8626	H-11	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG 8627	H-11	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG 8628	H-11	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG 8630	F-11	View of Ash Pond A', southern slope of Ash Pond B, vegetation is well established, photo looking southwest.
IMG_8631	F-11	View of Ash Pond A, southern slope of Ash Pond B, vegetation is well established, photo looking southeast.
IMG_8632	G-11	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG_8633	E-12	Animal burrow, southern slope of Ash Pond B, photo looking south.
IMG_8634	E-12	Erosion gullies formed along southern slope section of Ash Pond B, photo looking south.
IMG_8635	D-12	Downdrain inlets at southern section of Ash Pond B, good condition, photo looking west.
IMG_8637	D-12	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG_8638	C-13	Erosion gullies formed along southern slope of Ash Pond B, photo looking south.
IMG_8641	B-13	Ash Pond A' outfall weir structure and pipe, in good condition, photo looking south. Eastern section, Ash Pond A', vegetation is well stablished along north and east sides, photo looking
IMG_8642	F-4	southeast.
IMG_8643	B-13	Middle section of Ash Pond A', vegetation is well stablished along north and south sides, photo looking south. Well stablished vegetation along southern side of Ash Pond B, and view of north section of Ash Pond A, photo
IMG_8644 IMG 8646	B-13 I-8	looking northeast. Plastic Cap (HDPE) to 18-inch downdrain pipe at Ash Pond C is out of place, photo looking north.
-	I-0 I-9	Existing 18-nch downdrain pipe missing plastic cap, southern section of Ash Pond C, photo looking south.
IMG 8647		
IMG_8647 IMG_8649	H-6	Erosion gully formed along southwestern slope of Ash Pond C, photo looking south
IMG_8647 IMG_8649 IMG_8650	H-6 H-6	Erosion gully formed along southwestern slope of Ash Pond C, photo looking south. Erosion gully formed along southwestern slope of Ash Pond C, photo looking south.

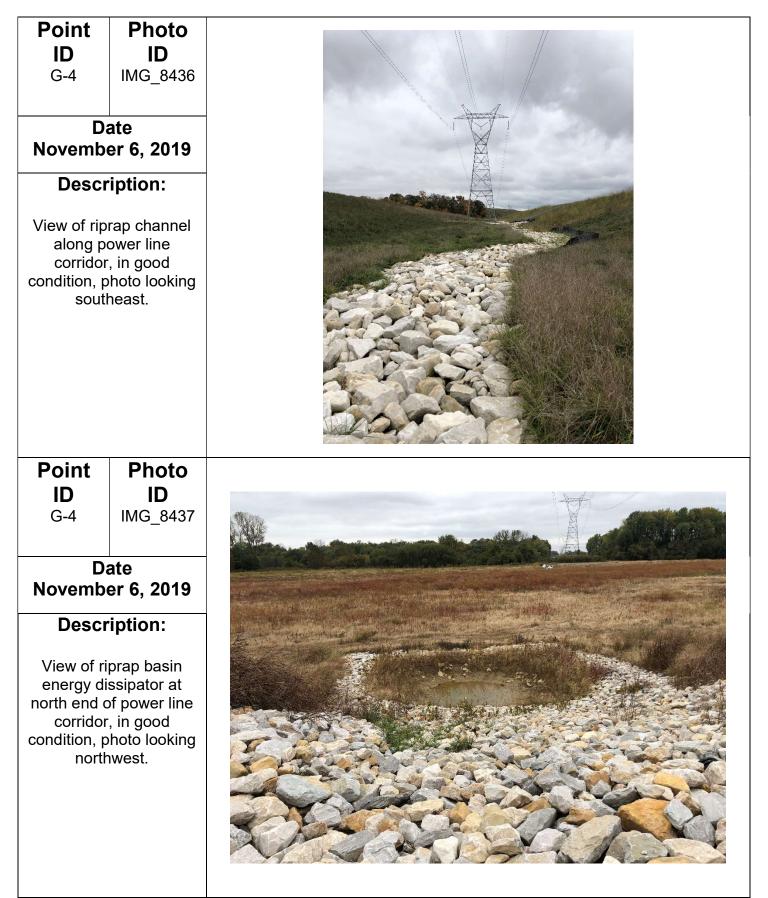
Grid ID P-3	Photo ID IMG_8417
	ate er 6, 2019
Standing perimeter southeast s Pond C, ph	iption: g water at ditch along slope of Ash noto looking uth.
Novembe Descr Standing perimeter southeast service ro Pond C, ph	Photo ID IMG_8418 ate er 6, 2019 iption: g water at ditch along slope and bad at Ash noto looking rth.

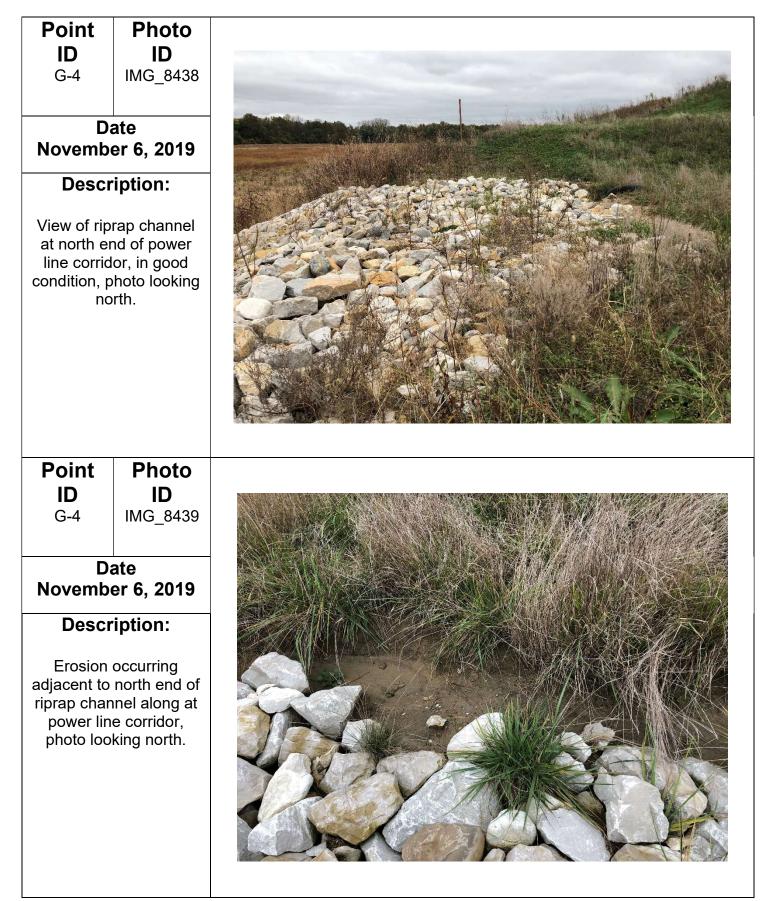


ID L-1	Photo ID IMG_8426
	ate er 6, 2019
Animal bu slope of As	iption: rrow, north sh Pond C, king south.
Point ID K-1	Photo ID IMG_8427
	ate er 6, 2019
Descr	iption:
	th sparse north slope nd C, photo

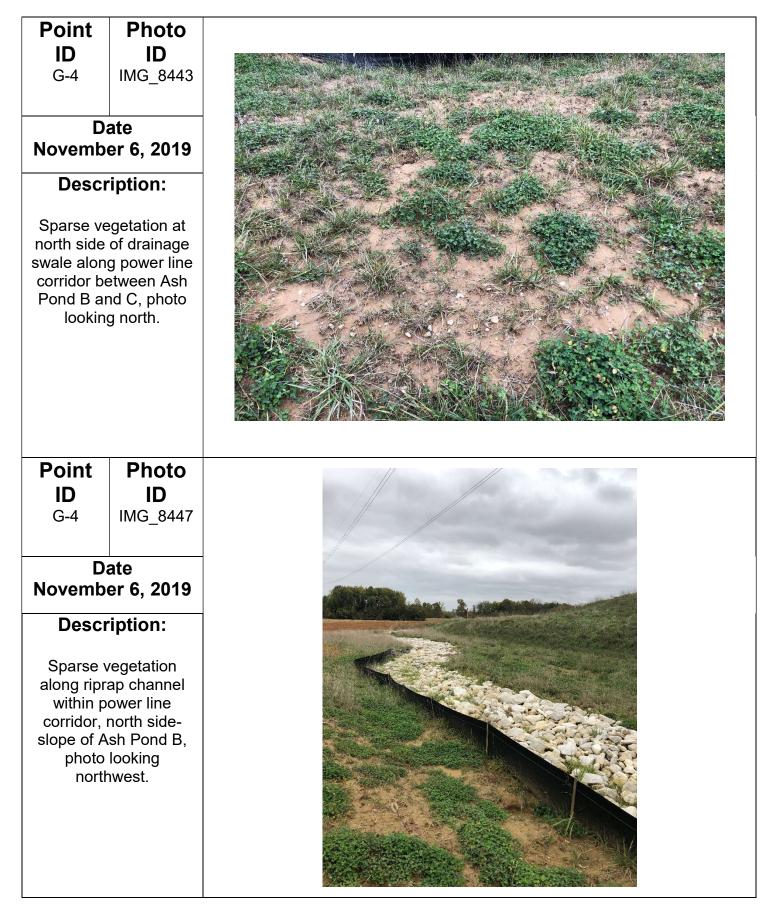


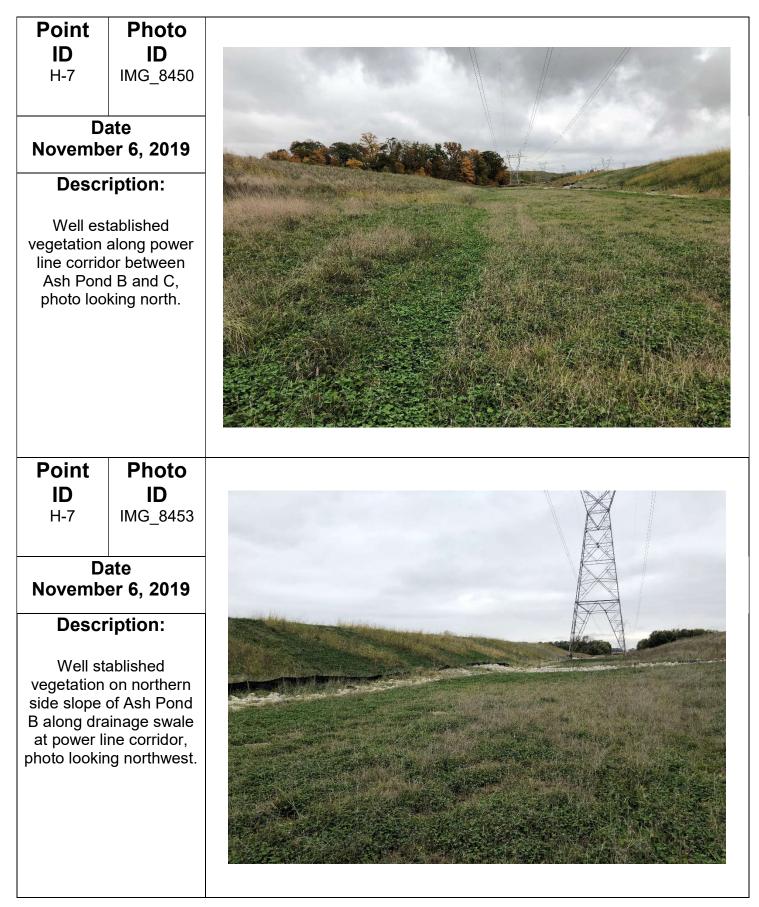
ID	hoto ID G_8433	
Date November 6,	, 2019	NAME
Descriptio	on:	
Well established cover, north slo Ash Pond C, r looking nor	ope of photo	
ID	hoto ID G_8434	
Date November 6,	, 2019	
Descriptio	on:	
Ruts forming a maintenance northwester sec Ash Pond C, p looking nor	road, ction of ohoto	

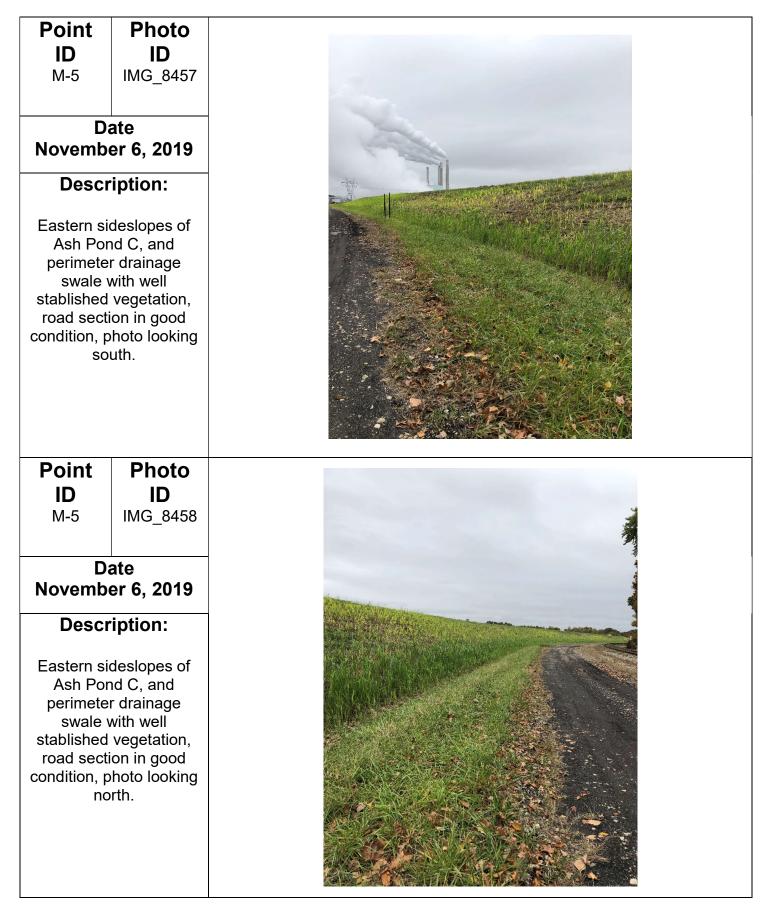


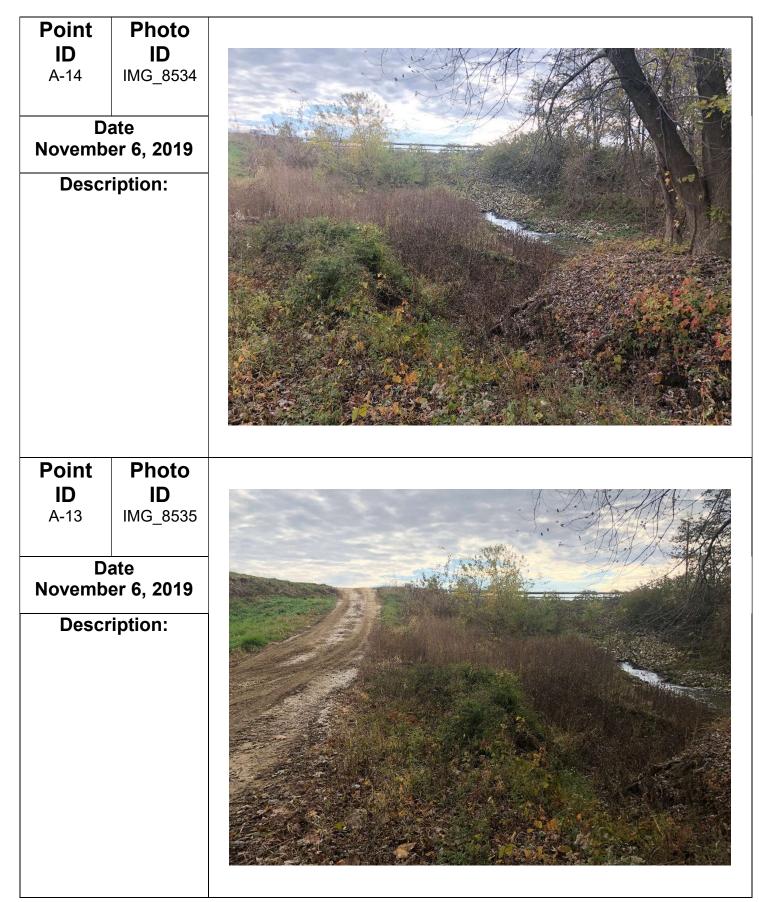




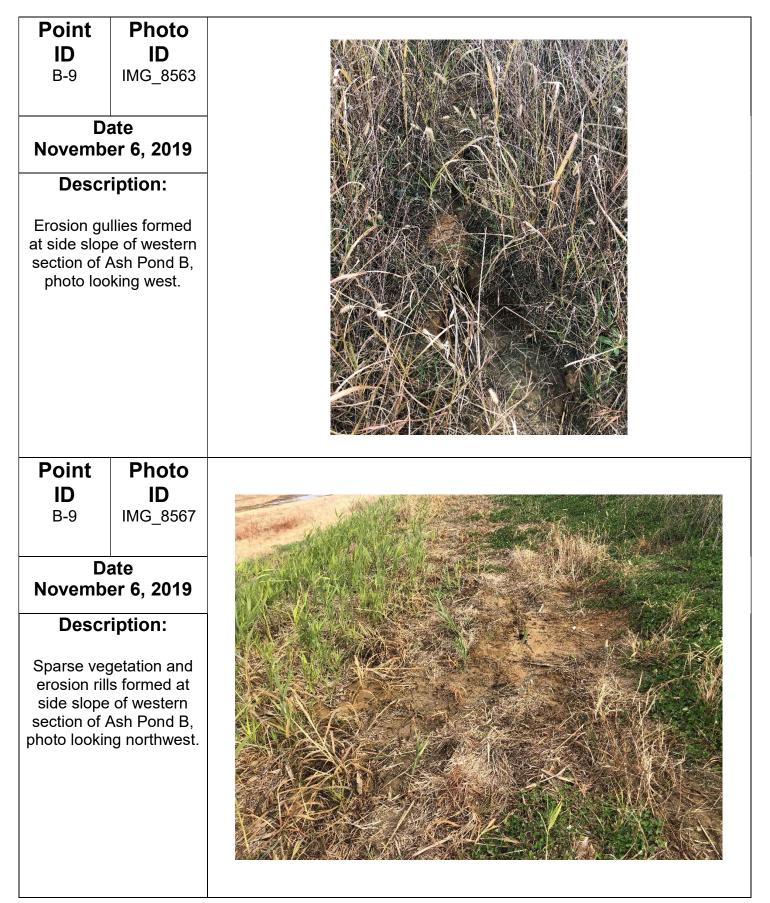


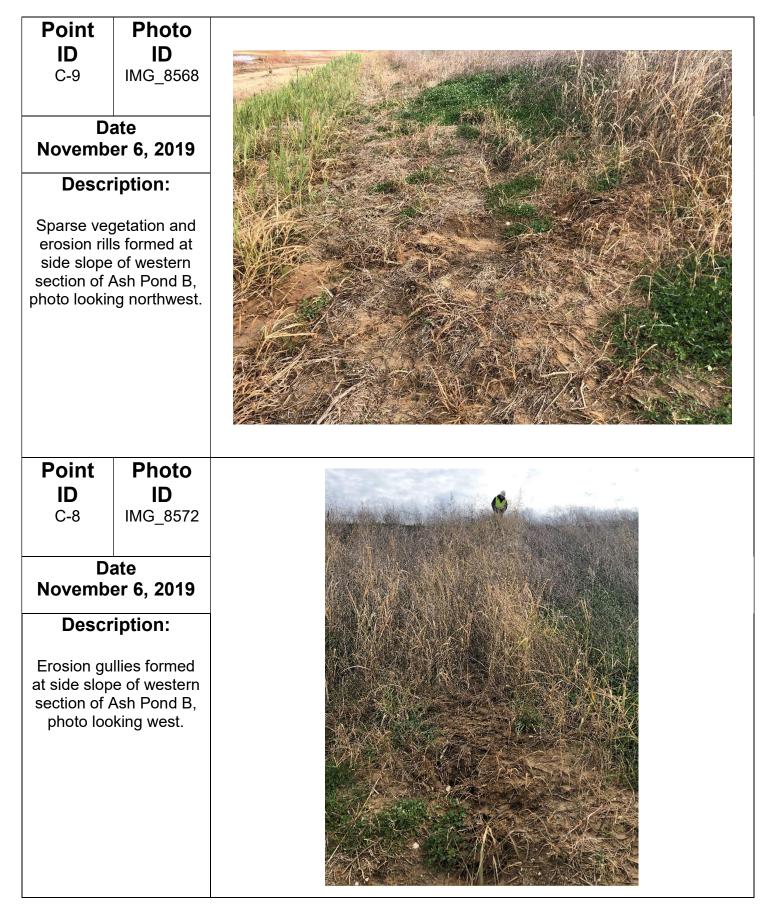








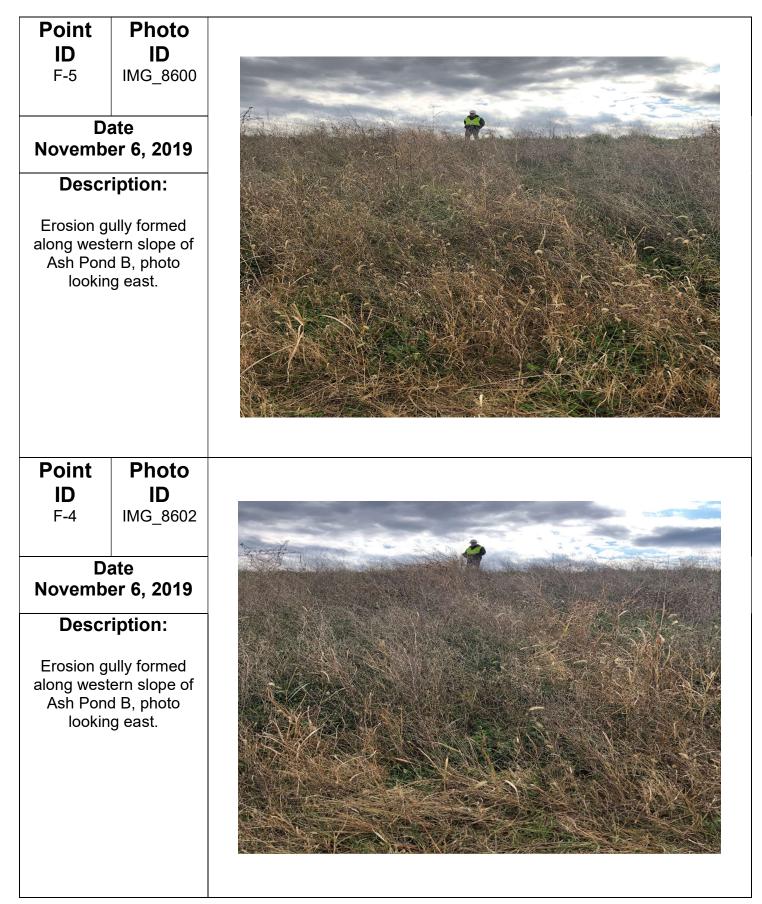


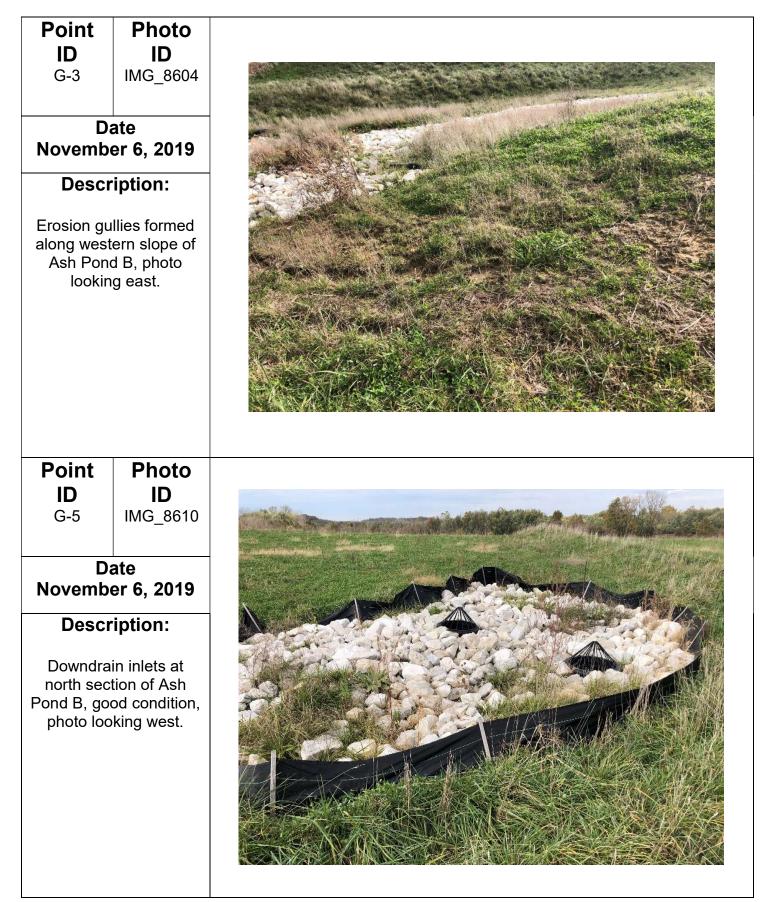


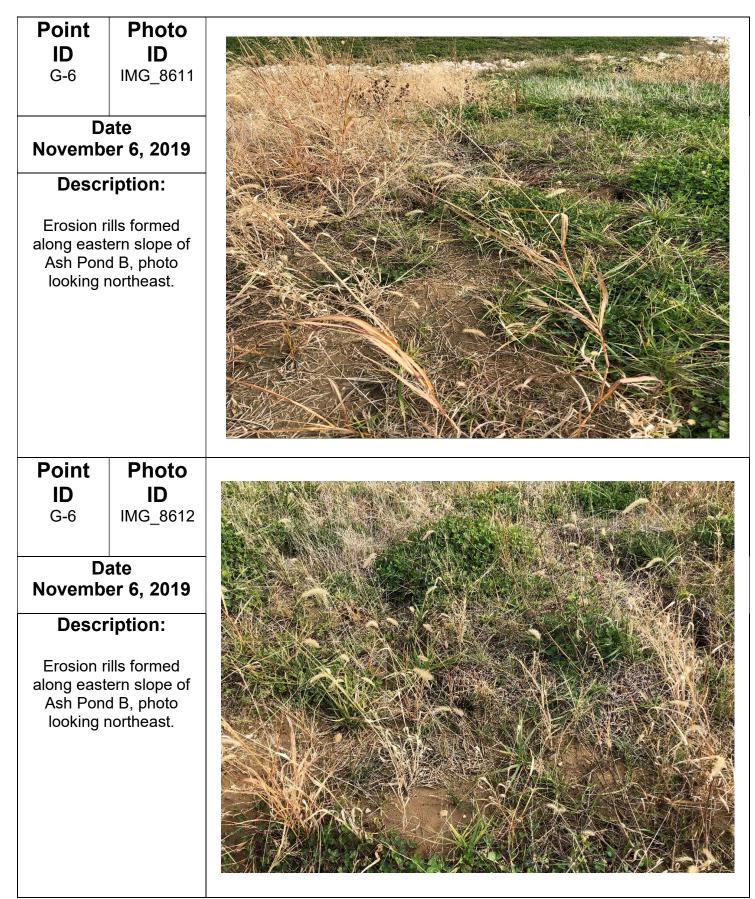


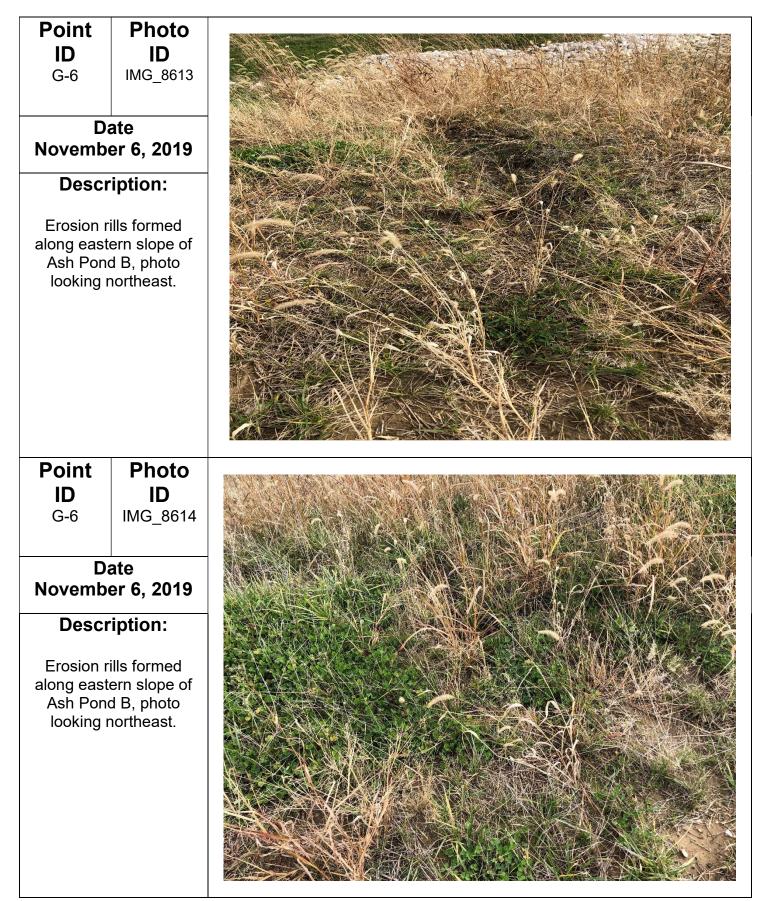


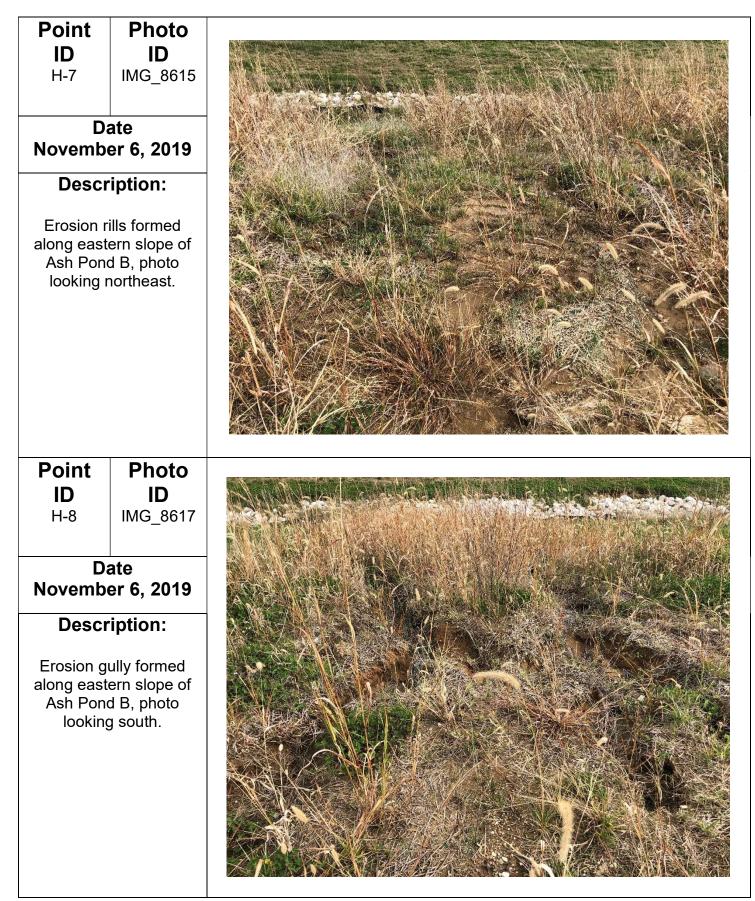


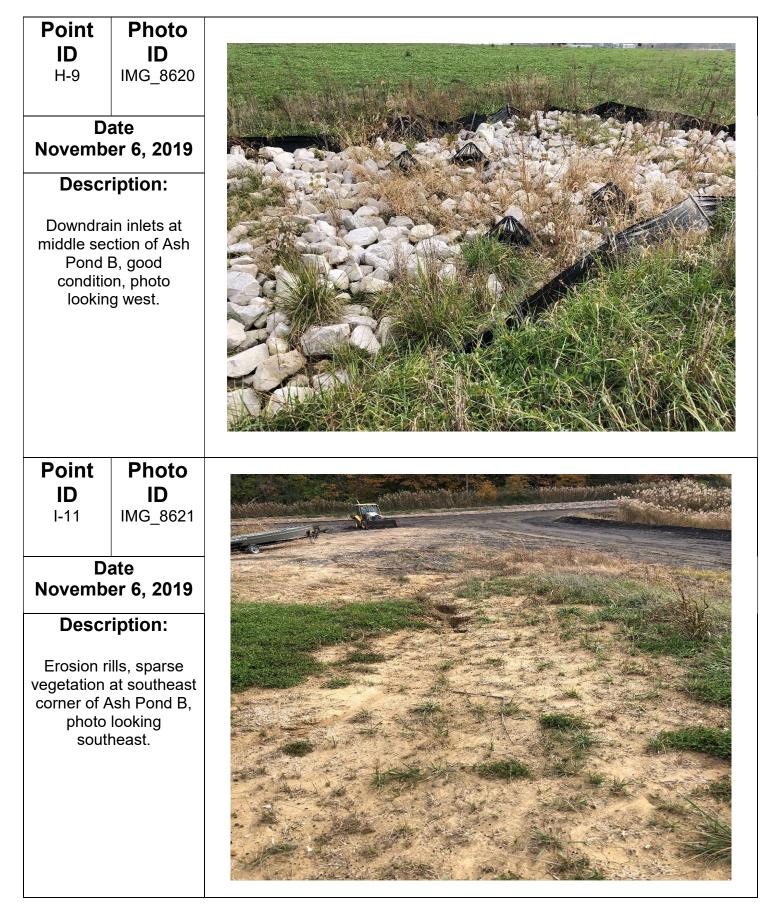


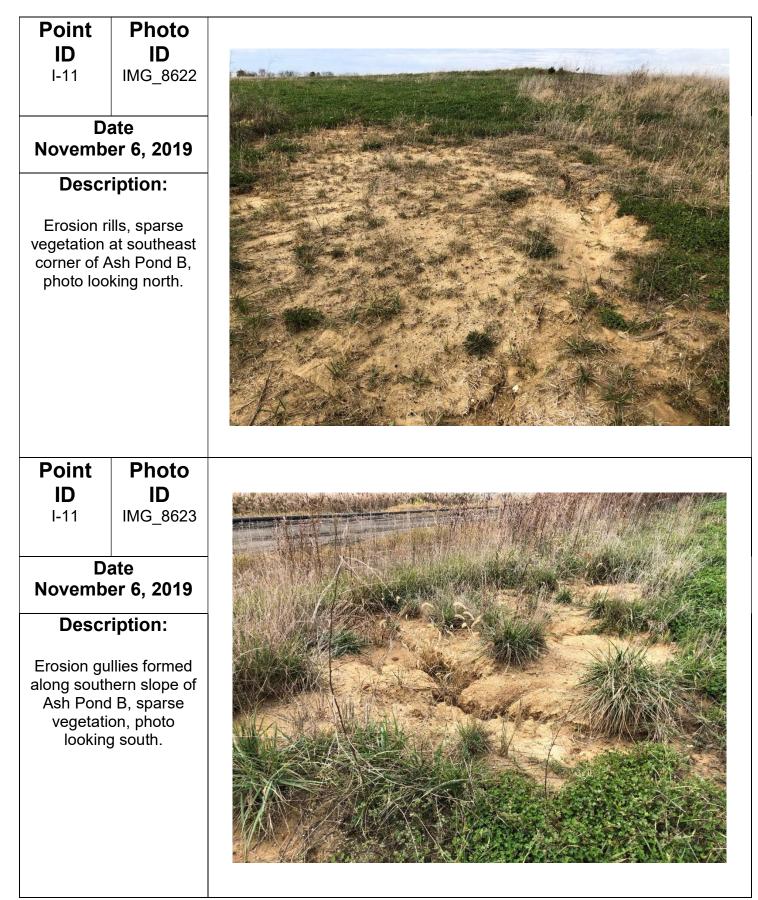


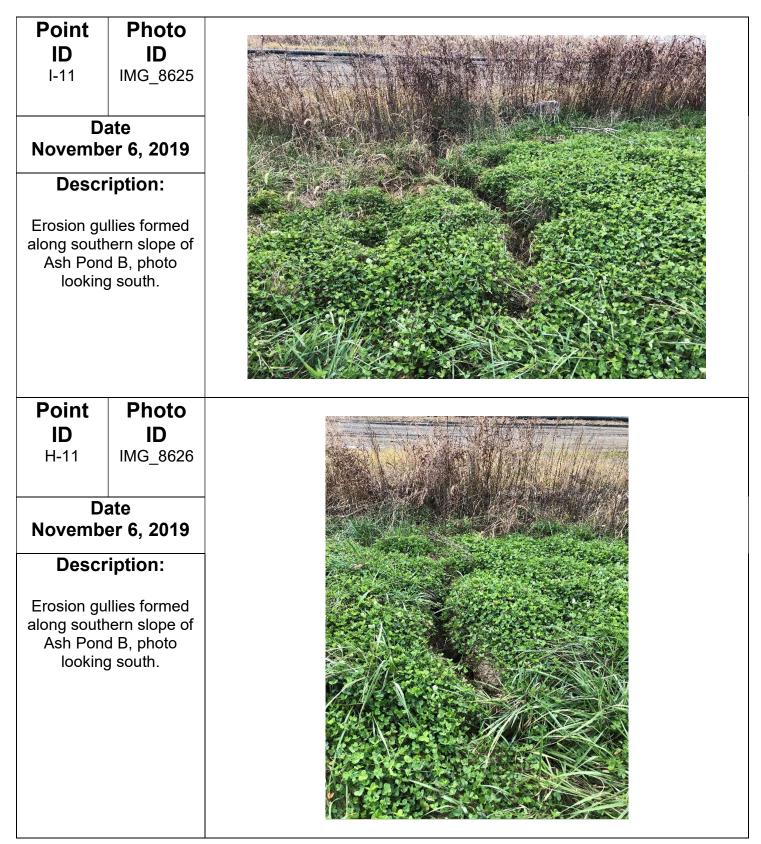




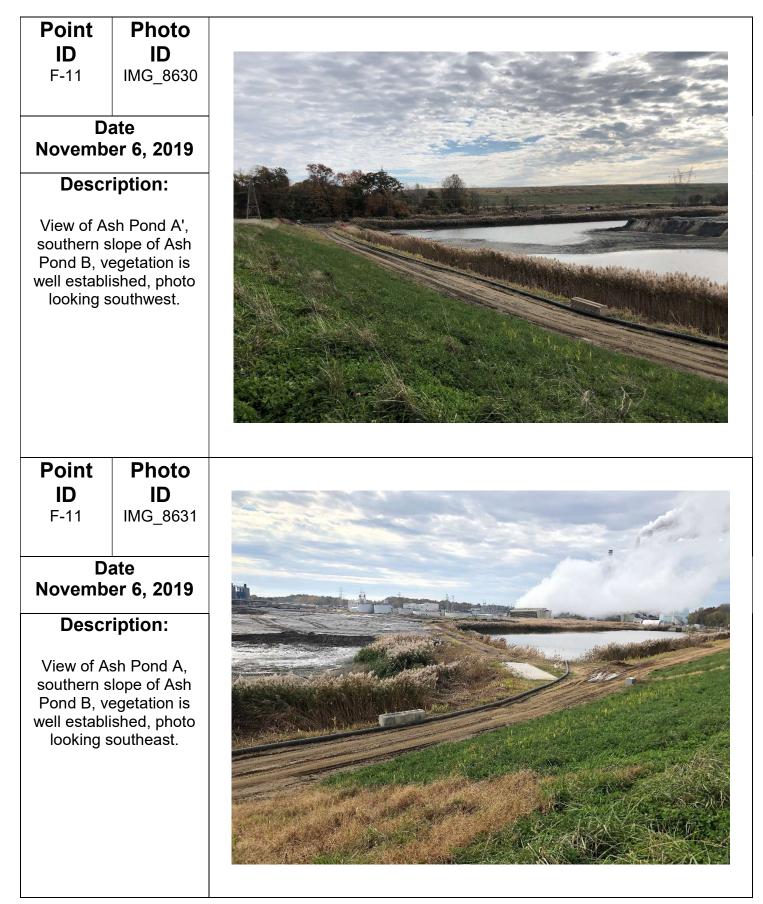


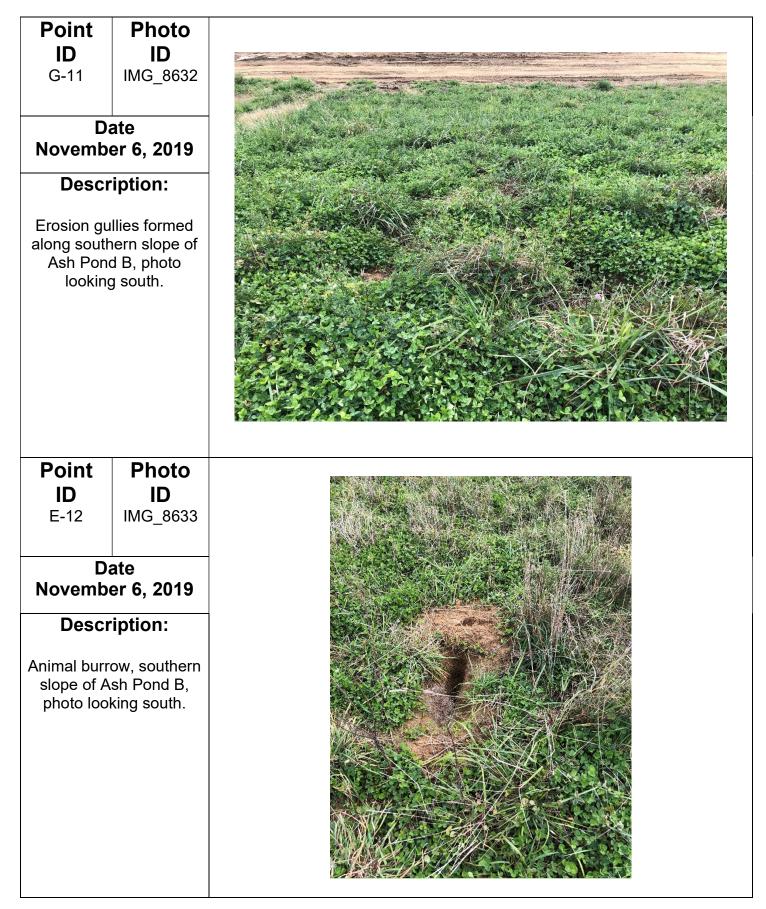






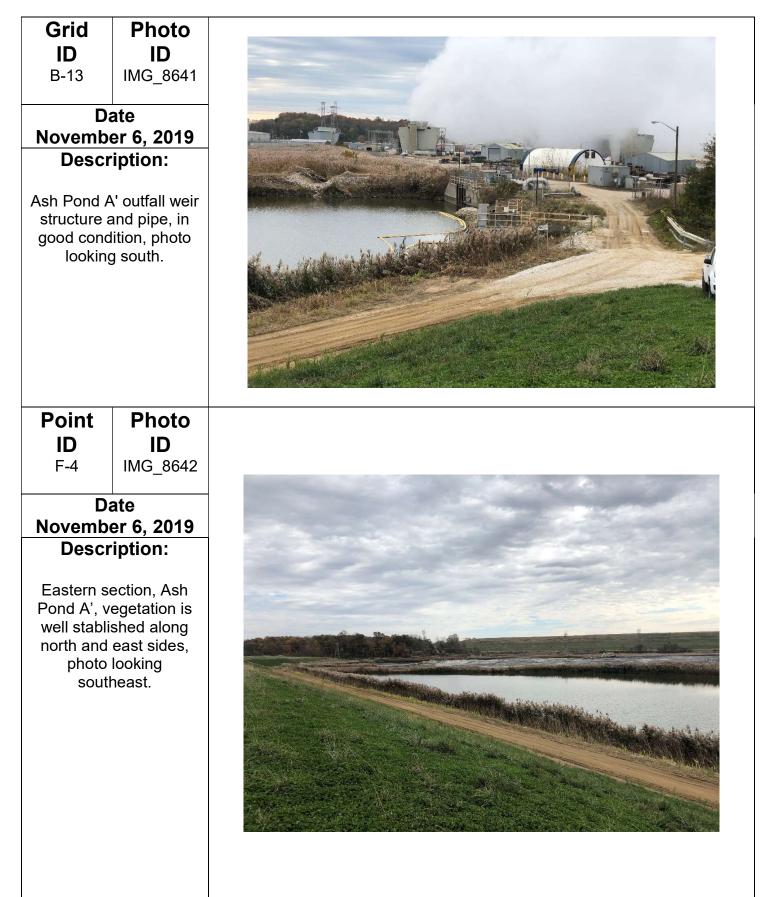
Point ID H-11	Photo ID IMG_8627
Date November 6, 2019	
Description: Erosion gullies forme along southern slope Ash Pond B, photo looking south.	
	Photo ID IMG_8628 ate er 6, 2019
Descr Erosion gu along south Ash Pone	ription: Illies formed hern slope of d B, photo g south.

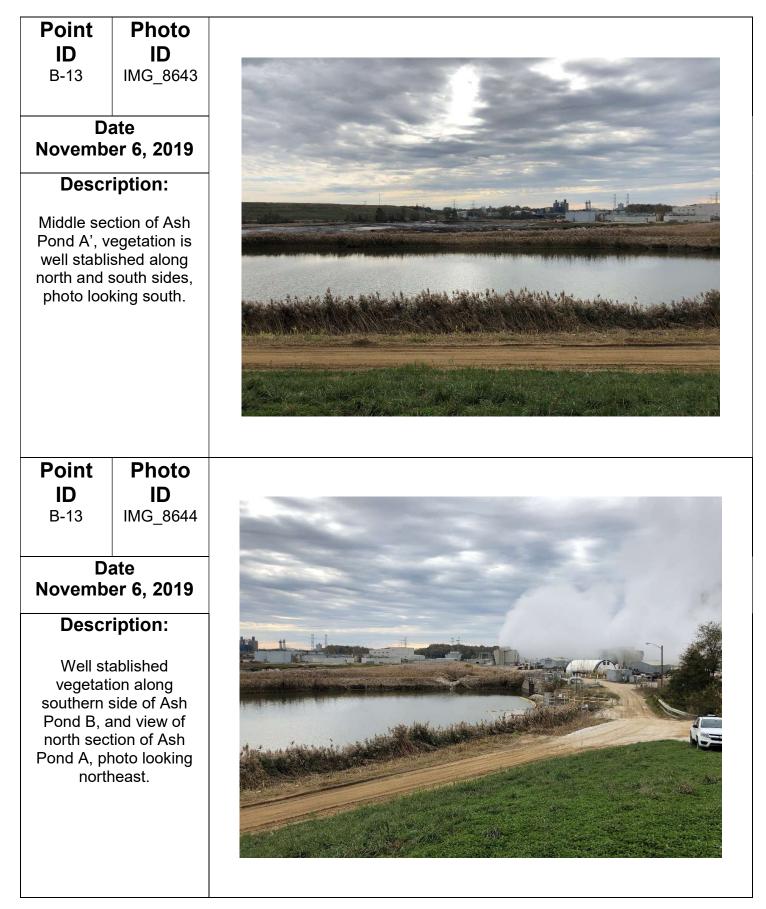


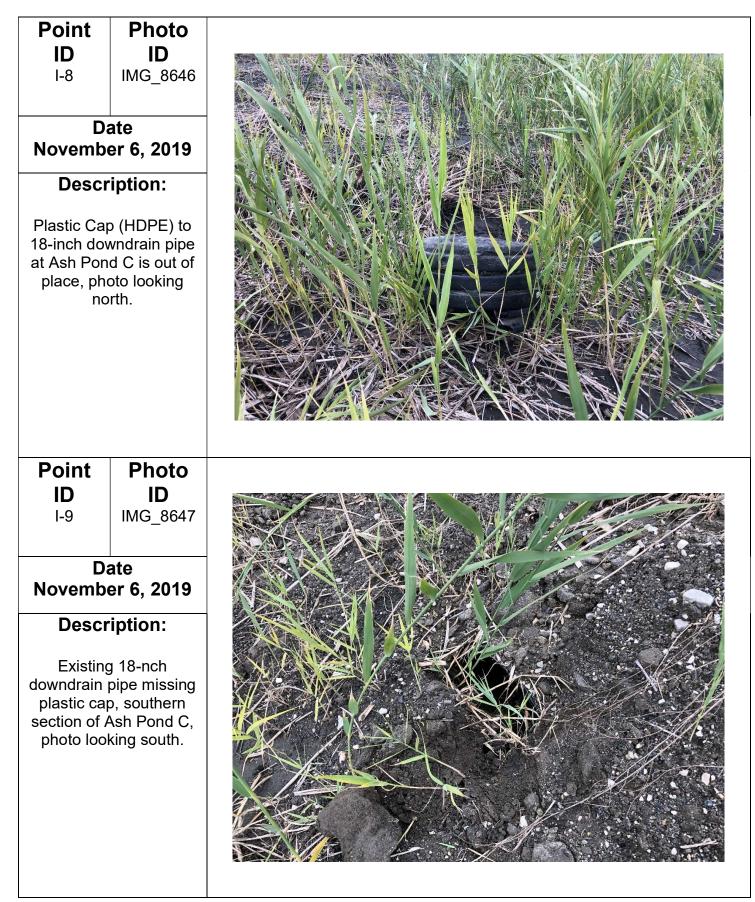


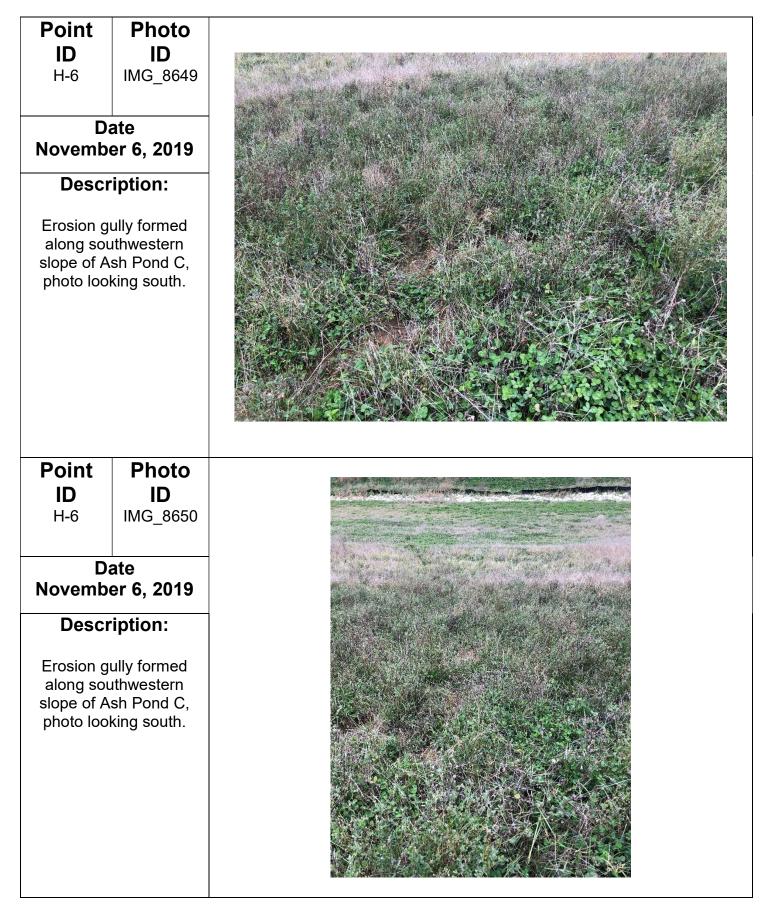
Point ID E-12	Photo ID IMG_8634	
	ate er 6, 2019	
Erosion gu along sou section of A	iption: Ilies formed thern slope Ash Pond B, king south.	
Point ID D-12	Photo ID IMG_8635	
	ate er 6, 2019	
Descr	iption:	
southern se Pond B, goo	in inlets at ection of Ash od condition, king west.	

Grid ID D-12	Photo ID IMG_8637
Date November 6, 2019 Description:	
Erosion gu along south Ash Pond	Illies formed hern slope of d B, photo g south.
Grid ID C-13	Photo ID IMG_8638
Da Novembo	ate er 6, 2019 ription:
Erosion gullies formed along southern slope of Ash Pond B, photo looking south.	









Point ID H-5	Photo ID IMG_8656	
	Date November 6, 2019	
Description:		
along sou slope of A	ully formed uthwestern sh Pond C, king south.	
Point ID	Photo ID	
Date		
Descr	Description:	