From:	Frank, Stephen
To:	"cwilhelm@pa.gov"; "Fair, Joel"
Cc:	"Tarquino Morris, Ali"; Schmidt, Keith A; Schenker, Jeremy S.; Panzino, Kevin P; Shott, David (David.Shott@aptim.com); Southorn, Richard (Richard.Southorn@aptim.com)
Subject:	Federal CCR Notification - Notice of Completion of Closure - 40 CFR 257.102(h)
Date:	Tuesday, July 02, 2019 3:43:00 PM
Attachments:	image001.png New Castle Ash Pond Closure Report--FINAL (6-25-19).pdf

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Christina and Joel,

Pursuant to EPA's CCR Rule at 40 CFR Part §257.102(h), §257.105(i)(8) and §257.106(i)(8), GenOn Power Midwest LP is providing notice that we have completed closure by removal of CCR of the North Bottom Ash Pond located at the New Castle Generating Station. This notice includes the attached certification by a qualified professional engineer as required by §257.102(f)(3).

Per the requirements of §257.107(i)(8), this notice will be available within 30 days (July 25) on our public website: https://www.genon.com/ccr-rule-compliance/.

Should you require additional information or if you would prefer to have these notices provided to other contacts at the Department, please do not hesitate to contact us.

Thank you, Steve

Stephen M. Frank, PE (Pa)
Senior Manager, Environmental
724-249-3610

CCR COMPLIANCE
CLOSURE CERTIFICATION REPORT
CLOSURE BY REMOVAL
NEW CASTLE NORTH BOTTOM ASH POND

Prepared for:

GenOn Power Midwest LP
New Castle Generating Station
West Pittsburg, Pennsylvania

Prepared by:

Aptim Environmental & Infrastructure, LLC
St. Charles, Illinois

June 2019

Table of Contents

List of Figures

List of Appendices

List of Acronyms & Abbreviations

ASD	Alternate Source Demonstration
CCR	coal combustion residuals
CFR	Code of Federal Regulations
GenOn	GenOn Power Midwest LP
Station	New Castle Generating Station

1.0 Introduction

GenOn Power Midwest LP, a subsidiary of GenOn Holdings, Inc. (GenOn), operates the New Castle Generating Station (Station) located in West Pittsburg, Pennsylvania. The Station operated as a coal-fired power plant prior to the transition to natural gas firing in mid-2016 and utilized the North Bottom Ash Pond for management of bottom ash coal combustion residuals (CCR). The North Bottom Ash Pond is designated as a regulated impoundment under the United States Environmental Protection Agency's CCR Rule, 40 Code of Federal Regulations (CFR) §257.

Between July 11, 2018 and September 25, 2018, all significant quantities of CCR were removed from the North Bottom Ash Pond. The purpose of the removal was initially part of the required annual cleaning under the Pennsylvania Residual Waste Regulations [25 PA Code §299.144(b)], but ultimately supported the pond's closure in accordance with §257.102(c) of the CCR Rule, which states:

> "Closure by removal of CCR. An owner and operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV of this part."

This report has been prepared to document the closure activities undertaken by Station personnel and provide certification from a professional engineer that closure has been successfully completed, per §257.102(f)(3).

2.0 North Bottom Ash Pond Overview

The North Bottom Ash Pond is reported to have been originally constructed in 1955. As shown on Figure 1, it is located immediately adjacent to an acknowledged unlined historic impoundment (approximately 120 acres in size) that was utilized for the management of coal ash. This impoundment accepted sluiced fly ash and bottom ash from approximately 1939 to 1978 and then "dry" fly ash from approximately 1978 to 1984. The impoundment continued to receive ash up until the time that the New Castle Plant Ash Landfill was constructed in the northern portion of the impoundment footprint.

The North Bottom Ash Pond encompasses an area of approximately 2.3 acres, as measured around the crest of the pond. Relative to construction, the pond was primarily incised in an area where fly ash and fill were previously placed, with a 1- to 3-foot dike present around the eastern perimeter. The pond is approximately 450 feet long by 200 feet wide, as measured from crest to crest at the widest sections, and has an average depth of 15 feet. Ground surface elevations around the top of the pond typically range between 778 to 781 feet above mean sea level, while the bottom elevation of the pond is approximately 760 feet above mean sea level.

As previously stated, the North Bottom Ash Pond was used for bottom ash management. Following the transition from coal to natural gas firing in mid-2016, the necessity for maintaining the pond as an active CCR unit was greatly diminished.

3.0 Description of Completed Closure Activities

Per the requirements of §257.102(b)(1)-(2), a Closure Plan was developed for the North Bottom Ash Pond in October 2016 and is posted on the publicly available website: https://www.genon.com/ccr-rule-compliance. This plan is also included herein as Appendix A. The closure by removal was done in accordance with §257.102(c) and this Closure Plan. All closure activities were completed within five years of commencing closure construction, per §257.102(f) (1) (ii), and included dewatering, excavation, inlet decommissioning, and outlet decontamination.

As noted in Section 1.0, pond cleaning activities began in July 2018. To support the cleaning and subsequent closure, the pond was dewatered in accordance with National Pollutant Discharge Elimination System Permit No. PA0005061, including management/discharge of standing water via permitted Outfall 004. All significant quantities of CCR were then removed from the pond base and sideslopes through excavation with equipment encompassing a front-end loader, long-stick track-hoe, and dozer. Generally accepted good engineering practices for dewatering and excavation slope stability were utilized throughout the entirety of the construction project. Photographs documenting the progression of the CCR removal activities are included in Appendix B of this report.

Excavation of CCR materials continued until a previously undocumented concrete liner was encountered at the base of the North Bottom Ash Pond. Concrete was found to be present across the entire base of the pond and the lower portion of the sideslopes (see Photograph Nos. 2 and 3 in Appendix B). Excavation on the sideslopes continued until CCR was no longer visible, which generally required over-excavation of the sideslopes in those areas not underlain by concrete. It is estimated that approximately 4,539 tons of CCR material were removed from the North Bottom Ash Pond. All excavated CCR material was placed in the New Castle Plant Ash Landfill,with cleaning/removal activities completed on September 25, 2018.

In support of forthcoming closure, all inlet piping and associated structures were decommissioned and removed from the North Bottom Ash Pond. Two discharge weirs, identified as the primary and secondary outlet structures, and associated stoplogs were decontaminated and left in place (see Photograph Nos. 4 and 5 in Appendix B).

4.0 Site Inspection by a Professional Engineer

Richard Southorn, a qualified professional engineer licensed in the Commonwealth of Pennsylvania, visited the facility on October 23, 2018 to inspect the North Bottom Ash Pond. Activities undertaken by GenOn to support the closure were discussed, and photographic documentation of the work performed was reviewed. A comprehensive walk was conducted along the pond's sideslopes, base, and perimeter. No CCR material was observed during the inspection, supporting the conclusion that all significant quantities of CCR material have been removed and appropriately disposed within the on-site landfill. Inlets were determined to be decommissioned. All appropriate elements outlined in the Closure Plan were acknowledged as complete, with only groundwater aspects (discussed in Section 5.0) yet to be affirmed to formalize the pond's closure.

5.0 Compliance with Groundwater Protection Standards

Per §257.102(c), closure of a CCR impoundment is not deemed complete until groundwater monitoring concentrations associated with the unit do not exceed the groundwater protection standards established pursuant to §257.95(h) for Appendix IV constituents.

The North Bottom Ash Pond has a dedicated groundwater monitoring system that was installed in November 2015 to meet CCR Rule requirements. The groundwater monitoring system consists of one upgradient well (MP-20) and three downgradient wells (MP-21, MP-22, and MP-23). Detection monitoring for the North Bottom Ash Pond began in December 2015 after implementation of the Rule.

The North Bottom Ash Pond was transitioned into the CCR Assessment Monitoring Program in April 2018 due to elevated chloride levels that were observed in downgradient Well MP-23. Upon entry into the Assessment Monitoring Program, an initial round of samples covering all Appendix III and Appendix IV constituents was collected in May 2018 per §257.95(b). Appendix IV constituents detected in May 2018 were analyzed again during the August 2018 Assessment Monitoring Event. Following receipt and evaluation of the data, a preliminary determination was made that arsenic was present in all downgradient wells at concentrations that represented a statistically significant level above the corresponding groundwater protection standard.

An evaluation was completed in April 2019 to determine whether the North Bottom Ash Pond or an alternate source was responsible for the elevated arsenic concentrations. This evaluation, in the form of an Alternate Source Demonstration (ASD), is posted on the publicly available website: https://www.genon.com/ccr-rule-compliance. The ASD concluded that the arsenic concentrations in the downgradient wells are derived from an alternate source—namely, the 120-acre historic unlined impoundment that is immediately adjacent (i.e., north and west) to the North Bottom Ash Pond. Commensurate with this conclusion, the statistically significant levels from the August 2018 Assessment Monitoring event are deemed not to be in association with the New Castle North Bottom Ash Pond.

Based on the findings of the ASD, no groundwater monitoring concentrations exceeding the groundwater protection standard established pursuant to §257.95(h) for Appendix IV constituents are associated with the North Bottom Ash Pond. The most recent round of Assessment Monitoring data (samples collected May 2019) provides additional confirmation of only arsenic being elevated in the downgradient wells, and again with reliance on the April 2019 ASD findings to attribute these concentrations to the former historic ash impoundment.

In parallel with the above ASD and once a successful outcome was recognized, GenOn prepared a "Notification of Intent to Close" for the North Bottom Ash Pond on March 29, 2019 to comply with the requirements of §257.102(g). This correspondence was subsequently placed into the Station's operating record per §257.105(i)(7), noticed to the State Director per §257.106(i)(7) and posted to the publicly accessible website per §257.107(i)(7).

6.0 Future Use of the North Bottom Ash Pond

As of the certification date of this report (see Section 7.0), the North Bottom Ash Pond will be deemed a closed CCR unit under 40 CFR §257. Accordingly, CCR Rule requirements for active units will no longer apply to this impoundment.

Following closure, it is GenOn's intent to maintain the pond for potential management and temporary storage of non-CCR liquids, as may be needed. The outlet structures (along with the stoplogs) will remain in place; however, any non-CCR liquids introduced to the pond will be held there on a temporary basis and will not be discharged to Outfall 004 unless authorized under the Station's NPDES permit.

7.0 Qualified Professional Engineer Certification

I, the undersigned professional engineer licensed in the Commonwealth of Pennsylvania, certify in accordance with §257.103(f)(3), that the North Bottom Ash Pond at the New Castle Generating Station was closed in accordance with the requirements of §257.102(c) of the CCR Rule and the Closure Plan. The basis of this professional opinion is described within this report and is limited to the available information known to APTIM. This professional opinion is not to be interpreted or construed as a guarantee, warranty, or legal opinion.

Name of Professional Engineer:	Richard Southorn, P.E., P.G.
Company:	Aptim Environmental & Infrastructure, LLC
PE Registration Number:	PE 085411

Professional Engineer Seal:

8.0 References

"Closure Plan: New Castle Station North Bottom Ash Pond West Pittsburg, Lawrence County, Pennsylvania," Civil & Environmental Consultants, Inc. Pittsburgh, Pennsylvania, October 2016.

"CCR Compliance Alternate Source Demonstration, Appendix IV Groundwater Exceedance, New Castle North Bottom Ash Pond," Aptim Environmental & Infrastructure, LLC, April 2019.

United States Environmental Protection Agency (2015), Hazardous Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, Federal Register Volume 80, No. 74, 40 CFR Parts 257 and 261, April 17, 2015.

Figure

N

0 400'

GRAPHIC SCALE

LEGEND

- APPROXIMATE NORTH BOTTOM ASH POND BOUNDARY
- NEW CASTLE PLANT ASH LANDFILL
- APPROXIMATE HISTORIC 120-ACRE ASH IMPOUNDMENT BOUNDARY

NOTES

1. FOR CLARITY, NOT ALL SITE FEATURES MAY BE SHOWN.

REV. NO.	DATE	DESCRIPTION

GenOn™

APTIM Environmental & Infrastructure, LLC

NEW CASTLE NORTH BOTTOM ASH POND
WEST PITTSBURG, PENNSYLVANIA

FIGURE 1
SITE LOCATION MAP

DRAWN BY:	BWM	APPROVED BY:	DAM	PROJ. NO.:	1009194003	DATE:	JUNE 2019

T:\AutoCAD\Projects\NRG\NewCastleLF\Figures\N-BottomAshPonds\Closure Report\Fig-01-SiteLocation.dwg, 11x17, 5/29/2019 12:33:13 PM

Appendix A

North Bottom Ash Pond Closure Plan (October 2016)

CLOSURE PLAN

NEW CASTLE STATION NORTH ASH POND
WEST PITTSBURG, LAWRENCE COUNTY, PENNSYLVANIA

Prepared for:

NRG POWER MIDWEST LP
NEW CASTLE GENERATING STATION
2189 STATE ROUTE 168 SOUTH
WEST PITTSBURG, PENNSYLVANIA 16160

Prepared by:

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
333 BALDWIN ROAD
PITTSBURGH, PA 15205

CEC Project 154-531.0004

October 2016

TABLE OF CONTENTS

APPENDICES

CLOSURE PLAN
NEW CASTLE STATION NORTH ASH POND

1.0 PURPOSE

On behalf of NRG Power Midwest LP (NRG), Civil & Environmental Consultants, Inc. (CEC) has prepared this Closure Plan for the North Ash Pond in accordance with the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule 40 CFR 257.102 (§257.102) dated April 17, 2015. This Closure Plan has been prepared to describe the steps necessary to close the ash pond at any point during the active life consistent with recognized and generally accepted good engineering practices.

For existing CCR impoundments, the plans must be prepared no later than October 17, 2016 and placed in the facility's operating record. The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the design meets the requirements of this section. The professional engineer certification is provided in Appendix A.

2.0 BACKGROUND

The New Castle Generating Station (Station) is located in West Pittsburg, Lawrence County, Pennsylvania. Refer to Figure 1 in Appendix B for the Site Location Map. The Station ceased operations using coal to generate power on March 23, 2016. The Station previously used the North Ash Pond and South Ash Pond for bottom ash management. The South Ash Pond was decommissioned and cleaned of CCR prior to the effective date of the CCR Rule, and is not considered in this Closure Plan. Refer to Figure 2 in Appendix B for the Existing Conditions Plan.

The North Ash Pond was used for bottom ash management for the Station. Bottom ash was sluiced from the Station to the North Ash Pond. Water routed through the Pond was discharged through an outlet structure back into the Beaver River. This discharge is permitted under National Pollutant Discharge Elimination System (NPDES) Permit No. PA0005061. CCR

settled from the sluiced water into the North Ash Pond. The North Ash Pond is considered a CCR impoundment by the CCR Rule. The North Ash Pond is currently used for non-CCR waste. The North Ash Pond will be decommissioned and cleaned of CCR in accordance with §257.102 and this Closure Plan.

3.0 COMPLIANCE WITH §257.102 – CRITERIA FOR CONDUCTING THE CLOSURE OF CCR UNITS.

The following sections address the information required by §257.102.

3.1 NARRATIVE OF CLOSURE - §257.102(b)(1)(i)

The North Ash Pond will be closed by removing CCR in accordance with §257.102(c). CCR removal will be completed as described in the following section.

3.2 CCR REMOVAL AND DECONTAMINATION – §257.102(b)(1)(ii)

Closure of the North Ash Pond will generally include the following activities:

- Obtain all necessary Federal, State and Local permits;
- Prepare construction bid specifications and contract work;
- Dewater Pond in accordance with NPDES Permit No. PA0005061;
- Remove CCR based on visual assessment. Excavated CCR will be dewatered using current operations techniques and hauled to the New Castle Plant Ash Landfill (Landfill) for disposal;
- Remove visibly impacted soils beneath the bottom ash;
- Install erosion and sedimentation controls as needed;
- Remove or decontaminate and leave in-place the Pond inlet and outlet structures. Inlet and outlet structures include pipe, concrete boxes, steel grates, manholes, etc.
- Dispose of removed structures in accordance with applicable regulations;

- Seed and mulch disturbed areas.

NRG may elect to retrofit the closed Pond for an alternate use.

Refer to Figure 3 in Appendix B for the Final Conditions Plan, which shows the general closure procedures for the Pond.

3.3 FINAL COVER REQUIREMENTS – §257.102(b)(1)(iii)

CCRs will be removed from the Pond in accordance with §257.102(c); therefore, a final cover system is not required.

3.4 MAXIMUM CCR INVENTORY - §257.102(b)(1)(iv)

The North Ash Pond capacity is approximately 16 acre-feet (approximately 26,000 cubic yards). The North Ash Pond is dredged on an annual basis to remove accumulated CCR and restore impoundment capacity. The maximum volume of CCR currently in the North Ash Pond is approximately 5,000 cubic yards.

3.5 MAXIMUM AREA REQUIRING FINAL COVER – §257.102(b)(1)(v)

CCRs will be removed from the Pond in accordance with §257.102(c); therefore, a final cover system is not required.

3.6 CLOSURE SCHEDULE – §257.102(b)(1)(vi)

The Station ceased operations using coal to generate power on March 23, 2016 and ceased using the North Ash Pond for bottom ash management at that time. The North Ash Pond is currently used for non-CCR waste. In accordance with §257.102(e)(1)(i), closure activities will commence no later than 30 days after the date on which the CCR unit receives the final receipt of waste, either CCR or any non-CCR waste stream unless an extension is requested. Closure

activities may include dewatering, decommissioning inlet and outlet structures, removal of inlet and outlet structures. All necessary permits will be obtained prior to construction activity. Additionally, in accordance with §257.102(f)(1)(ii) closure activities will be completed within five years of commencing closure activities. Once the North Ash Pond is closed, a professional engineer will verify and certify that closure has been completed in accordance with §257.102(c) in accordance with §257.102(f)(3). Within 30 days of completing closure of the North Ash Pond, a notification of closure will be prepared by NRG and will include the professional engineer's certification of completion §257.102(h).

4.0 CONCLUSION

The Closure Plan demonstrates compliance with §257.102 of the CCR Rule. The certification statement by a qualified professional engineer is provided in Appendix A. Supporting documents are provided in Appendix B. The North Ash Pond is not required to meet the Post-Closure Care requirements as stated in §257.104(a)(2).

This demonstration will be placed in the operating record by October 17, 2016. Based on site conditions, the Closure Plan may be amended at any time.

APPENDIX A

PROFESSIONAL ENGINEER CERTIFICATION STATEMENT

PROFESSIONAL ENGINEER CERTIFICATION

This Closure Plan fulfills the CCR Rule requirements (40 CFR Parts 257 and 261) dated April 17, 2015. This Closure Plan will be placed in the operating record by October 17, 2016.

I, Angela M. Ramirez, P.E., a registered professional engineer in the State of Pennsylvania, certify that the Closure Plan for the New Castle Station North Ash Pond fulfills the requirements of §257.102. This certification is based on my review of the Closure Plan for New Castle Station North Ash Pond.

Angela M. Ramirez, P.E.
Printed Name of Professional Engineer

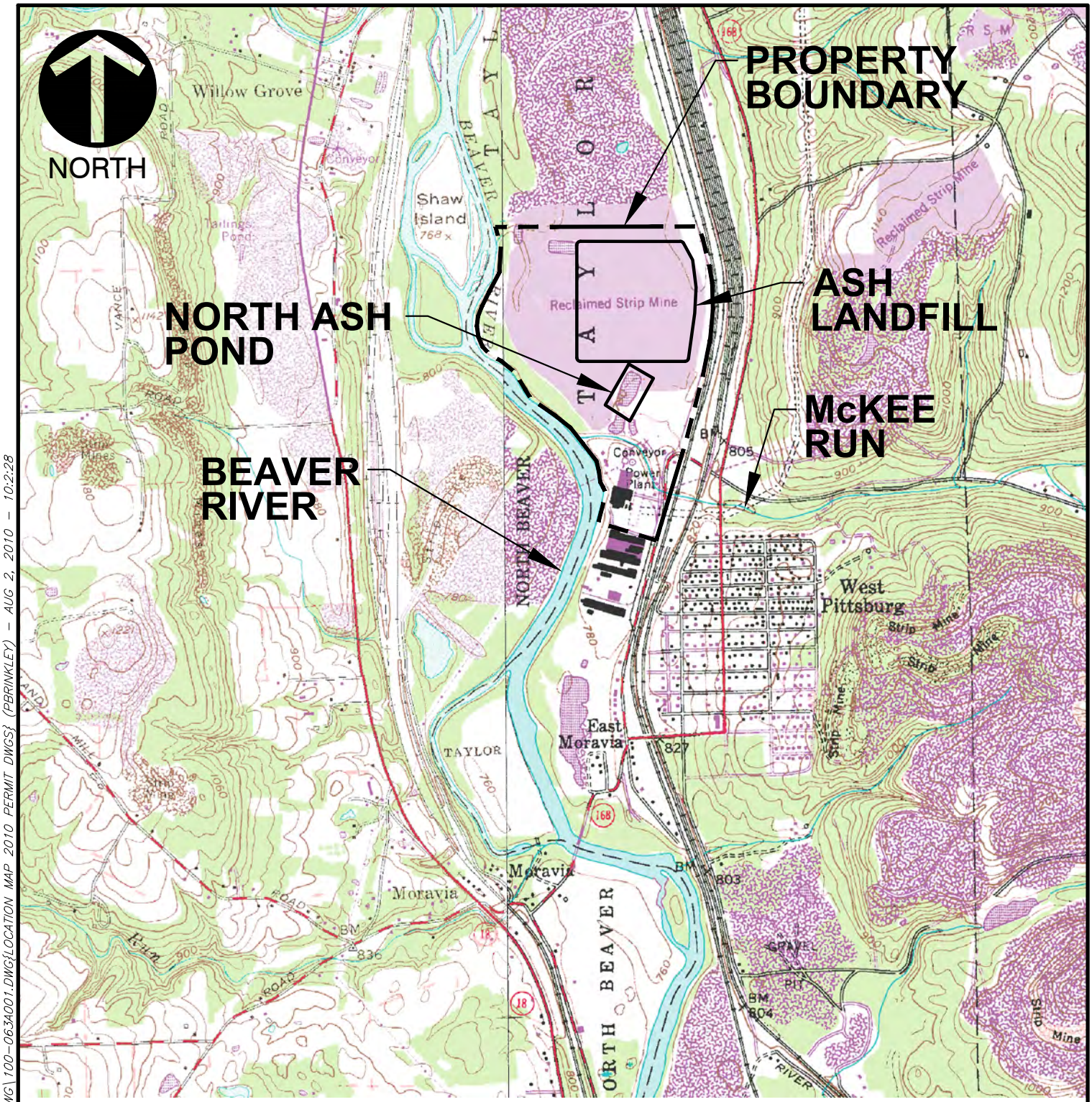
Angela M Ramirez
Signature

PE082317	Pennsylvania	10-14-2016
Registration No.	Registration State	Date

Stamp/Seal:

APPENDIX B

FIGURES



REFERENCE

U.S.G.S 7.5 MIN. TOPOGRAPHIC QUADRANGLE NEW CASTLE SOUTH, PA (PHOTOREVISED 1990) BESSEMER, PA (PHOTOREVISED 1990)

SCALE IN FEET

0 2000 4000

* HAND SIGNATURE ON FILE

Civil & Environmental Consultants, Inc.
333 Baldwin Road - Pittsburgh, PA 15205
412-429-2324 · 800-365-2324
www.cecinc.com

NRG POWER MIDWEST LP
NEW CASTLE STATION NORTH ASH POND
WEST PITTSBURG
LAWRENCE COUNTY, PENNSYLVANIA

SITE LOCATION MAP

DRAWN BY:	DWD	CHECKED BY:	AMR	APPROVED BY:	RJB*	FIGURE NO.:	1
DATE:	9/23/2016	DWG SCALE:	1"=2000'	PROJECT NO:	154-531.0004		

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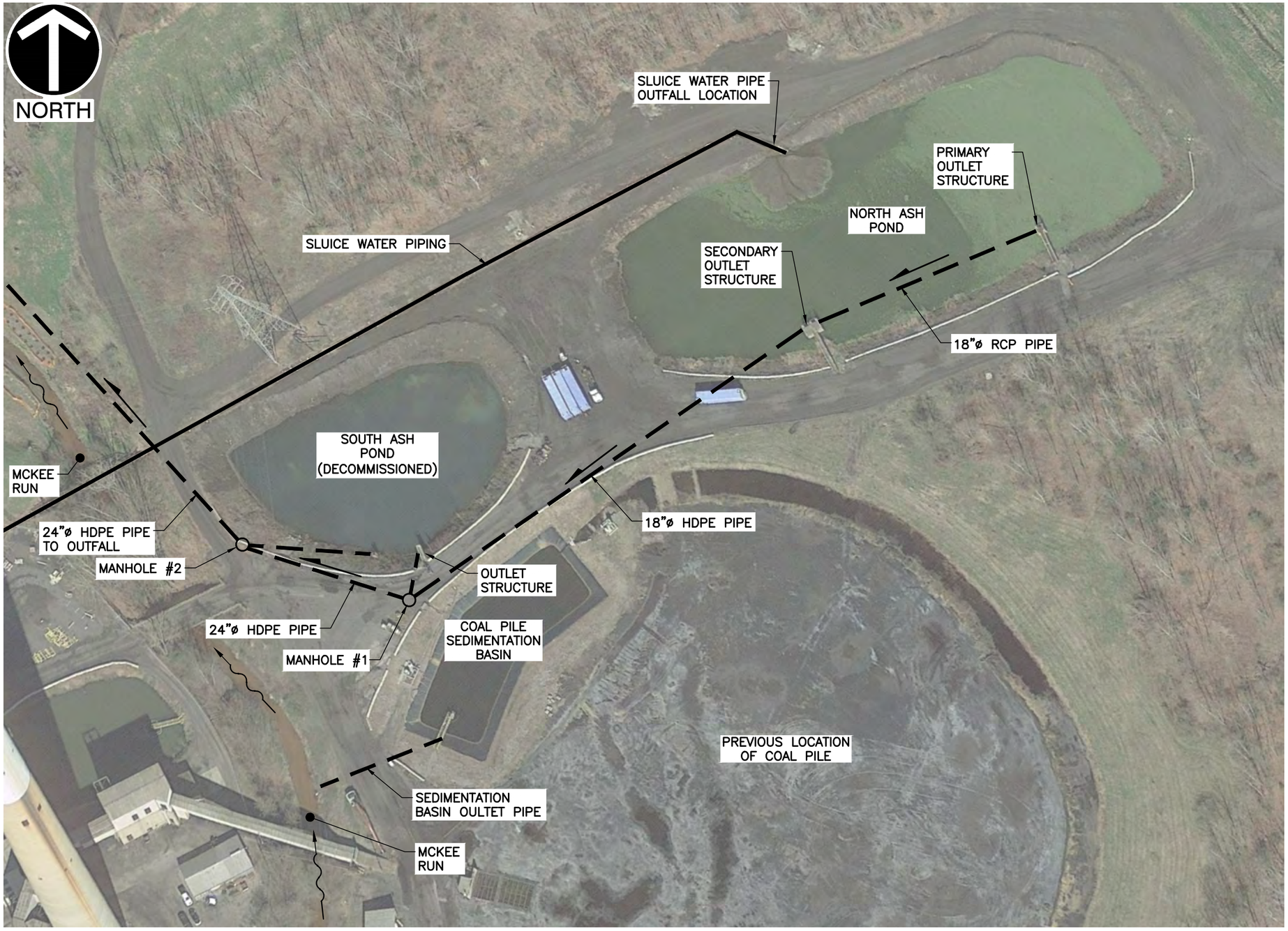

GENERAL NOTES

1. THE SOUTH ASH POND WAS DECOMMISSIONED AND CLEANED OF CCR PRIOR TO THE EFFECTIVE DATE OF THE CCR RULE.

*HAND SIGNATURE ON FILE

REFERENCE

1. FEATURE ITEMS DERIVED FROM O'BRIEN & GERE ENIGINEERS, INC. FIGURE 2 "SITE AERIAL PHOTOGRAPH AND PHOTOGRAPH LOCATION MAP" DATED, JANUARY 2014.
2. AERIAL PHOTOGRAPHY COPYRIGHT GOOGLE EARTH PRO VERSION 6.2, IMAGERY DATE 04-15-2016.

SCALE IN FEET

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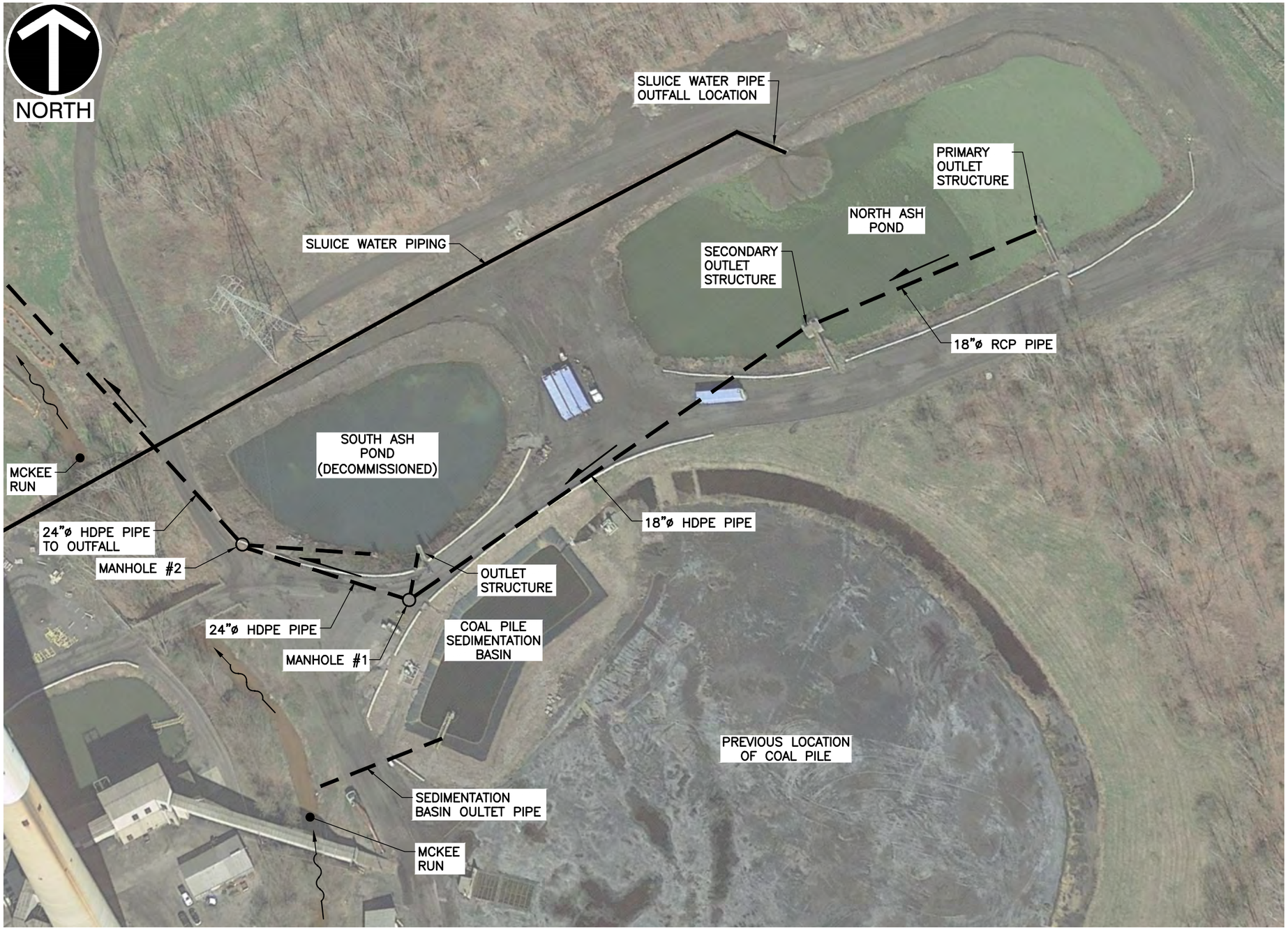
NRG POWER MIDWEST LP
NEW CASTLE STATION NORTH ASH POND
WEST PITTSBURG
LAWRENCE COUNTY, PENNSYLVANIA

NORTH ASH POND
EXISTING CONDITIONS PLAN

DRAWN BY:	RJB	CHECKED BY:	AMR	APPROVED BY:	RJB*	FIGURE NO.: 2
DATE:	9/23/2016	DWG SCALE:	1"=100'	PROJECT NO:	154-531.0004	



CLOSURE NOTES

1. NRG WILL OBTAIN ALL NECESSARY PERMITS.
2. CONSTRUCTION BID SPECIFICATIONS WILL BE PREPARED AND WORK WILL BE CONTRACTED.
3. THE POND WILL BE DEWATERED IN ACCORDANCE WITH THE NPDES PERMIT.
4. CCR WILL BE REMOVED BASED ON VISUAL ASSESSMENT. EXCAVATED CCR WILL BE DEWATERED, AND HAULED TO THE LANDFILL FOR DISPOSAL.
5. ALL VISIBLY IMPACTED SOILS BENEATH THE BOTTOM ASH WILL BE REMOVED.
6. EROSION AND SEDIMENTATION CONTROLS WILL BE INSTALLED AS NEEDED.
7. ALL INLET AND OUTLET STRUCTURES FOR THE POND WILL BE REMOVED OR DECONTAMINATED AND LEFT IN–PLACE.
8. STRUCTURES WILL BE DISPOSED OF IN ACCORDANCE WITH APPLICABLE REGULATIONS.
9. ALL DISTURBED AREAS WILL BE SEEDED AND MULCHED.

GENERAL NOTES

1. THE SOUTH ASH POND WAS DECOMMISSIONED AND CLEANED OF CCR PRIOR TO THE EFFECTIVE DATE OF THE CCR RULE.

*HAND SIGNATURE ON FILE

REFERENCE

1. FEATURE ITEMS DERIVED FROM O'BRIEN & GERE ENIGINEERS, INC. FIGURE 2 "SITE AERIAL PHOTOGRAPH AND PHOTOGRAPH LOCATION MAP" DATED, JANUARY 2014.
2. AERIAL PHOTOGRAPHY COPYRIGHT GOOGLE EARTH PRO VERSION 6.2, IMAGERY DATE 04–15–2016.

SCALE IN FEET
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NRG POWER MIDWEST LP
NEW CASTLE STATION NORTH ASH POND
WEST PITTSBURG
LAWRENCE COUNTY, PENNSYLVANIA

NORTH ASH POND
FINAL CONDITIONS PLAN

DRAWN BY:	RJB	CHECKED BY:	AMR	APPROVED BY:	RJB*	FIGURE NO.:
DATE:	9/23/2016	DWG SCALE:	1"=100'	PROJECT NO:	154-531.0004	3

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Appendix B

North Bottom Ash Pond Closure Activities Photo Log

Photo No. 1: Date: 8/30/2018 Direction: North Description: A long-stick track-hoe removes Coal Combustion Residuals (CCR) from the North Bottom Ash Pond (Pond). The CCR is loaded into an off-road haul truck and taken to the New Castle Plant Ash Landfill for disposal (landfill can be seen in background).	

Photo No. 2: Date: 10/23/2018 Direction: Toward Ground, Facing East Description: A concrete liner was encountered across the entire base and along the lower portion of the sideslopes of the Pond.	

Photo No. 3: Date: 10/23/2018 Direction: Northwest Description: View of Pond after CCR removal. The concrete base can be seen in the foreground. The concrete extends across the entire base of the Pond, but had standing water over portions of it when photographed. The sideslopes were visually inspected, with no CCR observed at any location.	

Photo No. 4: Date: 10/23/2018 Direction: East Description: The concrete extended to the top of the Pond in two locations, suggesting that these locations may have been access ramps into the pond. Darker material is soil that was visually inspected and found to be absent of CCR.	

Photo No. 5: Date: 10/23/2018 Direction: Northeast Description: View of soil sideslopes that were visually inspected and found to be absent of CCR. The concrete base can be seen under the standing water. The primary (north) outlet structure is shown, and which will remain after pond closure.	

Photo No. 6: Date: 10/23/2018 Direction: South Description: View of soil sideslopes that were visually inspected and found to be absent of CCR. The secondary (south) outlet structure is shown, and which will remain after pond closure.