AECOM

Morrow CCR Impoundment
CCR Management Unit Facility Evaluation Report – Part 1

STS Hydropower, LLC

Project Number: 60738676

February 9, 2026

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Quality information

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	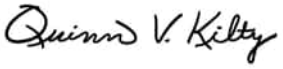		
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Revision History

Revision	Revision date	Details	Authorized	Name	Position

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Introduction

On May 8, 2024, the U.S. Environmental Protection Agency published its Legacy Coal Combustion Residuals Rule (Legacy CCR Rule, 40 CFR 257) regulating historical CCR management units (CCRMU) at electric utility or independent power producer facilities for the first time. CCRMUs are defined in the rule as "…any area of land on which any noncontainerized accumulation of CCR is received, is placed, or is otherwise managed, that is not a regulated CCR unit. This includes inactive CCR landfills and CCR units that closed prior to October 19, 2015 [date of the original CCR Rule]" The Legacy CCR Rule does include certain beneficial uses of CCRs in the definition of a CCRMU unless those uses are found to contribute to environmental issues at the facility.

The rule requires that an owner or operator of an active facility or a facility with a legacy CCR surface impoundment (defined separately in the rule) must conduct a facility evaluation to identify all CCRMUs at the facility in accordance with Section §257.75 of the rule. The rule states that, at a minimum, the presence or absence of CCRMUs at the facility must be confirmed and documented through a thorough evaluation of reasonably and readily available records that contain the information needed to prepare the Facility Evaluation Reports Part 1 and Part 2 required by paragraphs (c) and (d) of §257.75, respectively. This report contains the fourteen elements listed for the Facility Evaluation Report, Part 1 (§257.75(c)(1)(i - xiv)) applicable to the site where the legacy Morrow CCR Impoundment is located, which is currently owned by STS Hydropower, LLC. As described further in Section 12, AECOM conducted a site visit on November 10, 2025 to aid in identification of CCRMUs and completion of the Report.

1. Identification Information

In accordance with Section §257.75(c)(1)(i), the name and address of the person(s) owning the facility are as follows:

STS Hydropower, LLC.
2 Bethesda Metro Center, Suite 1330
Bethesda, MD 20814

The unit name associated with each regulated CCR unit and CCR management unit at the facility, including the identification number of each unit if any have been assigned by the state or by the owner are as follows:

Unit Type*	Unit Name	ID Number / NA	ID Assignment / NA
Regulated CCR Unit	Morrow CCR Impoundment	N/A	N/A
CCRMU	Ash Piles Area	1	AECOM

CCRMU	Railroad Loop Area	2	AECOM

**Note: Regulated CCR Units include active, inactive and legacy CCR surface impoundments and CCRMU are newly identified.*

2. Location of CCRMU

In accordance with Section §257.75(c)(1)(ii), the location of each regulated CCR unit and each CCR management unit noted above is identified on the most recent U.S. Geological Survey (USGS) 7.5-minute or 15-minute topographic quadrangle map (or a topographic map of equivalent scale if a USGS map is not available) are provided in **Appendix A** of this Part 1 report. Due to the small scale of these maps, an aerial image inset has been included to provide more geospatial information.

3. Purpose of CCRMU

In accordance with Section §257.75(c)(1)(iii), a statement of the purpose(s) for which each CCR management unit at the facility is or was used is as follows:

CCRMU Name	Purpose of Unit
Ash Piles Area	The Ash Piles Area is made up of eleven discrete piles. Limited historical disposal of coal ash (fly ash, bottom ash, and/or economizer ash). The source of the coal ash was the adjacent, former Morrow Power Plant that operated from 1939 to 1982. However, review of historical aerial photographs (see **Appendix B**) could not determine the specific method or timeframe for the disposal in the unit. STS Hydropower was not able to provide records concerning this CCRMU from the former Morrow Power Plant owner/operator, Consumers Power (now Consumers Energy), during operation. STS Hydropower stated that they acquired the land circa 1983 (excluding the area where the Morrow Power Plant was located) and requested specific records concerning the Ash Piles Area in 2025, with no records provided related to the Ash Piles Area. [B-1, **Appendix B**]
Railroad Loop Area	Unknown purpose, but in a similar location as the Ash Piles Area. Review of historical aerial photographs (see **Appendix B**) could not determine the specific method or timeframe for the disposal in the unit. STS Hydropower has not received any records concerning this Railroad Loop Area from the former Morrow Power Plant owner/operator, Consumers Power (now Consumers Energy), or any information on the purpose of the CCRMU. STS Hydropower stated that they acquired the land circa 1983 (excluding area where the the Morrow Power Plant was located) and requested specific records concerning the Railroad Loop Area in 2025, with no responsive records provided. [B-1, **Appendix B**]

4. Physical/Engineering Properties

In accordance with Section §257.75(c)(1)(iv), a description of the physical and engineering properties of the foundation and abutment materials on which each CCR management unit is constructed is as follows:

CCRMU Name	Foundation Description	Abutment Description
Ash Piles Area	The base of the unit appears to be on native surface soils adjoining the outside slope of the Morrow CCR Impoundment western berm per visual observations during site visits in October of 2024 and November of 2025.	The Ash Piles Area is located against the outside slope of the western berm for the Morrow CCR Impoundment (east abutment of this unit)There are no abutments on the north, south, or west sides of the Ash Piles Area.
Railroad Loop Area	The base of the unit appears to be on native surface soils between the outside slope of the Morrow CCR Impoundment western berm and the former Morrow Power Plant railroad loop per visual observations during site visits in November of 2024 and November of 2025.	There are no abutments to this unit but rather defined by the western berm of the CCR Impoundment on the east side and the approximate alignment of the former Morrow Power Plant railroad loop on the west side.

5. Record/Knowledge of Spills/Releases

In accordance with Section §257.75(c)(1)(v), a discussion of any known spills or releases of CCR, including any associated remediation activities, from each CCR management unit and whether the spills or releases were reported to state or federal agencies is as follows:

CCRMU Name	Discussion of Known Spills/Releases
Ash Piles Area	There are no known spills or releases from the historic ash piles area and none known to be reported to the State of Michigan. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on spills or releases.
Railroad Loop Area	There are no known spills or releases from this area and none known to be reported to the State of Michigan. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on spills or releases.

6. Record/Knowledge of Structural Instability

In accordance with Section §257.75(c)(1)(vi), any record or knowledge of structural instability of each CCR management unit are as follows:

CCRMU Name	Description of Known Structural Instability
Ash Piles Area	The small ash piles appear to be stable and not anticipated to be susceptible to instabilities.
Railroad Loop Area	The flat area of this unit appears to be stable and has no significant slope and, therefore, not anticipated to be susceptible to instabilities

7. Record/Knowledge of Groundwater Contamination Associated with CCRMU

In accordance with Section §257.75(c)(1)(vii), any record or knowledge of groundwater contamination associated or potentially associated with each CCR management unit are as follows:

CCRMU Name	Description of Known Groundwater Contamination
Ash Piles Area	There are no known historical groundwater monitoring wells in the vicinity of the ash piles. STS Hydropower has not received records concerning this CCRMU from Consumers Energy with respect to historical groundwater monitoring. However, STS Hydropower installed new groundwater monitoring wells over a period from November 2024 to August 2025 at the Morrow CCR Impoundment for compliance with the Legacy CCR Rule, surface impoundment requirements and is currently conducting background monitoring per 40 CFR 257.93. Statistical evaluation and reporting of the monitoring data has not been performed to date, but concentrations of Appendix III or IV constituents listed in 40 CFR 257 above groundwater protection standards have not been detected in the data collected to date.
Railroad Loop Area	There are no known historical groundwater monitoring wells in the vicinity of the railroad loop. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy with respect to historical groundwater monitoring. However, STS Hydropower installed new groundwater monitoring wells over a period from November 2024 to August 2025 at the Morrow CCR Impoundment for compliance with the Legacy CCR Rule, surface impoundment requirements and is currently conducting background monitoring per 40 CFR 257.93. Statistical evaluation and reporting of the monitoring data has not been performed to date, but concentrations of

	Appendix III or IV constituents listed in 40 CFR 257 above groundwater protection standards have not been detected in the data collected to date.

8. Size, Including Lateral/Vertical Extents and Volume

In accordance with Section §257.75(c)(1)(viii), the size of each CCR management unit, including the general lateral and vertical dimensions and an estimate of the volume of waste contained within the unit is as follows:

CCRMU Name	Lateral Dimensions	Vertical Dimensions	Estimated Volume
Ash Piles Area	The lateral dimensions of the Ash Piles Area were determined via field survey data collected on November 10, 2025. The Ash Piles Area is made up of eleven discrete piles, and survey data was collected by taking survey points at the base of each individual pile. This data was used to define the lateral dimensions encompassed by the ash piles, which is estimated at approximately 0.1acres. [Figure C-1, **Appendix C**]	The vertical dimensions of the Ash Pile Area were determined via field survey data collected on November 10, 2025. Survey points were taken at the top of each individual pile. [Figure C-1, **Appendix C**]	Using AutoCAD software, the survey data of the lateral and vertical dimensions were integrated to produce a topographic surface for each ash pile. An additional topographic surface was produced to represent the native surface elevation of the outside slope of the CCR impoundment's western berm. A comparison of the ash pile surfaces to the native soil surface was made to generate a volume for each ash pile. The volume of all ash piles combined was estimated at approximately 260 tons.
Railroad Loop Area	Based on review of historical aerial photography and AECOM personnel site visits (on November 4, 2024 and November 10, 2025), the lateral extents of the Railroad Loop Area is defined to the east by the CCR Impoundment berm, to the north by the STS property line, the secondary sited location	The vertical extents of the Railroad Loop Area were determined through AECOM personnel investigations at the site on November 4, 2024. During an attempt to install a monitoring well in the Railroad Loop Area, surficial ash was discovered, and the AECOM personnel noted the ash to be approximately 1.5-feet	Using AutoCAD software, the lateral and vertical extents of the Railroad Loop Area were integrated to produce a topographic surface for both the bottom and top of the surficial ash layer. A comparison of these two surfaces generated a volume for the ash within the railroad loop area, which was found to be approximately 2,100

	of MW-01 where surficial ash was found to the west, and to the south by the point where the railroad loop grade meets the CCR Impoundment berm. This area is estimated at approximately 0.8 acres. [Figure C-2, **Appendix C**]	thick. A secondary well location approximately 180-feet west was proposed, but a one-foot layer of surficial ash was also discovered. A third well location 40-feet further west was investigated and yielded no surficial ash upon inspection. Therefore, the vertical extents of ash within the Railroad Loop Area range in thickness from one to 1.5 feet. [Figure C-2, **Appendix C**]	tons. However, the lack of further subsurface investigations to corroborate both the estimated lateral and vertical extents of the surficial ash material in the Railroad Loop Area represents a data gap.

9. Operation Dates

In accordance with Section §257.75(c)(1)(ix), the dates when each CCR management unit first received CCR and when each CCR management unit ceased receiving CCR are as follows:

CCRMU Name	Date of First CCR Receipt	Date of Last CCR Receipt
Ash Piles Area	Unknown. Review of historical aerial photographs (see **Appendix B**) could not determine the specific timeframe for the disposal. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on first receipt of CCR. No method is available to resolve this data gap.	Unknown. Review of historical aerial photographs (see **Appendix B**) could not determine the specific timeframe for the disposal. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on last receipt of CCR. No method is available to resolve this data gap.
Railroad Loop Area	Unknown. Review of historical aerial photographs (see **Appendix B**) could not determine the specific timeframe for the disposal. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on first receipt of CCR. No method is available to resolve this data gap.	Unknown. Review of historical aerial photographs (see **Appendix B**) could not determine the specific timeframe for the disposal. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that gave information on last receipt of CCR. No method is available to resolve this data gap.

10. CCR Type(s)

In accordance with Section §257.75(c)(1)(x), the identification of all types of CCR in each CCR management unit at the facility is as follows:

CCRMU Name	Fly Ash	Bottom Ash	Other/Comments
Ash Piles Area	X	X	Assumed mix of all three as there are no records available. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that provides information on types of CCR.
Railroad Loop Area	X	X	Assumed mix of all three as there are no records available. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that provides information on types of CCR.

11. Description of Closure Activities and Applicable Drawings/Reports

In accordance with Section §257.75(c)(1)(xi), a narrative description of any closure activities that have occurred, including any applicable engineering drawings or reports is as follows:

CCRMU Name	Description of Closure Activities
Ash Piles Area	The Ash Piles Area is not closed, has no visible indication of past closure activities, and no known closure information. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that provides information on closure.
Railroad Loop Area	The Railroad Loop Area is not closed, has no visible indication of past closure activities, and no known closure information. STS Hydropower has not received any records concerning this CCRMU from Consumers Energy that provides information on closure.

12. Facility Evaluation Details/Results

In accordance with Section §257.75(c)(1)(xii), a narrative that documents the data reviewed as part of the facility evaluation process, and that lists all data and information indicating the presence or absence of CCR management units at the facility is as follows:

The documents reviewed as part of the facility evaluation process included historical aerial photographs obtained from EDR/Lightbox. These aerial photographs were collected at intervals of at least once a decade from 1938 to 2020. The review of these photographs identified two areas of unknown disturbance: a swampy area on the north bank of the Kalamazoo River, and an area inside the former railroad loop. The first area was not further investigated as a potential CCRMU as it was determined there was no physical transport connection across the Kalamazoo River from the plant and the swampy area had no other access. The second area interior to the railroad loop is potentially associated with the Railroad Loop Area identified in this report and represents a data gap for this unit.

Additional data gathered for the facility evaluation process included AECOM personnel site visits on November 4, 2024 for the installation of monitoring wells at the site, and on November 10, 2025 to conduct an inspection of the CCR Impoundment and observe various site areas. Both site visits resulted in no additional suspect areas on STS-owned properties outside of the Ash Piles Area and Railroad Loop Area previously identified.

In pursuit of other relevant data, AECOM requested records from Consumers Energy (former operator of the Morrow Power Plant) through STS Hydropower on October 20, 2025 concerning the Morrow Plant historical ash management areas. The request identified that AECOM was already aware of the Morrow CCR Impoundment but had particular interest in any other “historical management of CCR in contact with the land, generally referred to as CCR management units”. However, no additional records were provided as of the date of this report.

While conducting previous inspections of the Morrow CCR Impoundment in October and December of 2024 AECOM personnel visually identified a series of ash piles located on the outside slope of the western berm for the impoundment. AECOM performed a survey of the Ash Pile Area during a site visit on November 10, 2025 to measure both the lateral and vertical extents of the eleven ash piles located on the outside slope of the CCR Impoundment’s western berm. The lateral extents were determined by obtaining surveyed coordinates around the circumference of the base of each pile, and the vertical extents were determined by obtaining surveyed coordinates at the top of each pile. This survey data was integrated into AutoCAD modeling software and used to generate separate topographic surfaces for each pile. An additional topographic surface was produced to represent the native surface soils of western berm that underlay the Ash Piles Area. A comparison of the ash pile surfaces to the native soil surface using AutoCAD software generated an approximate volume for each of the eleven piles. An illustration of the Ash Pile Area survey is shown in **Figure C-1** of **Appendix C**. During the initial event to install monitoring wells at various locations around the Morrow CCR Impoundment on November 4, 2024, surficial ash material was encountered during the drilling of proposed monitoring well MW-01 to a depth of 1.5-feet. The initial placement of MW-01 was abandoned due to the presence of ash material, and a secondary location approximately 180-feet west was chosen as the new installation point. However, surficial ash material was again discovered at this location to a depth of approximately one foot. A third location approximately 40-feet west was found to be clean of any surficial ash material, and as such became the final installation location for MW-01. In order to approximate the lateral extent of the surficial ash

encountered at the two failed MW-01 installation points, AECOM reviewed historical aerial photographs and site personnel field notes. It was determined that the approximate lateral boundaries of the surficial ash material in the Railroad Loop Area were the STS property line to the north, the CCR impoundment berm to the east, the secondary MW-01 installation point to west, and the intersection of the railroad loop grade and the impoundment berm to the south. The vertical extents of the Railroad Loop Area were documented by the field notes of the AECOM personnel installing the monitoring wells, which outlined the ash thickness as 1.5-feet in the eastern area that tapered to a depth of one-foot towards the western side. An illustration of the investigative steps to determine the lateral extents of surficial ash material in the Railroad Loop Area is shown in **Figure C-2** in **Appendix C.**

13. Supporting Information

In accordance with Section §257.75(c)(1)(xiii), the supporting information used to identify and evaluate CCR management units at the facility are found in their respective appendices for each section of the Facility Evaluation Report, Part 1 to which they correspond (refer to **Appendices A** through **C**). The supporting information includes but is not limited to construction diagrams, engineering drawings, permit documents, waste stream flow diagrams, aerial photographs, satellite images, historical facility maps, field or analytical data, groundwater monitoring data or reports, inspection reports, documentation of interviews with current or former facility workers, and other documents used to identify and evaluate CCR management units at the facility.

14. Description of Data Gaps and Plan to Remedy Gaps

In accordance with Section §257.75(c)(1)(xiv), a narrative description of any data gaps for information in Sections 1 through 13 of this report not available in existing information collection records and a plan for remedying identified data gaps through a physical examination of the facility, including any field or laboratory work needed to remedy data gaps in the Facility Evaluation Report Part 1 record, is included below. The plan includes the major milestones needed to fill the identified data gaps (e.g., a physical examination of the facility, sampling of media, measurements of CCR concentrations in and around the unit or physical presence, delineation of CCR management unit(s)) and dates to complete such needed tasks. Also, as necessary and timely, any updates to data gap remedy plans must be added to the public record during the Facility Evaluation Report Part 1.

CCRMU Name	Description of Data Gap
Railroad Loop Area	Over the course of this assessment, it was determined that the exact lateral and vertical extents of surficial ash material

	located within the Railroad Loop Area were unknown, and therefore the total estimated CCR material within this unit cannot be reliably estimated.

The plan to remedy the identified data gap for this unit is to conduct further physical examinations within the area by excavating test pits and/or utilizing a hand auger in a grid pattern that propagates west and south from the known surficial ash locations. Any location where surficial ash was discovered would be recorded with coordinates and ash depth. This investigative approach would continue until test pits or core auger locations produced no surficial ash in the subgrade. Based on findings of the initial test pits or auger locations, additional locations may be advanced to further delineate the depth and extent of surficial ash material if necessary. It is anticipated that the ash material depths in this area will be shallow based on known depths at the original MW-01 siting locations. The field investigation is planned to be conducted in the second and third quarters of 2026. As necessary and timely, any updates to the data gap remedy plan will be added to the public record during the FER Part 1. The results of additional investigations and evaluations will be provided in the FER Part 2.

Based on the review of survey data collected for the Ash Piles Area as well as the visual inspection of the piles conducted during the site visit on November 10, 2025, the lateral and vertical delineation of the piles are known and therefore does not represent a data gap for this report. No further physical examinations or data collection is required for the Ash Piles Area at this time.

15. Engineer's Certification

The owner or operator of any facility regulated under this subpart must obtain a certification from a qualified professional engineer stating that the Facility Evaluation Report Part 1 meets the requirements of paragraph (c)(1) of 40 CFR 257.75.

I hereby certify to the best of my knowledge that this Facility Evaluation Report, Part 1 was prepared to meet the requirements of paragraph (c)(1) of the Legacy CCR Rule, Section 257.75 (40 CFR 257.75(c)(1)).

I am a duly licensed Professional Engineer under the laws of the State of Michigan.

2/9/2026

Signature Date

Jared E. Taylor, PE
Michigan PE License 6201316115

16. Owner, Operator, or Authorized Representative Certification

The owner or operator of any facility regulated under this subpart must certify the Facility Evaluation Report Part 1 required by paragraph (c)(1) of the Legacy CCR Rule, Section 257.75 (40 CFR 257.75(c)(1)) with the following statement signed by the owner or operator or an authorized representative:

> "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signature Date

Printed Name

Title

Limitations

This report describes the results of AECOM's Facility Evaluation Report Part 1 to identify the presence or absence of CCR management units, as identified and defined in the U.S. EPA Legacy CCR Rule, 40 CFR 257 affecting the site within the limits of the facility

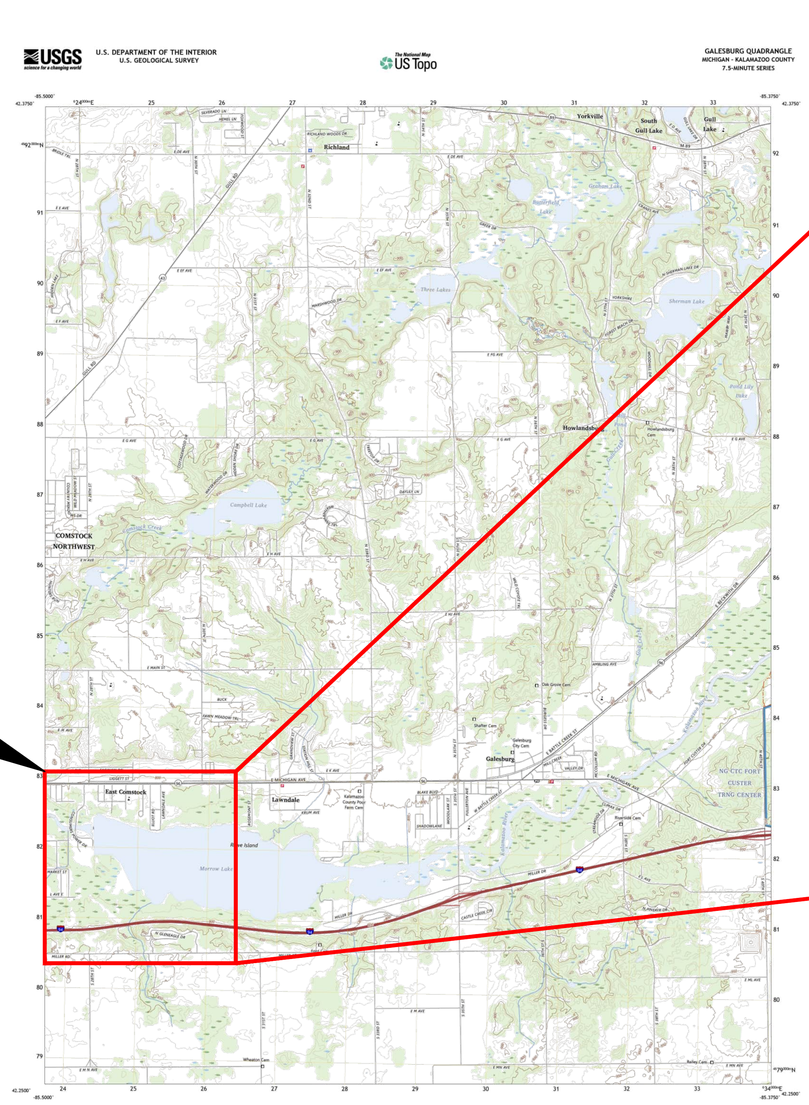
As with any due diligence assessment, there is a certain degree of dependence upon information provided by facility or site and regulatory agency representatives, which is not readily verifiable through visual observations or supported by any available written documentation. AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this assessment was performed. In addition, the findings and opinions expressed in this report are subject to certain conditions and assumptions, which are noted in the report. Any party reviewing the findings of the report must carefully review and consider all such conditions and assumptions.

This report and all field data, notes, and documentation were gathered and/or prepared by AECOM in accordance with the generally accepted engineering and scientific practice in effect at the time of AECOM's assessment of the subject property. The statements, findings and opinions contained in this report are only intended to give approximations of the CCR management units at the facility,

List of Appendices

Appendix A – Location of CCR Management Units

APPENDIX A
LOCATION OF CCR MANAGEMENT UNITS



SITE LOCATION

UNIT TYPE	UNIT NAME	ID NUMBER
CCRMU	ASH PILES AREA	1
CCRMU	RAILROAD LOOP AREA	2

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AECOM

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REGISTRATION

ISSUE/REVISION

I/R	DATE	DESCRIPTION

AECOM PROJECT NO:	60738676
DRAWN BY:	
DESIGNED BY:	
CHECKED BY:	
PLOT DATE:	
SCALE:	AS SHOWN
AUTOCAD VER:	2018

PROJECT NUMBER
60738676

SHEET TITLE
APPENDIX A
LOCATION OF CCR
MANAGEMENT UNITS

SHEET NUMBER

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Appendix B – Historical Aerial Photography

- B-1 The EDR Aerial Photo Decade Package, November 14, 2024

Morrow CCR Impoundment

6900 E Michigan Avenue

Comstock Township, MI 44084

Inquiry Number: 7818605.1

November 14, 2024

The EDR Aerial Photo Decade Package

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

11/14/24

Site Name:

Morrow CCR Impoundment
6900 E Michigan Avenue
Comstock Township, MI 44084
EDR Inquiry # 7818605.1

Client Name:

AECOM
717 17th Street
Denver, CO 80202
Contact: Quinn Kilty

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

Year	*Scale*	*Details*	*Source*
2020	1"=875'	Flight Year: 2020	USDA/NAIP
2016	1"=875'	Flight Year: 2016	USDA/NAIP
2012	1"=875'	Flight Year: 2012	USDA/NAIP
2009	1"=875'	Flight Year: 2009	USDA/NAIP
2006	1"=875'	Flight Year: 2006	USDA/NAIP
1999	1"=875'	Acquisition Date: April 13, 1999	USGS/DOQQ
1986	1"=875'	Flight Date: August 30, 1986	USDA
1973	1"=875'	Flight Date: September 01, 1973	USGS
1965	1"=875'	Flight Date: January 01, 1965	USGS
1961	1"=875'	Flight Date: May 10, 1961	USGS
1955	1"=875'	Flight Date: July 12, 1955	USDA
1946	1"=875'	Flight Date: December 01, 1946	USGS
1938	1"=875'	Flight Date: June 08, 1938	USDA

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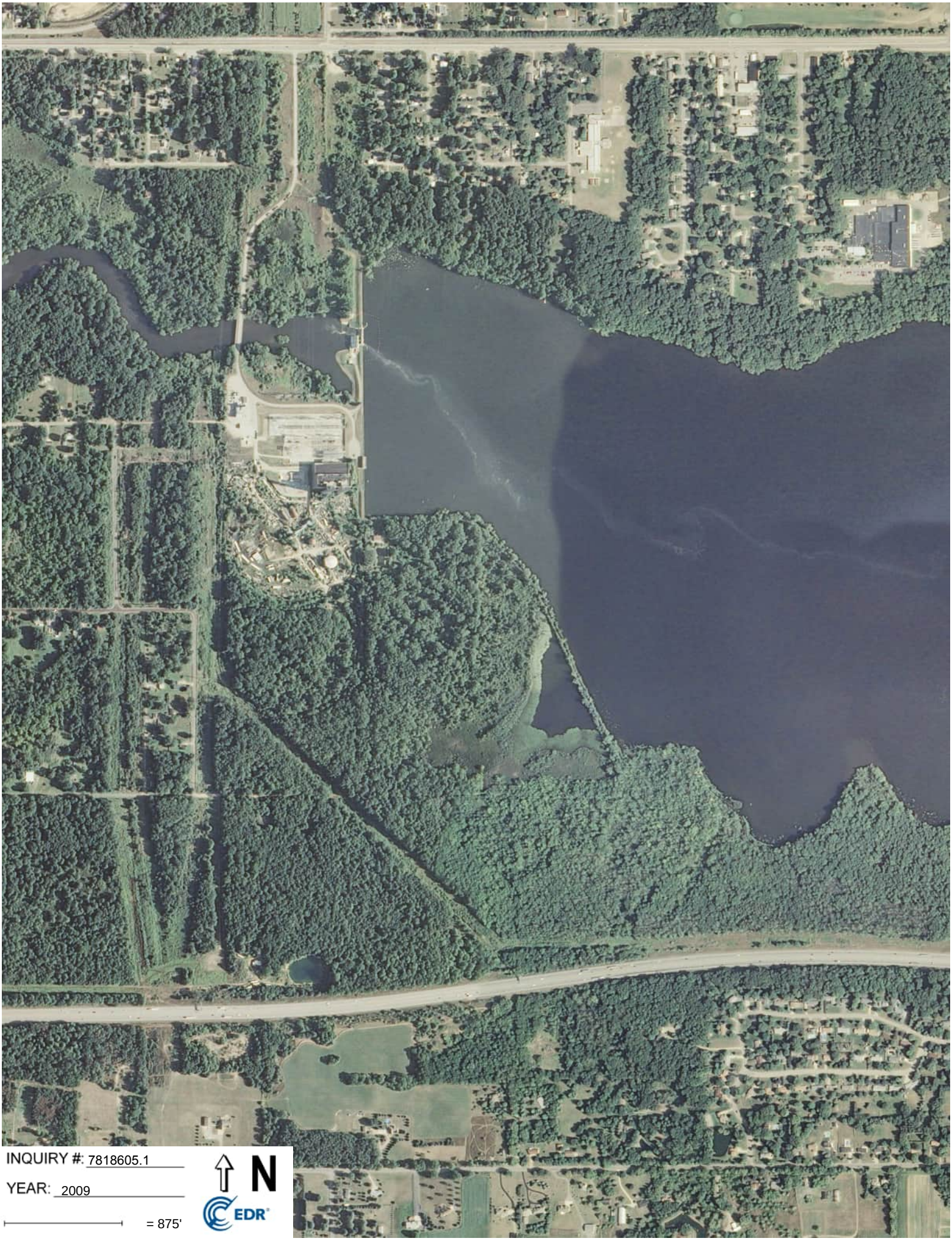
INQUIRY #: 7818605.1
YEAR: 2020
= 875'
N
EDR


INQUIRY #: 7818605.1
YEAR: 2016
= 875'
N
EDR


INQUIRY #: 7818605.1
YEAR: 2012
= 875'
N
EDR



INQUIRY #: 7818605.1

YEAR: 2009

= 875'

N

EDR


INQUIRY #: 7818605.1
YEAR: 2006
= 875'
N
EDR

INQUIRY #: 7818605.1

YEAR: 1999

= 875'

N

EDR


INQUIRY #: 7818605.1
YEAR: 1986
= 875'
N
EDR


INQUIRY #: 7818605.1
YEAR: 1973
= 875'
N
EDR

INQUIRY #: 7818605.1

YEAR: 1965

= 875'

N

EDR

Subject boundary not shown because it exceeds image extent or image is not georeferenced.

INQUIRY #: 7818605.1

YEAR: 1961

= 875'

N

EDR

INQUIRY #: 7818605.1

YEAR: 1955

= 875'

N

EDR

INQUIRY #: 7818605.1

YEAR: 1946

= 875'

N

EDR

INQUIRY #: 7818605.1

YEAR: 1938

= 875'

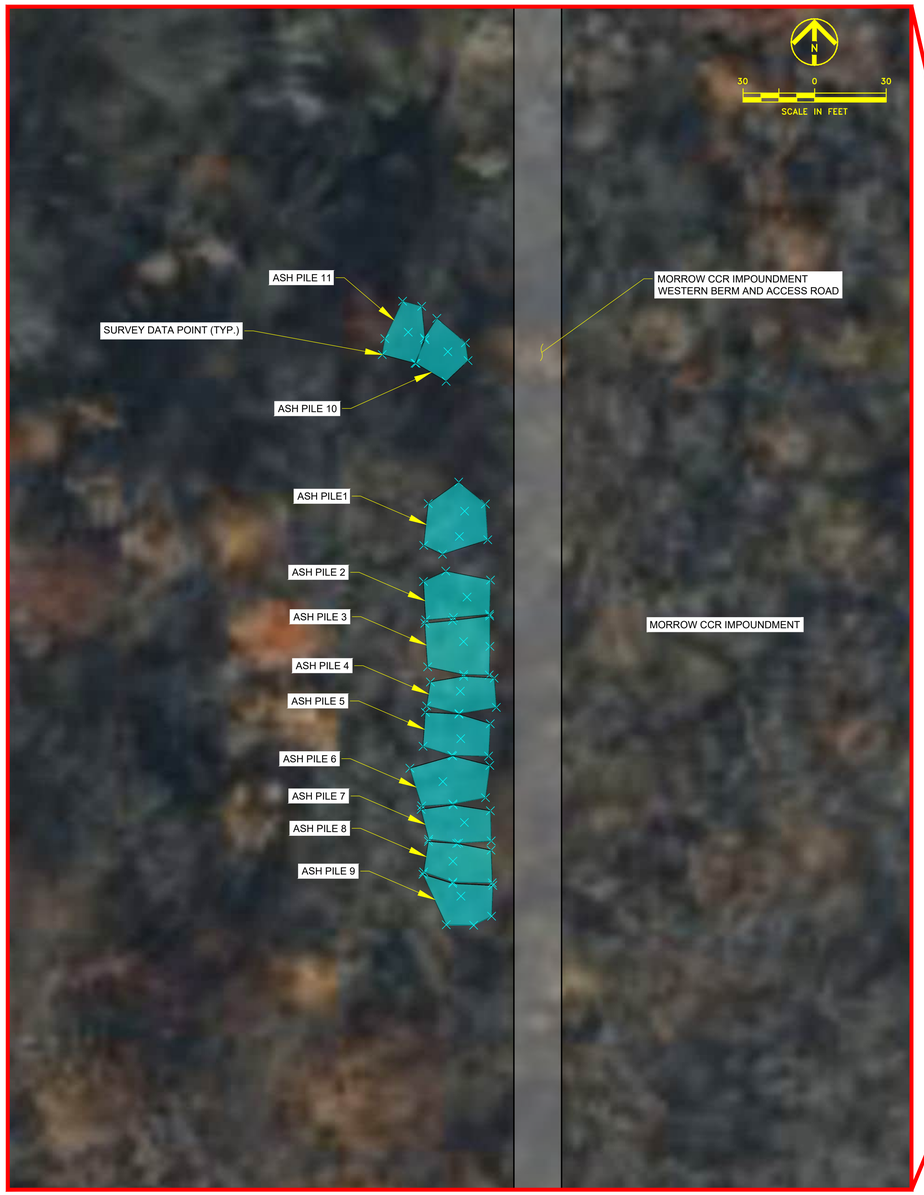
N

EDR

Appendix C – References for Section 8, Size, Including Lateral/Vertical Extents and Volume

- Figure C-1 Ash Piles Area
- Figure C-2 Railroad Loop Area

FIGURE C-1
ASH PILES AREA



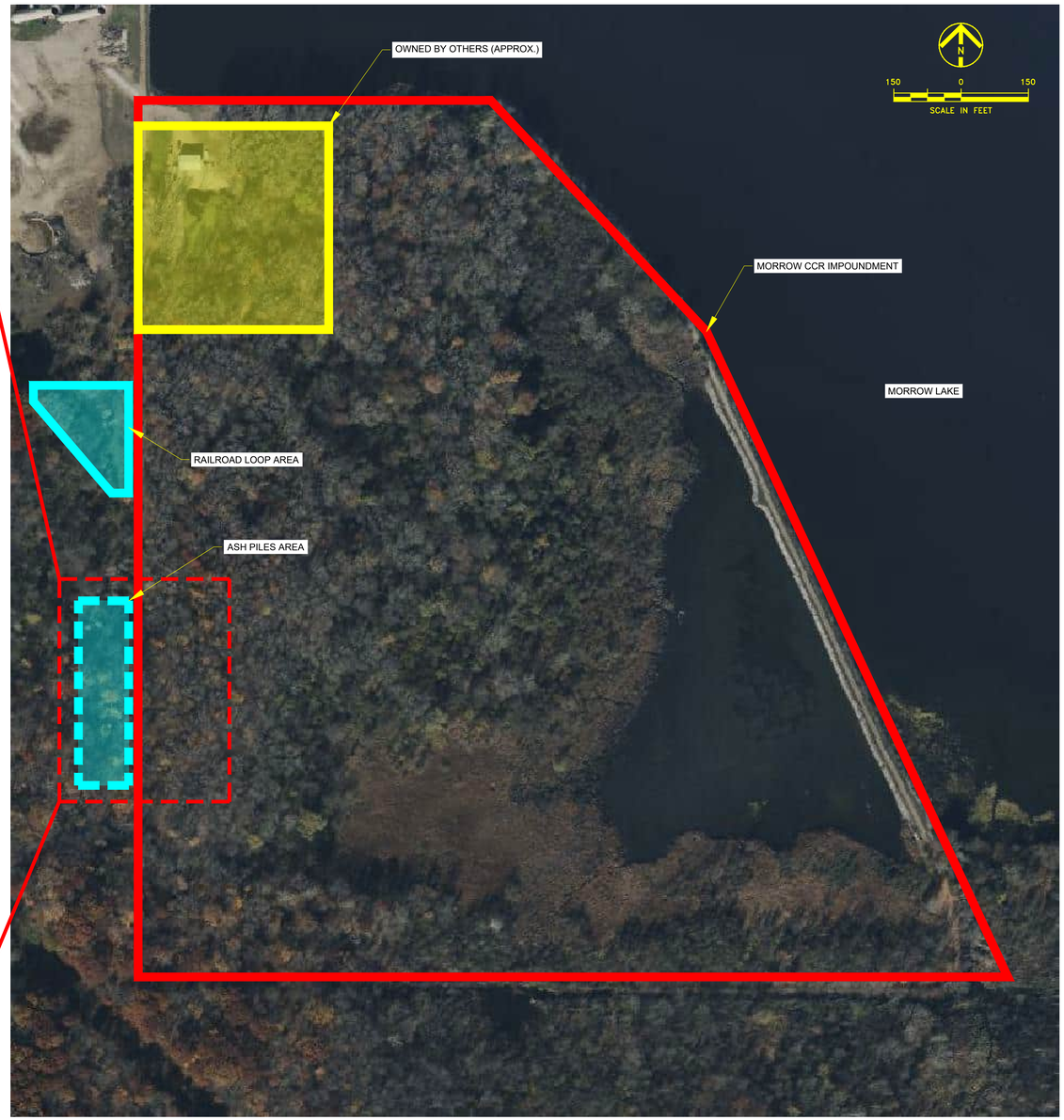


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FIGURE C-1
ASH PILES AREA

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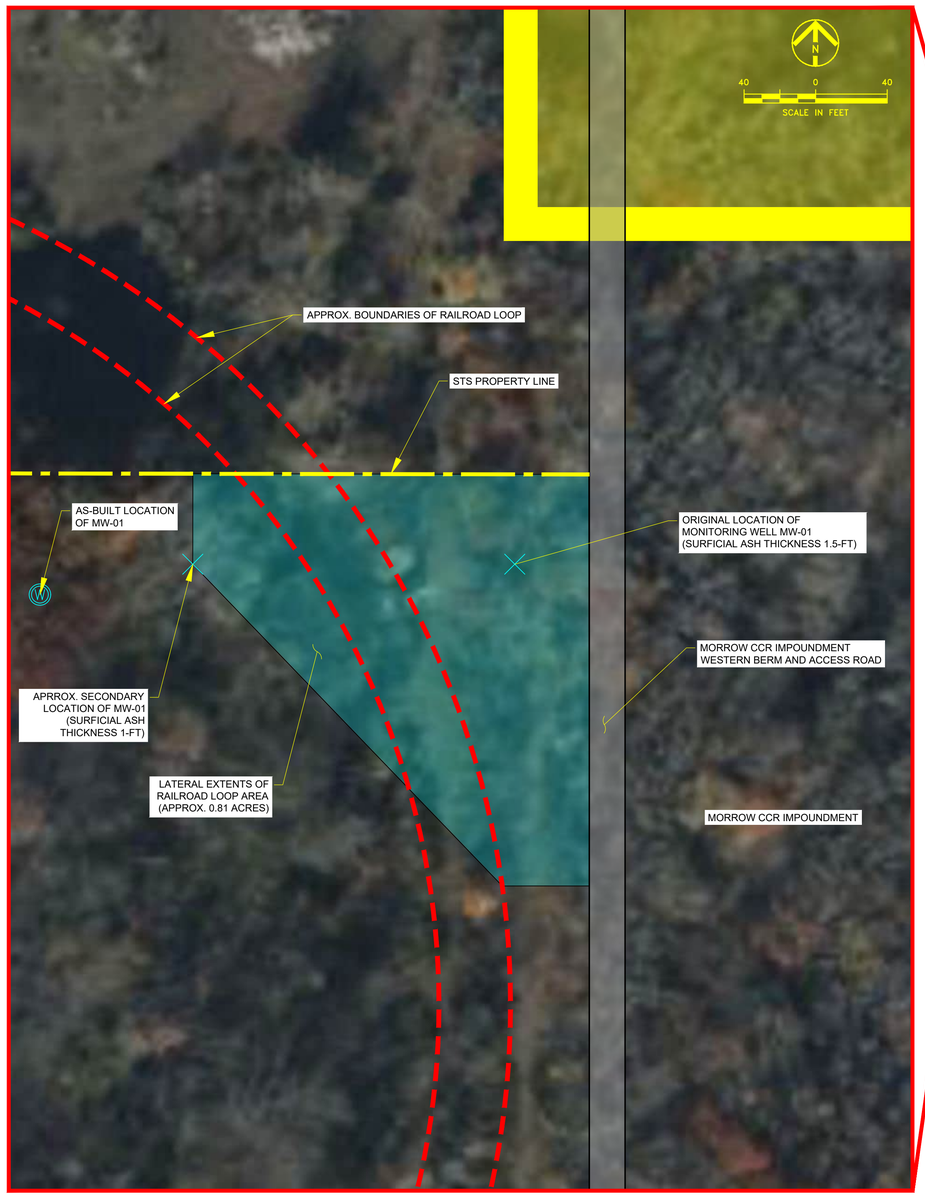
FIGURE C-2
RAILROAD LOOP AREA



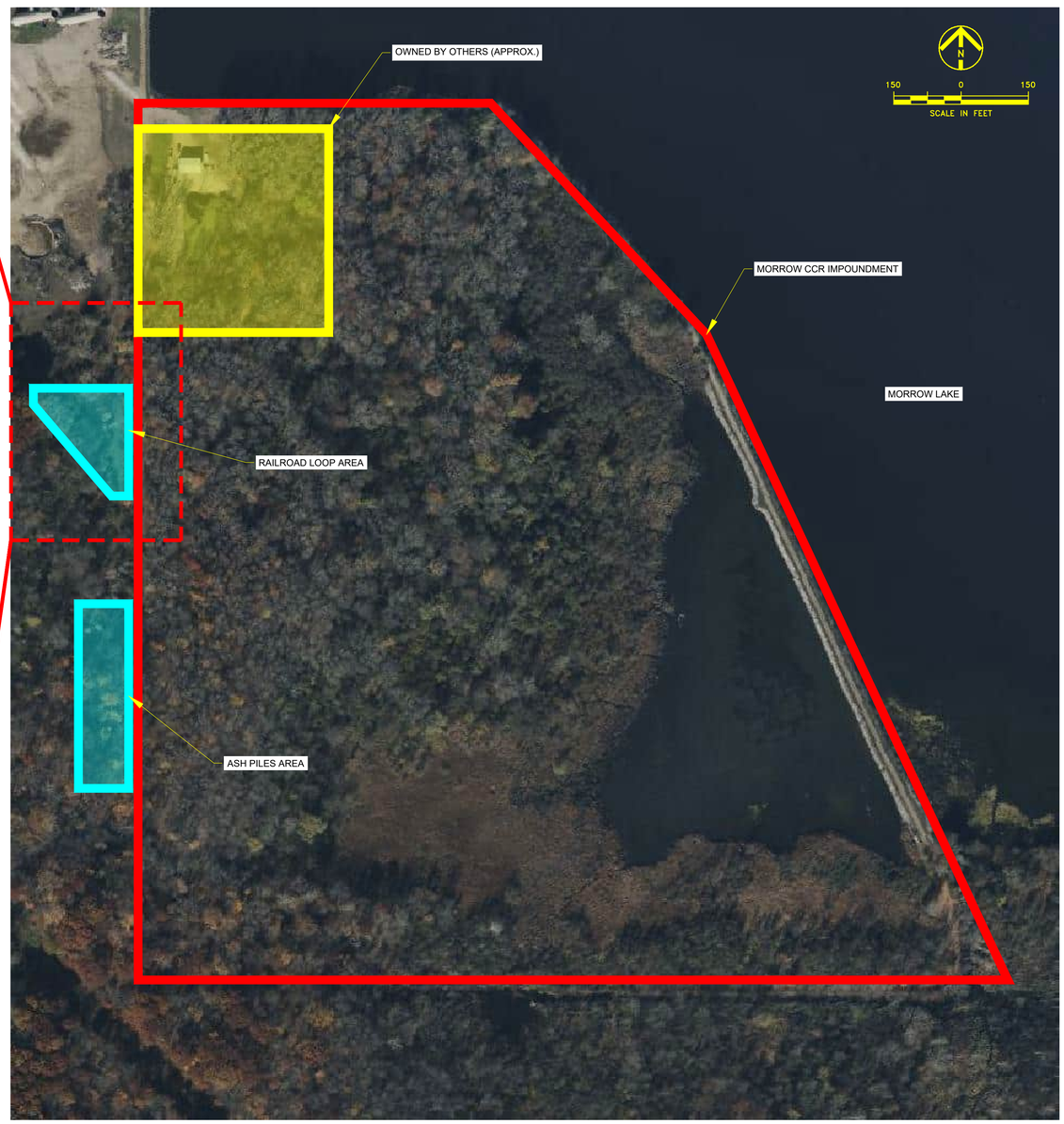


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FIGURE C-2
RAILROAD LOOP AREA

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