Construction Quality Assurance Report
Placement of Category II and Category III Material at East Property Stockpile

Former ASARCO Smelter, El Paso, Texas

February 2017

Report Prepared for Project Navigator, LTD (Trustee) By:

Arcadis U.S., Inc.
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Suite 1000
Phoenix, AZ 85008
602-438-0883
Table of Contents

Contents

1. Introduction 1-1
   1.1. Objective ........................................................................................................... 1-1
   1.2. Project Description ............................................................................................ 1-1

2. Construction Activities 2-1
   2.1. Best Management Practices/Storm Water Pollution Prevention Plan ... 2-1
   2.2. Debris & Vegetation Removal/COC Screening of Subgrade .................. 2-1
   2.3. Subgrade Preparation ....................................................................................... 2-1
   2.4. Cat II Fill Placement ......................................................................................... 2-1
   2.5. Future Clean Cover Fill Placement .................................................................. 2-2

3. Deficiencies, Issues 3-1

4. Conclusion 4-1

5. References 5-1

Tables

Table 1 Summary of Laboratory Testing of Fill

Figures

Figure 1 ASARCO Remediation Project East I-10 Category II/III Stockpile Design
Figure 2 East Property Category II and III Material Map, January 15, 2014

Appendices

A Storm Water Pollution Prevention Plan
B Photo Documentation
Acronyms

AA  Assessment Area
BMPs  Best Management Practices
Cat II and III  Category II and III
CES  Construction and Environmental Services
COC  Constituent of Concern
CQA  Construction quality assurance
ET  Evapotranspirative
MPI  Malcolm Pirnie, Inc.
PCLs  Protective Concentration Levels
Site  Former ASARCO Smelter Site
TCEQ  Texas Commission on Environmental Quality
TRRP  Texas Risk Reduction Program
XRF  X-Ray Fluorescence
1. Introduction

1.1. Objective

This construction quality assurance (CQA) report has been developed on behalf of the Texas Custodial Trust to summarize the activities performed by Arcadis Construction and Environmental Services (CES), documented by Arcadis U.S., Inc. (Arcadis), formerly Malcolm Pirnie, Inc. (MPI) for the placement of Category II and III (Cat II and III) fill at a stockpile in the East Property, located at the Former ASARCO Smelter Site in El Paso, Texas (Site).

This report has been prepared in accordance with and meets the requirements as stated in:

- A letter to Texas Commission on Environmental Quality (TCEQ) dated January 23, 2014 regarding Location of Category II/III Stockpile on East Property (MPI, 2014a) and approved by TCEQ on February 5, 2014 (TCEQ, 2014)
- A letter to TCEQ dated February 12, 2014 regarding Amendment to Storm Drain Pollution Control Permit for East Borrow Source and Storm Water Pollution Prevention Plan dated 12/14/2012 (Permit No. SUSP13-00258) (MPI, 2014b)

1.2. Project Description

The Former ASARCO Smelter is located within the limits of El Paso, Texas. The main smelter site occupied an area of approximately 120 acres bounded by U.S. Interstate Highway 10 (I-10) on the east and U.S. Highway 85 (Paisano Drive) on the west as shown on the Site Vicinity Map inset on Figure 1.

The project was completed within the East Property Assessment Area (AA). The scope of work involved:

1) removal of Cat II and III material from the location shown on Figure 2;
2) confirmation sampling to demonstrate that concentrations of metals in remaining soil were below Texas Risk Reduction Program (TRRP) Protective Concentration Levels (PCLs) for direct contact with commercial/industrial soil and for direct contact with residential soil;
3) placement of a demarcation fabric to indicate the clean soil surface if needed in the future; and
4) placement of Cat II and III material from various locations within the East Property AA.
The East Property stockpile design configuration initially proposed in the letter dated January, 23 2014 is shown on Figure 1. A reduced footprint is shown on Figure C-1 (Sheet 3 of 3) in the Stormwater Pollution Prevention Plan (see Appendix A). The final cover and drainage system is described in Section 2.5 and will be constructed in 2017. Cover construction activities will be summarized in the 2017 Soil Response Action Completion Report that will be prepared in late 2017.
2. Construction Activities

2.1. Best Management Practices/Storm Water Pollution Prevention Plan

Best Management Practices (BMPs) construction activities began on February 14, 2014 in accordance with the Storm Water Pollution Prevention Plan and associated Stormwater Construction General Permit presented in Appendix A. To control erosion, silt fencing was erected using metal posts, rip rap was placed, and rock berms were constructed. Representative photos of silt fence installation (one of the BMPs used during construction) are presented in Photos 1 and 2 of the photolog in Appendix B.

2.2. Debris & Vegetation Removal/COC Screening of Subgrade

After debris piles and vegetation were removed, field screening of the subgrade soil for metals was conducted using an X-Ray Fluorescence (XRF) instrument. Subgrade soil sample locations were established by creating 50 by 50 foot grids within the stockpile footprint. Where Constituent of Concern (COC) concentrations exceeded TRRP Residential PCLs, material was excavated until XRF field screenings indicated the soil metals concentrations were below Residential PCLs, and then a 5-point composite soil sample was collected and sent to an analytical laboratory for final confirmation of COC concentrations. The laboratory analytical results for the final confirmation sampling are presented in a separate attachment of this Soil Response Action Completion Report (Attachment C1.2.1).

2.3. Subgrade Preparation

Prior to placement of the Cat II/III fill, subgrade surface areas were graded and roughened, and then proof rolled with a 40-ton haul truck. Upon completion of the proof rolling, a nonwoven, 6-ounce geofabric, Terratex N06, was placed over the subgrade surface to act as a demarcation layer for the Cat II and III material base. The geofabric was overlapped approximately 12 inches and staked to the subgrade to minimize movement during initial fill placement (Photos 4 through 10 in Appendix B).

2.4. Cat II Fill Placement

Fill placement began on February 17, 2014. The fill material was generated by excavating and removing Cat II and III material from the East Property Cat II removal area. The fill material included silt, clay, sand, gravel, cobbles, and slag with cobbles and slag chunks generally 12 inches or smaller in size. In general, the fill placed was a rockfill due to the high percentage (i.e., 30 to 50 percent) of material exceeding ¾ inch in size.
Approximately 108,000 cubic yards of Cat II/III fill material was placed at the East Property stockpile. The fill was placed in approximate 12-inch, loose lifts and then compacted with a Caterpillar® 815 sheepsfoot compactor (22 ton) and a Caterpillar® CS56 padfoot compactor (13 ton). Upon completion of compacting each lift, a loaded 40-ton haul truck was used to proof roll the fill surface to achieve a nonyielding surface. An Arcadis CQA engineer monitored the fill placement and compaction activities to observe and document the operations and verify that a nonyielding compacted fill surface was achieved with each lift. In addition, supplemental compaction information was completed by performing field density tests. AMEC performed field density testing with a nuclear density gauge and laboratory testing of soil samples during the fill placement. The field density tests all met or exceeded 90 percent compaction. The laboratory testing included particle size analysis, Atterberg limits, and modified proctor. Laboratory testing results are summarized in Table 1.

Representative photos of the fill placement activities are presented in Photos 11, 12, 14, and 15 in Appendix B.

2.5. Future Clean Cover Fill Placement

Future work at the Cat II/III Stockpile will include a evapotranspirative (ET) soil cover to prevent direct contact with COCs and water infiltration. The ET soil cover will be composed of 3 feet of soil from the East Borrow source area previously characterized for the cover of the Cell 4 Landfill. Design of the cover system includes drainage improvements to prevent ponding of stormwater runoff on the cover. The proposed ET soil cover may be placed in a similar fashion to the specifications of the Plant Site Final Cover.
3. Deficiencies, Issues

No deficiencies were observed during the fill placement. The only minor issues that arose were: 1) a small volume of Cat I material (material that was gray in color and/or contained debris such as bricks) was detected visually and confirmed with an XRF several times during excavation at the South Arroyo but was removed and hauled to Cell 4 for disposal; 2) one to two workers continuously monitored and removed debris and vegetation that was excavated and hauled to the fill pad; and 3) wet soil was excavated from low lying areas and mixed with drier material at the excavation location, as well as on the fill pad. When proof rolling detected fill material containing over-optimum moisture content conditions, the wet material was moisture conditioned to near optimum moisture content and recompacted.
4. Conclusion

As presented and described in this report, the East Property stockpile was completed in general conformance with the submittal letter to TCEQ dated January 23, 2014 and letter to TCEQ dated February 12, 2014 regarding Amendment to Storm Drain Pollution Control Permit for East Borrow Source and Storm Water Pollution Prevention Plan dated 12/14/2012 (Permit No. SUSP13-00258).
5. References


MPI, 2014b. Letter to TCEQ Regarding Amendment to Storm Drain Pollution Control Permit for East Borrow Source and Storm Water Pollution Prevention Plan dated 12/14/2012 (Permit No. SUSP13-00258). February 12.

TABLES
### Table 1
Summary of Laboratory Testing of Fill
East Property Category II Stockpile
Former El Paso ASARCO Smelter
El Paso, Texas

<table>
<thead>
<tr>
<th>Sample ID</th>
<th>Date Sampled</th>
<th>Gravel (%)</th>
<th>Sand (%)</th>
<th>Fines (%)</th>
<th>Liquid Limit</th>
<th>Plastic limit</th>
<th>Plasticity Index</th>
<th>Maximum Dry Density (pcf)</th>
<th>Optimum Moisture Content (%)</th>
<th>Unified Soil Classification</th>
<th>Soil Description</th>
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<tr>
<td>East Property Stockpile, TP2-010814, 0'-5'</td>
<td>1/10/2014</td>
<td>60</td>
<td>27</td>
<td>13</td>
<td>29</td>
<td>18</td>
<td>11</td>
<td>146.5 1</td>
<td>5.5</td>
<td>GC</td>
<td>Clayey GRAVEL with Sand</td>
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<td>East Property Stockpile Area, TP4-01814-2'-11'</td>
<td>1/10/2014</td>
<td>8</td>
<td>58</td>
<td>34</td>
<td>33</td>
<td>20</td>
<td>13</td>
<td>122.5</td>
<td>12.0</td>
<td>SC</td>
<td>Clayey SAND</td>
</tr>
<tr>
<td>East Property Stockpile</td>
<td>1/10/214</td>
<td>93</td>
<td>5</td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>170.0 1</td>
<td>3.5</td>
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<td>Poorly Graded GRAVEL</td>
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<tr>
<td>East Property Cat 2 Stockpile</td>
<td>2/17/2014</td>
<td>27</td>
<td>52</td>
<td>21</td>
<td>29</td>
<td>23</td>
<td>6</td>
<td>135.5 1</td>
<td>8.0</td>
<td>SM</td>
<td>Silty SAND with Gravel</td>
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<td>East Property Cat 2 Stockpile</td>
<td>2/17/2014</td>
<td>70</td>
<td>21.2</td>
<td>8.8</td>
<td>29</td>
<td>23</td>
<td>6</td>
<td>157.5</td>
<td>4.5</td>
<td>GP-GM</td>
<td>Poorly Graded GRAVEL with Silt &amp; Sand</td>
</tr>
<tr>
<td>120' E. of Southwest Corner of East Property, Cat 2</td>
<td>2/19/2014</td>
<td>73</td>
<td>17</td>
<td>10</td>
<td>30</td>
<td>17</td>
<td>13</td>
<td>167.5 1</td>
<td>4.0</td>
<td>GP-GC</td>
<td>Poorly Graded GRAVEL with Clay &amp; Sand</td>
</tr>
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<td>Cat 2 Stockpile - 022114</td>
<td>2/21/2014</td>
<td>13</td>
<td>57</td>
<td>30</td>
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<td>23</td>
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<td>-</td>
<td>NP</td>
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<td>22</td>
<td>26</td>
<td>34</td>
<td>17</td>
<td>17</td>
<td>148.5 1</td>
<td>6.5</td>
<td>GC</td>
<td>Clayey GRAVEL with Sand</td>
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<td>Cat 2 Stockpile, Silty Clay - 030414</td>
<td>3/4/2014</td>
<td>17</td>
<td>35</td>
<td>48</td>
<td>40</td>
<td>17</td>
<td>23</td>
<td>123.0</td>
<td>12.0</td>
<td>SC</td>
<td>Clayey SAND with Gravel</td>
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<td>Cat 2 Stockpile 3-31-14</td>
<td>3/31/2014</td>
<td>38</td>
<td>35</td>
<td>27</td>
<td>29</td>
<td>15</td>
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<td>137.0</td>
<td>7.0</td>
<td>SC</td>
<td>Clayey SAND with Gravel</td>
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<tr>
<td>EBS Sand</td>
<td>8/12/2015</td>
<td>0</td>
<td>83.1</td>
<td>16.9</td>
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<td>-</td>
<td>NP</td>
<td>115.6</td>
<td>12.8</td>
<td>SM</td>
<td>Silty SAND</td>
</tr>
</tbody>
</table>

Note:
pcf = pounds per cubic foot
"--" = Not Applicable

1 Rockfill material with greater than 30% of +3/4 inch rock retained.
FIGURES
Estimated Category II/III Volumes

- Outside Jurisdictional Floodplain: 65,900 cy
- Inside Jurisdictional Floodplain: 15,900 cy (5b, 9b)
APPENDIX A

STORM WATER POLLUTION PREVENTION PLAN
FOR THE COMMISSION

Issued Date: June 26, 2013

Keep with your SWP.

To obtain information on theStormwater web site at https://www2.epa.gov/watershedinnovations/swp. Also, you may call 1-800-877-6714. If you have any questions related to this permit, you may contact the Stormwater Program office by email at SWPinfo@tceq.state.tx.us or by telephone at (512) 299-8370.

This permit expires on March 05, 2018, unless otherwise amended. If you have any questions related to this permit, you may contact the

ET PASO COUNTY

EL PASO, TX 79925-1712

301 W. PASADENA DR

F!ORMER ASPARCO ET PASO SMELTER

RN0106907

Ref 0610102

Project/Site Information:

Monitor and report

Stormwater

Discharges under the

Stormwater

Construction

General Permit. All

Stormwater

Discharges must be

in compliance with

the conditions and

requirements of this

permit. You must have

processed and

implemented a Stormwater

Pollution Prevention Plan

(SWPPP) that is tailored to

your construction site as a

condition of this permit.

The SWPPP, Stormwater

Construction General

Permit Regulations require certain Stormwater Pollution Prevention and control measures, possible

TCEQ's Stormwater Construction General Permit requires certain Stormwater Pollution Prevention and control measures, possible

Covered Effective: September 19, 2011

TXR-52975

Construction activity under the Stormwater Permit 7XRR52975 is acknowledged. Your facility's TIPDS stormwater discharge elimination system(TIPDS) stormwater

Tex-Pollutant Discharge Elimination System TIPDS) is acknowledged by the Texas Pollutant

Discharge Elimination System (TPDES) stormwater

The Notice of Intent (NOI) for the facility listed below was received on May 31, 2013. The intent to discharge Stormwater associated with

Stormwater Construction General Permit

Texas Pollutant Discharge Elimination System

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
June 26, 2013

Dear Applicant:

Re: TPDES General Permit for Construction Storm Water Runoff (TXR1500000)
    Notice of Intent Authorization

Your Notice of Intent application for authorization under the general permit for discharge of storm water associated with construction activities has been received. Pursuant to authorization from the Executive Director of the Texas Commission on Environmental Quality, the Division Director of the Water Quality Division has issued the enclosed Certificate.

Please refer to the attached certificate for the identification number that was assigned to your project/site and the coverage effective date. Please use this number to reference this project/site for future communications with the Texas Commission on Environmental Quality (TCEQ).

Authorization under the Edwards Aquifer Protection Program is required before construction can begin where the site is located within the Edwards Aquifer Recharge Zone, Contributing Zone, or Contributing Zone within the Transition Zone. See http://www.tceq.texas.gov/compliance/field_ops/eapp/program.html for additional information.

A Notice of Termination must be submitted when permit coverage is no longer needed. You may obtain a Notice of Termination form at the website listed below.

For questions related to the status or processing of your application you may contact the Storm Water Processing Center by email at SWPERMITT@tceq.texas.gov or by telephone at (512) 239-3700.

If you have any questions regarding coverage under this general permit or other technical issues, you may contact the storm water technical staff at (512) 239-4671 or by email at swgp@tceq.texas.gov. Also, you may obtain information on the storm water web site at www.tceq.texas.gov. Permit and application status information can be found on the TCEQ web site at http://www5.tceq.texas.gov/wq_dpa/.

Sincerely,

David W. Galindo

David W. Galindo, Director
Water Quality Division
Texas Commission on Environmental Quality
February 12, 2014

Mr. Kareem Dallo P.E.
Mr. Noe Moya
Tillman Building
222 S. Campbell Street
El Paso, Texas 79901

Re: Texas Custodial Trust
Former ASARCO Smelter Site

Subject: Amendment to Storm Drain Pollution Control Permit for East Borrow Source

Dear Messrs. Dallo and Maya:

On behalf of the Texas Custodial Trust, enclosed please find Malcolm Pirnie’s amendment to the Storm Drain Pollution Control Permit for remediation activities at the Former ASARCO Smelter Site in El Paso, Texas, east of the Interstate Highway 10 (I-10). The amendment is in reference to Permit No. SUSP13-00258.

Amendments to the current permit include the addition of a Category II/III material stockpile within the East I-10 property area, west of the Category I material excavation area shown in the Storm Water Prevention Plan dated 12/14/2012. The addition of the stockpile will not affect the original quantity of material permitted and is part of the ongoing remediation activities for the East property area.

This submittal contains the following:
- Storm Water Pollution Prevention Plan for East I-10 Category II/III Material Placement drawings (2 copies)
- Acknowledgement of Receipt and Notice to Proceed for Category II/III Stockpile on East Property from the Texas Commission on Environmental Quality

If you have any questions regarding this submittal please call me at 915-249-8658.

Very truly yours,

MALCOLM PIRNIE, INC.

Bill Sabatka
Project Environmental Engineer

Attachments

Solutions for Life™
February 5, 2014

Mr. Roberto Puga, P.G.
Trustee, Texas Custodial Trust
Project Navigator, Ltd.
One Pointe Drive, Suite 320
Brea, CA 92821

Re: Acknowledgment of Receipt and Notice to Proceed
Location and Configuration of Category II/III Stockpile on East Property, dated
January 23, 2014
Former ASARCO Smelter site, El Paso, Texas
TCEQ SWR No. 31235; EPA ID No. TXD990757668; Customer No.
CN603597782; Regulated Entity No. RN100219021

Dear Mr. Puga:

The Texas Commission on Environmental Quality (TCEQ) Remediation Division and
the US Environmental Protection Agency (USEPA) acknowledges receipt of the above
referenced submittal dated January 23, 2014, proposing the location and configuration
of a stockpile on the East Property for storage of Category II and III material. According
to the January 23 2014 submittal, existing Category II and III materials on the East
Property are proposed to be consolidated into the stockpile for the purpose of removing
the material from existing drainage pathways and to support the cleanup of the
remaining areas of the East Property to residential standards. An interim, 1-foot thick
soil cover is proposed to be placed over the entire area of the stockpiled material. Toe
ditches will also be constructed to route surface water to the north or south arroyo and
Best management Practices (BMPs) will be installed at the toe of slope and other areas
to control erosion. This letter provides Project Navigator, Ltd. with authorization and
notice to proceed with the activities as presented in the January 23, 2014 submittal. The
TCEQ and EPA require submittal of an interim report documenting the construction
activities associated with the East Property stockpile within sixty (60) days of
completion of the installation of the interim soil cover, toe ditches and BMPs to control
erosion.

Please be aware that it is the continuing obligation of persons associated with a site to
ensure that municipal hazardous waste and industrial solid waste are managed in a
manner which does not cause the discharge or imminent threat of discharge of waste
into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 Texas Administrative Code (TAC) §335.4. If the activities described in the January 23, 2014 submittal fail to comply with these requirements, please take any necessary and authorized action to correct such conditions. A TCEQ field inspector may conduct an inspection of the site to determine compliance with the January 23, 2014 submittal.

Questions concerning this letter should be directed to me at (512) 239-6542. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the USEPA and local TCEQ Region 6 Office.

Sincerely,

Eleanor T. Wehner, P.G.
Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

ETW/mdh

cc:  Mr. Scott M. Brown, P.E., Project Manager, Malcolm Pirnie, Inc., 410 N. 44th Street, Suite 1000, Phoenix, AZ 85008
      Mr. Charles Fisher, Superfund Division, U.S. EPA Region 6 (Mail Code 6SF-RA), 1445 Ross Ave, Dallas, TX 75202 Dallas
      Ms. Lorinda Gardner, Region Director, TCEQ Region 6 Office, El Paso
TEMPORARY SEDIMENT CONTROL FENCE

ROCK BERM FOR PERIMETER STOCKPILE AREAS

ROCK BERM AT VEHICLE CROSSING

RIP RAP PROTECTION

CONSTRUCTION ENTRANCE

NOT TO SCALE

TEXAS CUSTODIAL TRUST
EAST I-10 CATEGORY II/III
MATERIAL PLACEMENT
EL PASO, TEXAS

CIVIL DETAILS

SCALE: AS NOTED
### Photo No. 1
**Date:** 2-14-14  
**Direction Photo Taken:** View North

**Description:**  
Silt fence construction begins along east-central limit of work area.

### Photo No. 2
**Date:** 2-14-14  
**Direction Photo Taken:** View SW

**Description:**  
Silt fence being erected in SW portion of project area.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>2-19-14</td>
<td>View NE</td>
<td>View NE of vegetation removal in NE portion of Stockpile area.</td>
</tr>
<tr>
<td>4</td>
<td>2-14-14</td>
<td>View NE</td>
<td>40T haul truck proofrolling subgrade surface in NW portion of Stockpile area prior to placing nonwoven geofabric.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
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<td>------------</td>
<td>-----------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>5</td>
<td>2-19-14</td>
<td>View NE</td>
<td>40T haul trucks proofrolling subgrade surface of NE portion of Stockpile prior to placing geofabric.</td>
</tr>
<tr>
<td>6</td>
<td>2-17-14</td>
<td>View NE</td>
<td>Geofabric being placed over subgrade in north-central portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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<tr>
<td>7</td>
<td>2-17-14</td>
<td>View SW</td>
<td>Installing geofabric in NW portion of Stockpile area.</td>
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<td>2-17-14</td>
<td>View SW</td>
<td>Close-up of approximate 12” overlap of geofabric.</td>
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<td>Date</td>
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<td>Description</td>
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<tr>
<td>9</td>
<td>2-17-14</td>
<td>View SW</td>
<td>Wood stakes used to hold geofabric in-place.</td>
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<tr>
<td>10</td>
<td>2-17-14</td>
<td>View north</td>
<td>View of geofabric being rolled out and staked to the subgrade in the north portion of the Stockpile area.</td>
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<td>Date</td>
<td>Direction Photo Taken</td>
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<td>2-17-14</td>
<td>View NE</td>
<td>Dozer spreading fill over geofabric in north portion of Stockpile area.</td>
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<td>12</td>
<td>2-18-14</td>
<td>View north</td>
<td>Cat 815 sheepsfoot compactor compacting fill material.</td>
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<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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<td>13</td>
<td>2-18-14</td>
<td>View NE</td>
<td>Crew rolling out geofabric over subgrade along NW portion of Stockpile area.</td>
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<td>14</td>
<td>2-18-14</td>
<td>View NW</td>
<td>4k gallon watertruck moisture conditioning first lift during placement.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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<td>------------------------</td>
<td>-------------------------------------------------------------------</td>
</tr>
<tr>
<td>15</td>
<td>2-18-14</td>
<td>View NE</td>
<td>Fill placement advancing south in the NW portion of the Stockpile area.</td>
</tr>
<tr>
<td>16</td>
<td>2-18-14</td>
<td>View north</td>
<td>View of dozer spreading fill that contains large percentage of gravel and cobble size material.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
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<td>------------------------</td>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>17</td>
<td>2-17-14</td>
<td>View east</td>
<td>Field density test being performed on first lift of fill.</td>
</tr>
<tr>
<td>18</td>
<td>2-19-14</td>
<td>View NE</td>
<td>40T haul truck proofrolling first lift of fill in NW portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
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<td>------------------------</td>
<td>----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>19</td>
<td>2-19-14</td>
<td>View north</td>
<td>Proofrolled subgrade surface prior to placement of geofabric.</td>
</tr>
<tr>
<td>20</td>
<td>2-21-14</td>
<td>View north</td>
<td>Spreading first lift of fill over nonwoven geofabric in NE portion of Stockpile.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
<td>----------</td>
<td>------------------------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>21</td>
<td>2-21-14</td>
<td>View NW to north</td>
<td>Fill placement progression of the north portion of the Stockpile area.</td>
</tr>
<tr>
<td>22</td>
<td>2-21-14</td>
<td>View north</td>
<td>Geofabric being rolled out along the NE portion portion of the Stockpile area.</td>
</tr>
</tbody>
</table>
### Photo No. 23
**Date:** 2-22-14

**Direction Photo Taken:** View north

**Description:**
Cat 815 sheepfoot compactor compacting fill material in north portion of Stockpile area.

---

### Photo No. 24
**Date:** 2-22-14

**Direction Photo Taken:** View SW

**Description:**
View of silt fence and proofrolled subgrade surface prior to geofabric installation in the NE portion of Stockpile area.
PHOTOGRAPHIC LOG

Photo No. 25  Date: 2-22-14
Direction Photo Taken:
View SW

Description:
Field density test being performed.

PHOTOGRAPHIC LOG

Photo No. 26  Date: 2-24-14
Direction Photo Taken:
View north

Description:
View of dozer mixing wetter material with drier material during placement.
Haul truck preparing to empty its load in the central portion of Stockpile area.

Close-up photo of compacted surface and mix of soil and slag.
### Photo No. 29
**Date:** 2-27-14
**Direction Photo Taken:** View NE
**Description:**
Cat CS56 padfoot compactor compacting first lift of fill in NE portion of Stockpile area.

### Photo No. 30
**Date:** 2-27-14
**Direction Photo Taken:** View north
**Description:**
View of John Deere 850 dozer spreading approximate 12” loose lift over proofrolled surface in NE portion of Stockpile area. Note grade stakes with blue flagging set at 12”.
PHOTOGRAPHIC LOG

**Photo No. 31**
**Date:** 2-27-14
**Direction Photo Taken:** View north

**Description:**
Close-up of previous photo depicting rocky nature of fill and nonyielding surface prior to next lift being placed.

---

**Photo No. 32**
**Date:** 2-28-14
**Direction Photo Taken:** View NE

**Description:**
Proofrolled surface of rocky fill prior to placement of next lift in NE portion of Stockpile.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>33</td>
<td>3-4-14</td>
<td>View SE</td>
<td>Next approximate 12” loose lift progressing south along east side of pad.</td>
</tr>
<tr>
<td>34</td>
<td>3-5-14</td>
<td>View west</td>
<td>Cat CS56 padfoot compactor compacting east side of Stockpile pad while JD850 dozer spreads next lift along west side of pad.</td>
</tr>
</tbody>
</table>
**Photo No. 35**

**Date:**
3-11-14

**Direction Photo Taken:**
View east

**Description:**
JD 850 dozer spreading next loose lift over compacted fill surface in north half of Stockpile pad.

---

**Photo No. 36**

**Date:**
3-12-14

**Direction Photo Taken:**
View northeast

**Description:**
CS56 padfoot compactor compacting lift of Cat II material in NW portion of Stockpile area.
PHOTOGRAPHIC LOG

Photo No. 37
Date: 3-12-14
Direction Photo Taken:
View SW to NW

Description:
View from NE corner of Stockpile area of fill placement completed to date.

Photo No. 38
Date: 3-14-14
Direction Photo Taken:
View SW

Description:
Cat CS56 padfoot compactor compacting fill material in north portion of Stockpile area.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>39</td>
<td>3-15-14</td>
<td>View north</td>
<td>40T haul preparing to unload while two dozers spread lift over proofrolled fill surface in NE portion of Stockpile area.</td>
</tr>
<tr>
<td>40</td>
<td>3-15-14</td>
<td>View north</td>
<td>Loaded 40T haul truck proofrolling compacted lift in SE portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
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<td>-------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>41</td>
<td>3-15-14</td>
<td>View west-NW</td>
<td>40T haul truck travelling over recently placed fill in background to aid in compaction prior to unloading</td>
</tr>
<tr>
<td>42</td>
<td>3-15-14</td>
<td>View north</td>
<td>New lift being placed, fill stake with flagging set at 12”, and high percentage of rock in fill.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
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<td>------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>43</td>
<td>3-15-14</td>
<td>View east</td>
<td>Cat D6 dozer with GPS grading and establishing the 3:1 H:V slope on the north face of the Stockpile area.</td>
</tr>
<tr>
<td>44</td>
<td>3-15-14</td>
<td>View south</td>
<td>AMEC performing field density test in NE portion of Stockpile area.</td>
</tr>
</tbody>
</table>
**PHOTOGRAPHIC LOG**

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>45</td>
<td>3-15-14</td>
<td>View north</td>
<td>Close-up view during proofrolling with loaded 40T haul truck of compacted lift in the north portion of Stockpile area</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>46</td>
<td>3-17-14</td>
<td>View West-NW</td>
<td>Cat CS56 padfoot compactor compacting lift while dozer spreads next lift working south. 3:1 H:V slope of north face of Stockpile (right side of photo) has been graded.</td>
</tr>
</tbody>
</table>
Photo No. 47
Date: 3-17-14
Direction Photo Taken: View east
Description:
John Deere 850 dozer spreading first lift of fill over geofabric at west-central portion of Stockpile area.

Photo No. 48
Date: 3-17-14
Direction Photo Taken: View west to north of north portion of Stockpile area
Description:
Fill placement progressing on north portion of Stockpile area.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>49</td>
<td>3-17-14</td>
<td>View NW</td>
<td>Cat CS56 padfoot compactor compacting lift that is nearing finish subgrade of Cat II/III material at north edge of Stockpile area.</td>
</tr>
<tr>
<td>50</td>
<td>3-19-14</td>
<td>View west</td>
<td>Fill placement at north portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
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<td>--------------------------------------------------</td>
</tr>
<tr>
<td>51</td>
<td>3-19-14</td>
<td>View SW</td>
<td>Installing geofabric in middle and south portion of Stockpile area.</td>
</tr>
<tr>
<td>52</td>
<td>3-19-14</td>
<td>View SE</td>
<td>Fill placed over geofabric in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
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<td>-----------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>53</td>
<td>3-20-14</td>
<td>View SE</td>
<td>Loaded 40T haul truck proofrolling compacted lift in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>54</td>
<td>3-20-14</td>
<td>View west</td>
<td>View of John Deere 850 dozer spreading approximate 12” loose lift over proofrolled surface in NW portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
<td>------------</td>
<td>------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>55</td>
<td>3-20-14</td>
<td>View south</td>
<td>CAT D6N dozer with GPS spreading fill over geofabric in south portion of Stockpile area.</td>
</tr>
<tr>
<td>56</td>
<td>3-21-14</td>
<td>View east</td>
<td>AMEC performing field density test in south portion of Stockpile area.</td>
</tr>
</tbody>
</table>
**Photo No. 57**

**Date:** 3-21-14

**Direction Photo Taken:** View SE

**Description:**

Cat CS56 padfoot compactor compacting fill material in middle portion of Stockpile area.

---

**Photo No. 58**

**Date:** 3-21-14

**Direction Photo Taken:** View NW

**Description:**

Placement of Cat II material at the north portion of the Stockpile area in order to let the material dry out.
PHOTOGRAPHIC LOG

Photo No. 59  Date: 3-22-14
Direction Photo Taken:
View east

Description:
JD 850 dozer removing wet material placed in middle portion of Stockpile area.

PHOTOGRAPHIC LOG

Photo No. 60  Date: 3-22-13
Direction Photo Taken:
View NE

Description:
CAT D7E dozer with disc plow attached in order to help dry out the Cat II material.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>61</td>
<td>3-22-14</td>
<td>View east</td>
<td>Loaded 40T haul truck proofrolling compacted lift in south portion of Stockpile area.</td>
</tr>
<tr>
<td>62</td>
<td>3-24-14</td>
<td>View west</td>
<td>CAT D7E dozer with disc plow attached in order to help dry out the Cat II material that will be placed in south portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
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<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>63</td>
<td>3-24-14</td>
<td>View south</td>
<td>CAT D6N dozer with GPS spreading Cat II material in south portion of Stockpile area, directly north of Substation.</td>
</tr>
<tr>
<td>64</td>
<td>3-24-14</td>
<td>View NE</td>
<td>Loaded 40T haul truck proofrolling compacted lift in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>65</td>
<td>3-25-14</td>
<td>View NW</td>
<td>40T haul unloading Cat II material in front of dozer to spread lift over proofrolled fill surface in south portion of Stockpile area.</td>
</tr>
<tr>
<td>66</td>
<td>3-25-14</td>
<td>View SE</td>
<td>AMEC performing field density test in south portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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</tr>
<tr>
<td>67</td>
<td>3-26-14</td>
<td>View SE</td>
<td>40T haul unloading Cat II material to spread lift over proofrolled fill surface in south portion of Stockpile area directly north of Substation.</td>
</tr>
<tr>
<td>68</td>
<td>3-26-14</td>
<td>View SE</td>
<td>CAT D6N dozer with GPS spreading Cat II material (rock fill) in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
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</tr>
<tr>
<td>69</td>
<td>3-26-14</td>
<td>View SE</td>
<td>Cat CS56 padfoot compactor compacting fill material in south portion of Stockpile area.</td>
</tr>
<tr>
<td>70</td>
<td>3-27-14</td>
<td>View east</td>
<td>Loaded 40T haul truck proofrolling compacted lift (rock fill) in middle portion of Stockpile area.</td>
</tr>
</tbody>
</table>
### PHOTOGRAPHIC LOG

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>71</td>
<td>3-27-14</td>
<td>View east</td>
<td>Loaded 40T haul truck proofrolling compacted lift in access road located at</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>the middle portion of Stockpile area.</td>
</tr>
</tbody>
</table>

### PHOTOGRAPHIC LOG

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>72</td>
<td>3-31-14</td>
<td>View north</td>
<td>Close-up of Cat II material being sampled to determine maximum dry density</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>and optimum moisture content.</td>
</tr>
</tbody>
</table>
### PHOTOGRAPHIC LOG

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>73</td>
<td>3-31-14</td>
<td>View west</td>
<td>AMEC performing field density test in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>74</td>
<td>3-31-14</td>
<td>View NE</td>
<td>Dried out Cat II material from north pad being spread over proofrolled fill surface in middle portion of Stockpile area using the two dozers.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
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</tr>
<tr>
<td>75</td>
<td>4-1-14</td>
<td>View SW</td>
<td>Proofrolled lift surface after using a loaded 40T haul truck throughout the middle portion of Stockpile area.</td>
</tr>
<tr>
<td>76</td>
<td>4-1-14</td>
<td>View NE</td>
<td>AMEC performing field density test on compacted and proofrolled in middle portion of Stockpile area.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken:</td>
<td>Description:</td>
</tr>
<tr>
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<td>--------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>77</td>
<td>4-2-14</td>
<td>View SW</td>
<td>Loaded 40T haul truck proofrolling compacted lift (rock fill) in south portion of Stockpile area.</td>
</tr>
<tr>
<td>78</td>
<td>4-3-14</td>
<td>View SW</td>
<td>Cat II placement activities throughout the middle and south portion of the Stockpile area. Excavator on left side of photo is removing Cat II from Area 6 while watertruck wets material to minimize dust.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
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</tr>
<tr>
<td>79</td>
<td>4-3-14</td>
<td>View west</td>
<td>Cat II material lift being placed and spread in SW portion of Stockpile.</td>
</tr>
<tr>
<td>80</td>
<td>4-4-14</td>
<td>View west</td>
<td>SE portion of Stockpile and proofrolled compacted fill surface prior to placement of new lift of fill.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date:</td>
<td>Direction Photo Taken:</td>
<td></td>
</tr>
<tr>
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<td></td>
</tr>
<tr>
<td>81</td>
<td>4-7-14</td>
<td>View west</td>
<td></td>
</tr>
</tbody>
</table>

**Description:**

Haul truck on right side of photo proofrolling compacted lift while Cat D6 dozer with GPS spreads out a load of Cat II that was just dumped in the SW portion of Stockpile.

---

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date:</th>
<th>Direction Photo Taken:</th>
</tr>
</thead>
<tbody>
<tr>
<td>82</td>
<td>4-7-14</td>
<td></td>
</tr>
</tbody>
</table>

**Description:**

View NE of dozer spreading spreading next lift in south portion of Stockpile. In foreground, excavator loads out haul trucks with material temporarily placed in the north portion of Stockpile to be mixed/dried out before placing in the South.
Photo No. 83  Date: 4-9-14
Direction Photo Taken:
View west

Description:
Loaded haul truck proof rolling compacted lift on south portion of Stockpile.

Photo No. 84  Date: 4-9-14
Direction Photo Taken:
View NE

Description:
Cat D6 dozer with GPS spreading lift of Cat II while Cat CS56 padfoot compactor begins compacting the lift on south portion of Stockpile.
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>85</td>
<td>4-10-14</td>
<td>View NE</td>
<td>Two dozers mixing/aerating Cat II and removing oversize rock that was temporarily placed at north portion of Stockpile prior to using on south portion of Stockpile.</td>
</tr>
<tr>
<td>86</td>
<td>4-11-14</td>
<td>View SE</td>
<td>Cat D6 dozer with GPS spreading lift of Cat II material directly north of Substation in NW portion of Stockpile.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
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<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>87</td>
<td>4-15-14</td>
<td>View SE</td>
<td>40T haul truck unloading Cat II material at south portion of Stockpile while dozer spreads next lift of material over proofrolled compacted surface.</td>
</tr>
<tr>
<td>88</td>
<td>4-28-14</td>
<td>View east</td>
<td>Drainage ditch excavated at the SW portion of Stockpile, directly north of Substation.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date:</td>
<td>Direction Photo Taken:</td>
<td>Description:</td>
</tr>
<tr>
<td>----------</td>
<td>-------------</td>
<td>-------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>89</td>
<td>8-4-15</td>
<td>West</td>
<td>Dozer spreading lift of material.</td>
</tr>
<tr>
<td>90</td>
<td>8-11-15</td>
<td>East</td>
<td>Installing 24” dia. drainage pipe at SW portion of Stockpile.</td>
</tr>
<tr>
<td>Photo No</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
<td>------------</td>
<td>------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>91</td>
<td>8-13-15</td>
<td>East</td>
<td>Compacting lift of EBS sand backfill adjacent to 24” dia. drainage pipe.</td>
</tr>
</tbody>
</table>

Compacting lift of EBS sand backfill adjacent to 24” dia. drainage pipe.