



REPORT

Coal Combustion Residuals Landfill Annual Inspection

Nucla Station Ash Disposal Facility

Submitted to:

Tri-State Generation and Transmission Association, Inc.

1100 W 116th Avenue, Westminster, Colorado, USA 80234

Submitted by:

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Table of Contents

1.0 INTRODUCTION 1

 1.1 Background 1

 1.2 Facility Description 1

2.0 REVIEW OF AVAILABLE INFORMATION 2

 2.1 Information Reviewed 2

 2.2 Changes in Facility Geometry 2

 2.3 Ash Volume Contained in the Facility 3

 2.4 Changes Affecting Stability or Operation 3

3.0 VISUAL OBSERVATIONS 3

 3.1 Overview 3

 3.2 Visual Observation Terminology 3

 3.3 Findings 4

 3.3.1 Top Surface 4

 3.3.2 Embankment Crests 5

 3.3.3 Embankment Slopes 6

 3.3.4 Embankment Toes 9

 3.3.5 Stormwater Control Features 10

4.0 CONCLUSIONS AND RECOMMENDATIONS 14

5.0 REFERENCES 16

FIGURES

Photograph 1: Typical Condition of the Top Surface 5

Photograph 2: Typical Condition of Embankment Crests 6

Photograph 3: Typical Condition of Erosion Rill Repair Areas 7

Photograph 4: Typical Condition of the South Embankment Slopes 8

Photograph 5: Typical Condition of the West, North, and East Embankment Slopes 9

Photograph 6: Typical Condition of Embankment Toes 10

Photograph 7: Typical Condition of Downchute Channels	11
Photograph 8: Typical Condition of Terrace Channels.....	12
Photograph 9: Typical Condition of Perimeter Channels	13
Photograph 10: Damage to Stormwater Outfall	14

APPENDICES

Appendix A

Annual Inspection Form

1.0 INTRODUCTION

1.1 Background

Golder Associates USA Inc. (Golder), a member of WSP, has prepared this annual inspection report for Tri-State Generation and Transmission Association, Inc. (Tri-State) to summarize our review of available information and visual observation of the Nucla Station Ash Disposal Facility (the facility). Since 1987, the facility has served as the location for final deposition of coal combustion residuals (CCRs) generated at Tri-State's Nucla Station, a retired coal-fired electric generation plant that was located near Nucla, Colorado. Nucla Station was retired from service in September 2019, and demolition activities were completed in 2022.

The facility classifies as an existing CCR landfill under 40 CFR 257. The facility was closed in 2022, and a notification of closure completion was placed in the facility's operating record on June 22, 2022. The facility is now in the post-closure care period.

The purpose for Golder's review of available information and visual observation was to satisfy the requirements of 40 CFR 257.84(b)(1), which prescribes periodic completion of these activities by a qualified professional engineer to verify that the design, construction, operation, and maintenance of the facility are consistent with recognized and generally accepted good engineering practice. The visual observation by Golder's representative, Jason Obermeyer, PE, took place on December 13, 2022.

This report presents a description of the facility (Section 1.0), a summary of Golder's review of available information about the facility (Section 2.0), the findings from Golder's visual observation of the facility (Section 3.0), and Golder's conclusions and recommendations (Section 4.0).

1.2 Facility Description

The facility is located in Montrose County, approximately 5.5 miles southeast of Nucla, Colorado. Tri-State historically disposed fly ash, bottom ash, and other permitted non-hazardous utility-related wastes¹ at the facility. The Colorado Department of Public Health and Environment (CDPHE) and the Montrose County Board of Commissioners originally approved construction of the facility on a 40-acre parcel in October of 1987. Pursuant to a March 2002 application submittal, Tri-State expanded the facility laterally onto an adjacent 40-acre parcel under a Certificate of Designation granted by Montrose County in April 2004 and a Special Use Permit via Notice of Decision dated July 2005. Filling began in the expansion area in 2006. The final disposal footprint encompasses approximately 61 acres. The facility is regulated by CDPHE under 6 CCR 1007-2 Part 1, "Regulations Pertaining to Solid Waste Sites and Facilities."

Disposal of ash at the facility initially occurred behind starter dikes that encompassed the deposition area. Over time, the height of the facility was increased gradually as needed to contain the ash being generated. The height was increased with containment berms that were periodically constructed around the perimeter of the facility. Each individual containment berm was constructed atop and slightly inside of the previous containment berm to form the embankment slopes. At approximate 20-foot vertical intervals, the containment berms were inwardly offset an additional 10 feet to establish benches with terrace channels for stormwater management. The resulting composite slope is approximately 3 horizontal to 1 vertical, with a slope between benches of approximately 2.5 horizontal to 1 vertical. The design intent was that the containment berms were constructed with sufficient

¹ For simplicity, the term "ash," where used in this document, encompasses all permitted wastes.

thickness of suitable material and appropriately vegetated so that they also serve as the final cover system on the embankment slopes.

The facility received the known final receipt of waste by December 31, 2021. In 2022, a final cover system meeting the requirements of the closure plan (Golder 2022a) was constructed over the 18 acres of the facility that had yet to be closed as of that date.

2.0 REVIEW OF AVAILABLE INFORMATION

2.1 Information Reviewed

40 CFR 257.84(b)(1)(i) requires the annual inspection to include a review of information pertaining to the status and condition of the facility, including files that are available in the operating record. Golder has reviewed information provided by Tri-State to verify that the design, construction, operation, and maintenance of the facility are consistent with recognized and generally accepted good engineering practice. The information Golder has reviewed includes the following:

- the engineering design and operations report for ash disposal on the initial 40-acre parcel (Colorado-Ute Electric Association, Inc. 1987)
- the hydrogeologic investigation report for ash disposal on the initial 40-acre parcel (Western Colorado Testing, Inc. and J.F.T. Agapito & Associates, Inc. 1987)
- the design and operations report for ash disposal on the 40-acre lateral expansion parcel (Geo-Trans Inc. 2002) and addenda thereto (Golder 2017b)
- the fugitive dust control plan for the facility (Golder 2015)
- previous annual inspection reports for the facility (Golder 2016, 2017a, 2018a, 2018b, 2019, and 2020, and 2021a)
- the run-on and run-off control system plan for the facility (Golder 2021b)
- the closure plan for the facility (Golder 2022a)
- the notification of intent to close the facility (Tri-State 2022a)
- the notification of final cover completion for the facility (Tri-State 2022b) and accompanying closure certification (Golder 2022b)
- the notification of recording of notice of obligation for the facility (Tri-State 2022c)
- weekly inspection forms documenting weekly inspections conducted by qualified persons employed by Tri-State between December 8, 2021, and December 7, 2022

The weekly inspection forms provided valuable information regarding the status and condition of the facility during the last year, as well as the repair and maintenance activities that were completed. The thoroughness of the weekly inspections and documentation was found to be exceptional.

2.2 Changes in Facility Geometry

40 CFR 257.84(b)(2)(i) requires the annual inspection report to include a summary of changes in facility geometry since the previous annual inspection. The geometric design criteria, ash placement limits, and construction

methodology for the facility did not change in the last year. No CCRs were produced from power generation in the last year, but some waste that was encountered or generated at the former Nucla Station site during demolition was relocated to the facility in late 2021. Waste placement resulted in increased surface elevations within a relatively small area in the southern half of the facility.

Closure activities also resulted in changes to the facility geometry. Regrading of the top surface was performed across the southern portion of the facility to establish appropriate grades for final cover placement and stormwater management after facility closure. Soil that was previously stockpiled across the northern portion of the facility was used for grading fill and final cover material as needed for closure of the remaining 18 acres, and the remaining stockpile surfaces on the northern portion of the facility were reshaped to establish appropriate grades for long-term stability and stormwater management after facility closure. A set of culverts was added and a segment of the perimeter channel along the east side of the facility was armored with riprap to accommodate an expected increase in stormwater flows after regrading of the top surface across the southern portion of the facility.

2.3 Ash Volume Contained in the Facility

40 CFR 257.84(b)(2)(ii) requires the annual inspection report to include an estimate of the volume of CCRs contained within the facility at the time of the annual inspection. The volume of ash contained in the facility at the time of the previous annual inspection was estimated as 4,748,000 cubic yards (Golder 2021a). It is estimated that the volume of ash placed in the facility after the previous annual inspection was 2,000 cubic yards or less. Therefore, Golder estimates that the volume of ash contained within the facility at the time of the annual inspection was approximately 4,750,000 cubic yards.

2.4 Changes Affecting Stability or Operation

40 CFR 257.84(b)(2)(iv) requires the annual inspection report to include a summary of changes that may have affected the stability or operation of the facility since the previous annual inspection. Our review of the weekly inspection forms completed between December 8, 2021, and December 7, 2022, indicates that changes affecting the stability or operation of the facility have not been identified during the weekly inspections. The weekly inspection forms indicate that minor issues, such as erosion rills, are being addressed proactively. Indications of changes that affect stability or operation of the facility were not identified during Golder's visual observation on December 13, 2022 (refer to Section 3.0).

3.0 VISUAL OBSERVATIONS

3.1 Overview

40 CFR 257.84(b)(1)(ii) requires the annual inspection to include visual observation of the facility that is intended to identify signs of distress or malfunction. 40 CFR 257.84(b)(2)(iii) requires the annual inspection report to include a description of appearances of structural weakness at the facility, in addition to existing conditions that are disrupting or have the potential to disrupt the operation and safety of the facility. These requirements are addressed in this section.

3.2 Visual Observation Terminology

Terms used in this section are defined as follows:

Condition of Facility Component

Good:	A condition that is generally better than the minimum expected condition based on the design criteria and maintenance performed at the facility.
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- Fair: A condition that is generally consistent with the minimum expected condition based on the design criteria and maintenance performed at the facility.
- Poor: A condition that is generally worse than the minimum expected condition based on the design criteria and maintenance performed at the facility.

Severity of Deficiency

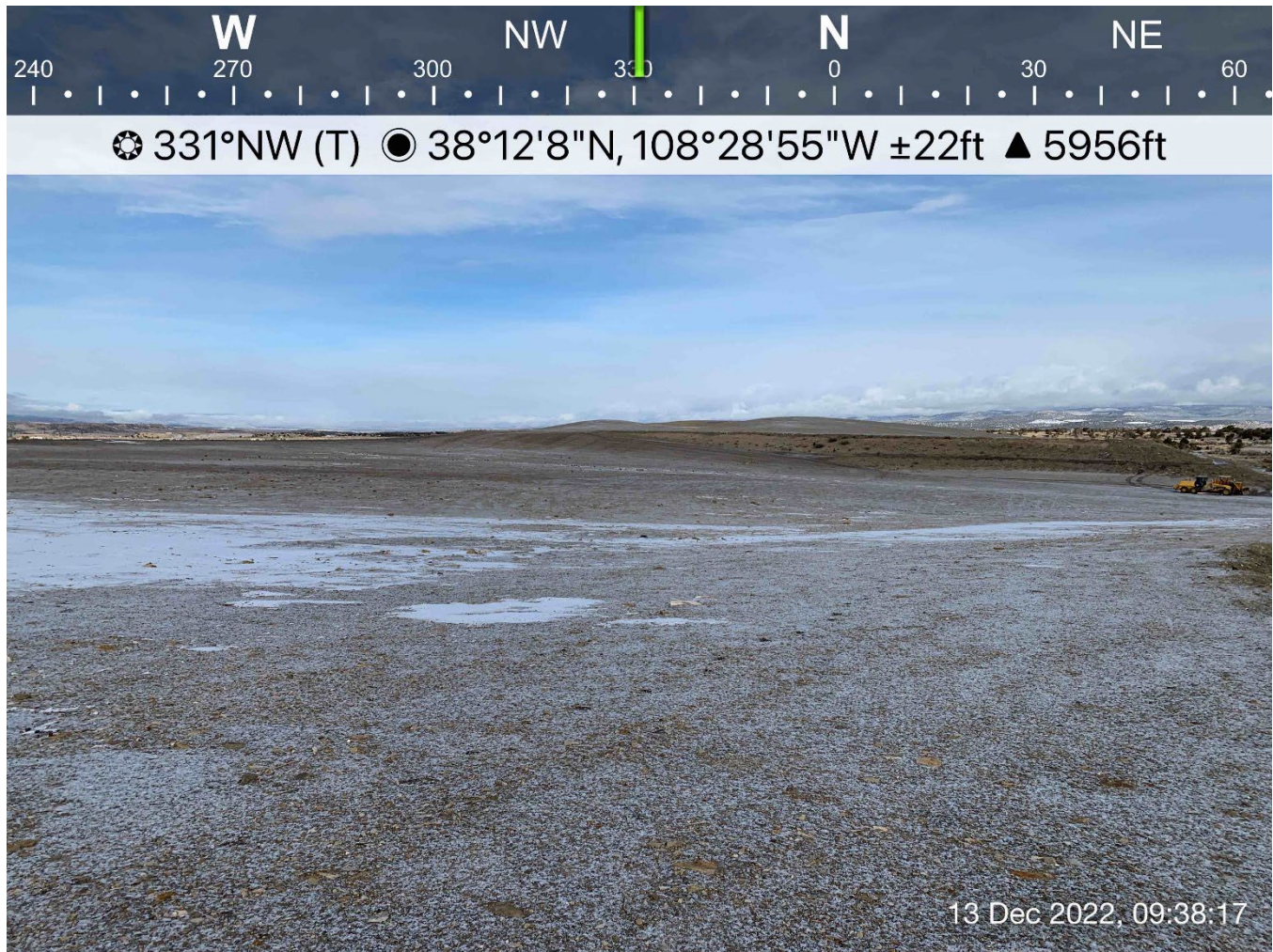
- Minor: An observed deficiency where the current condition is worse than the minimum expected condition but does not currently pose a threat to structural stability.
- Significant: An observed deficiency where the current condition is worse than the minimum expected condition and could pose a threat to structural stability if it is not addressed.
- Excessive: An observed deficiency where the current condition is worse than the minimum expected condition and either hinders the ability of an inspector to evaluate the facility component or poses a threat to structural stability.

3.3 Findings

Golder conducted a visual observation of the facility on December 13, 2022. Golder observed the condition of the top surfaces, embankment slopes, embankment crests, embankment toes, and stormwater control features. The annual inspection form is included in Appendix A. The locations and orientations of photographs presented in this section are shown on the annual inspection form.

3.3.1 Top Surface

The top surface was observed to be in good condition. Signs of ground movement, such as sloughing or sliding, cracking, subsidence, or bulging, were not observed across the top surface. The top surface was appropriately graded so that stormwater will be routed away from the facility to the designated locations. Minor erosion rills were observed at one location, where indicated in Appendix A. The erosion rills do not currently pose a threat to structural stability and did not hinder Golder's ability to inspect the facility. The typical condition of the top surface is depicted in Photograph 1.



Photograph 1: Typical Condition of the Top Surface

3.3.2 Embankment Crests

The embankment crests were observed to be in good condition. Cracking that would be indicative of ground movement was not observed along the embankment crests. Low areas that would be indicative of differential settlement were not observed along the embankment crests. The typical condition of the embankment crests is depicted in Photograph 2.

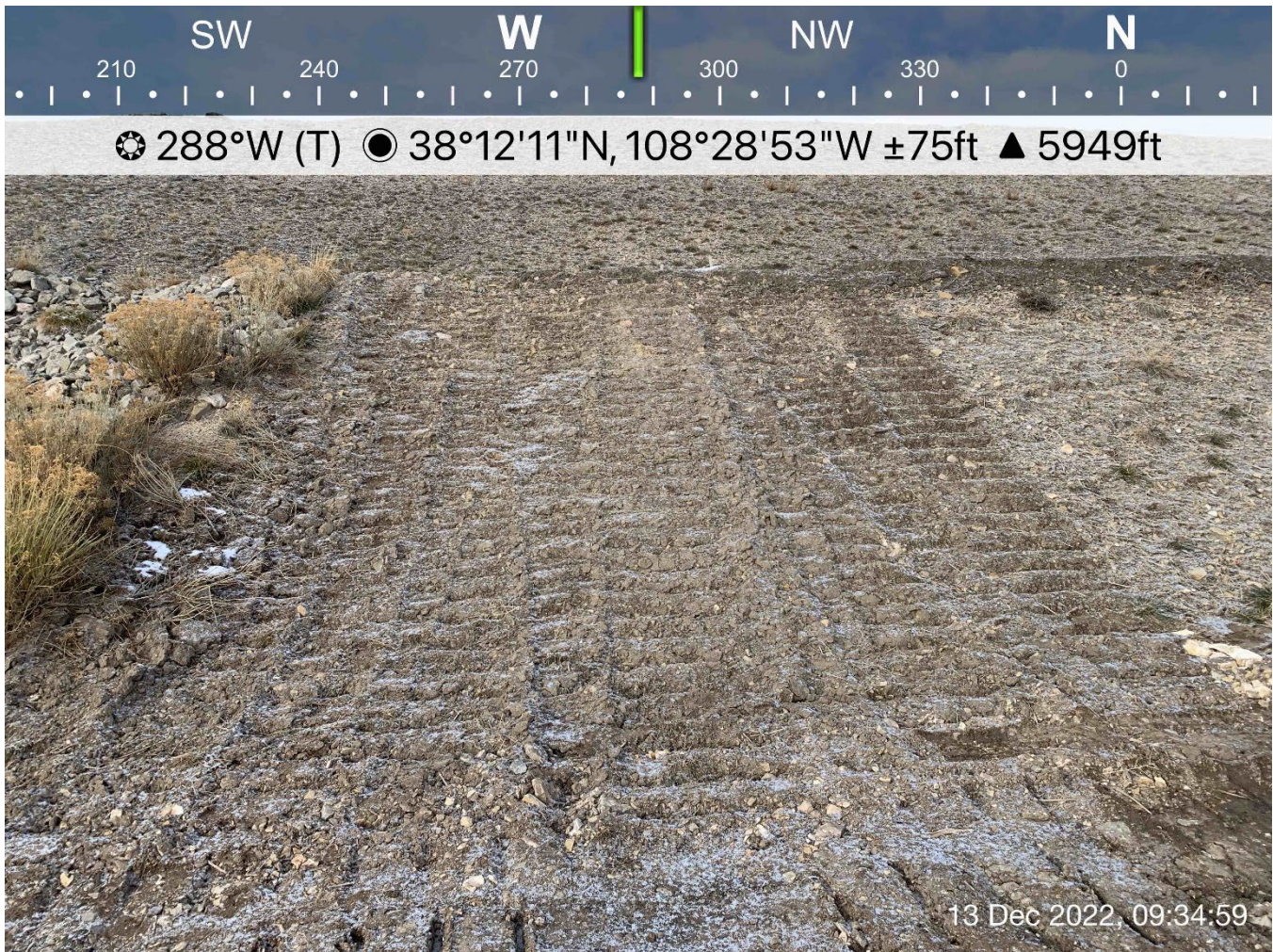


Photograph 2: Typical Condition of Embankment Crests

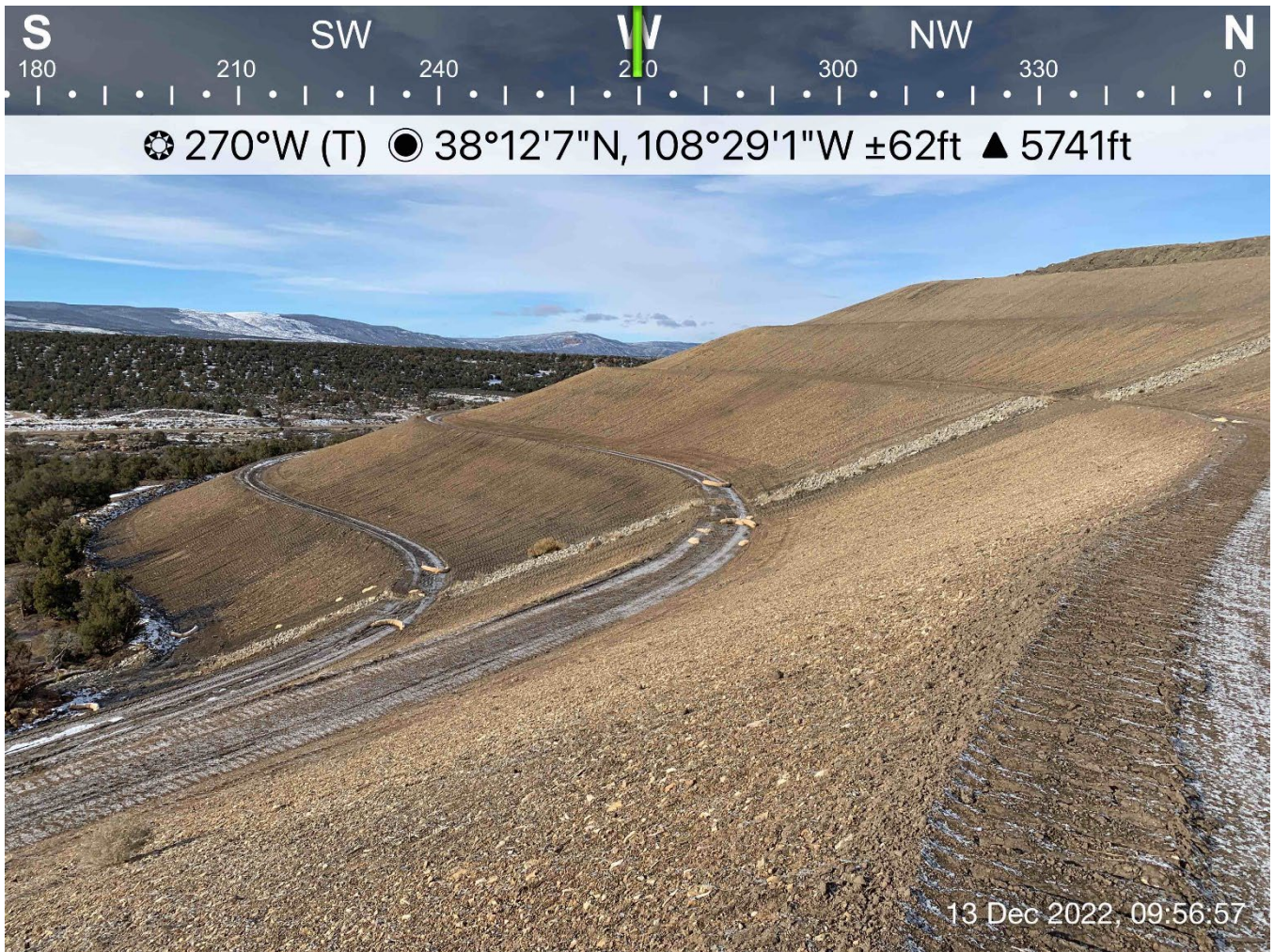
3.3.3 Embankment Slopes

The embankment slopes were observed to be in good condition. Signs of ground movement, such as sloughing or sliding, cracking, subsidence, or bulging, were not observed on the embankment slopes. Evidence of excessive erosion or slope deterioration was not observed on the embankment slopes. At the time of the visual observation, repair work had recently been completed to address erosion rills on the embankment slopes in several locations. A typical erosion rill repair is shown in Photograph 3. The weekly inspection forms indicate that the erosion rills were primarily caused by major storm events in late September and early October 2022. The repair work appeared to be adequate to address the erosion damage. Native vegetation has been established on the embankment slopes. The west, north, and east embankment slopes generally had adequate vegetative coverage at the time of the visual observation. Vegetation on the south embankment slopes has yet to reestablish after major repair work in the fall of 2021. Reseeding should be carried out during the appropriate season in areas where work has been performed to address erosion rills. Unusually poor or thriving vegetative growth was not observed on the embankment slopes. A few animal burrows were observed on the embankment slopes, where indicated in Appendix A. The animal burrows do not currently pose a threat to structural stability and did not

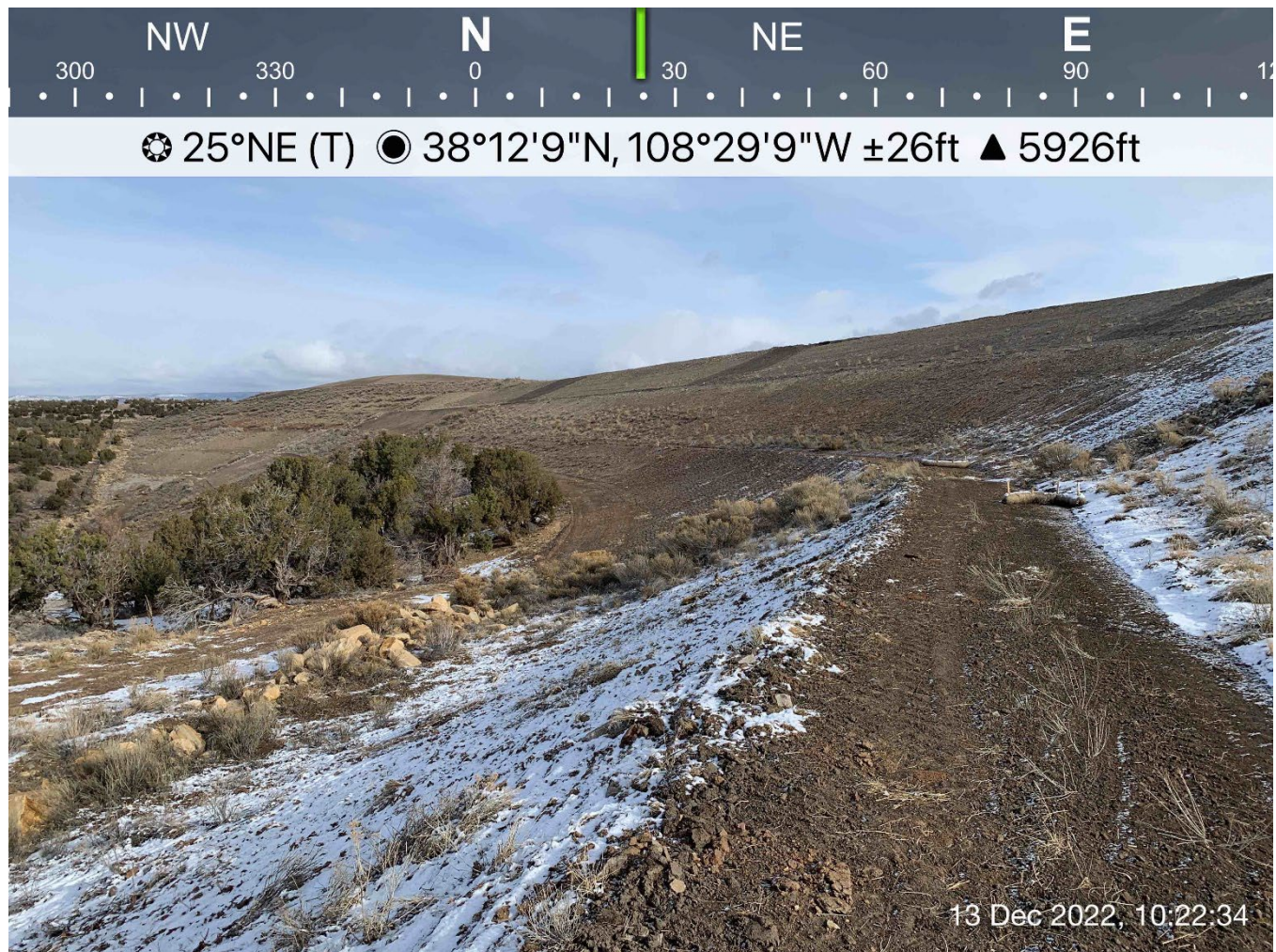
hinder Golder's ability to inspect the facility. The typical condition of the south embankment slopes is depicted in Photograph 4. The typical condition of the west, north, and east embankment slopes is depicted in Photograph 5.



Photograph 3: Typical Condition of Erosion Rill Repair Areas



Photograph 4: Typical Condition of the South Embankment Slopes



Photograph 5: Typical Condition of the West, North, and East Embankment Slopes

3.3.4 Embankment Toes

The embankment toes were observed to be in good condition. Signs of seepage, such as springs or boggy areas, were not observed along the embankment toes. The typical condition of the embankment toes is depicted in Photograph 6.



Photograph 6: Typical Condition of Embankment Toes

3.3.5 Stormwater Control Features

The stormwater control features at the facility were observed to be in good condition. Downchute channels and energy dissipation basins at the facility are constructed with riprap. At the time of the visual observation, repair work had recently been completed to address erosion damage to several of the downchute channels. The weekly inspection forms indicate that the damage was caused by major storm events in late September and early October 2022. The repair work appeared to be adequate to address the damage. The typical condition of the downchute channels is depicted in Photograph 7. Terrace channels at the facility are provided at approximate 20-foot vertical intervals. Erosion control wattles have been installed to control erosion and capture sediment in the terrace channels at appropriate intervals. The typical condition of the terrace channels is depicted in Photograph 8. Perimeter channels are in place around the facility where they are needed to control stormwater. Perimeter channels at the facility are generally constructed with soil and rock. Erosion control wattles have been installed at appropriate intervals in the perimeter channels to control erosion and capture sediment. The typical condition of the perimeter channels is depicted in Photograph 9. During the visual observation, Golder observed the significant damage to a stormwater outfall that was caused by major storm events in late September and early October 2022, where indicated in Appendix A. The damage is shown in Photograph 10. This damage should be

repaired, and Golder is in the process of developing recommendations for repair work to address the damage. The damage does not currently pose a threat to structural stability and did not hinder Golder's ability to inspect the facility.



Photograph 7: Typical Condition of Downchute Channels



Photograph 8: Typical Condition of Terrace Channels



Photograph 9: Typical Condition of Perimeter Channels



Photograph 10: Damage to Stormwater Outfall

4.0 CONCLUSIONS AND RECOMMENDATIONS

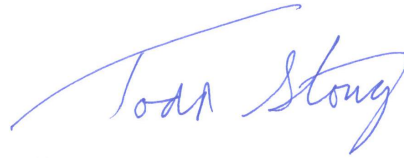
Golder completed an annual inspection of the Nucla Station Ash Disposal Facility to address the requirements of 40 CFR 257.84. The facility is in good condition overall. Signs of distress or malfunction of the facility were not observed, and appearances of actual or potential structural weakness of the facility were not identified. Current facility maintenance practices such as control of burrowing animals, monitoring and maintenance of embankment slopes, establishment of suitable vegetation on embankment slopes, and use of appropriate erosion control measures should continue, with repairs or improvements made as the need is indicated by weekly inspections conducted in accordance with 40 CFR 257.84(a).

Signature Page

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JEO/TJS/df

[https://golderassociates.sharepoint.com/sites/162862/project files/6 deliverables/01_prt_annual report/rev0/31403149.000-01-r-0_nucla_annual_insp_2022_16dec22.docx](https://golderassociates.sharepoint.com/sites/162862/project%20files/6%20deliverables/01_prt_annual%20report/rev0/31403149.000-01-r-0_nucla_annual_insp_2022_16dec22.docx)

5.0 REFERENCES

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- Golder. 2021a. Coal Combustion Residuals Landfill Annual Inspection, Nucla Station Ash Disposal Facility. Report prepared for Tri-State Generation and Transmission Association, Inc. December 17.
- Golder. 2021b. Run-On and Runoff Control System Plan, Nucla Station Ash Disposal Facility. Plan prepared for Tri-State Generation and Transmission Association, Inc. October 15.
- Golder. 2022a. Closure Plan, Nucla Station Ash Disposal Facility. Report prepared for Tri-State Generation and Transmission Association, Inc. February 23.
- Golder. 2022b. Closure Certification, Nucla Station Ash Disposal Facility. Report prepared for Tri-State Generation and Transmission Association, Inc. June 20.
- Tri-State Generation and Transmission Association, Inc. (Tri-State). 2022a. Notification of Intent to Close CCR Unit, Nucla Station Ash Disposal Facility. January 28.
- Tri-State. 2022b. Notification of Final Cover Completion, Nucla Station Ash Disposal Facility. June 22.

Tri-State. 2022c. Notification of Recording of Notice of Obligation in Lieu of CCR Deed Notation, Nucla Station Ash Disposal Facility. June 22.

Western Colorado Testing, Inc., and J.F.T. Agapito & Associates, Inc. 1987. Geological and Geohydrological Evaluation of Dry Storage Site, Nucla CFB Demonstration Project. Report prepared on behalf of Colorado-Ute Electric Association, Inc., for the Colorado Department of Health. July 8

APPENDIX A

Annual Inspection Form



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION
NUCLA STATION ASH DISPOSAL FACILITY
ANNUAL INSPECTION FORM

Inspection Date: December 13, 2022	Inspection Time: 9:00 to 11:30 am	Legend: Y Yes N No NI Not inspected NA Not applicable RA Requires action
Inspector(s): Jason Obermeyer, PE	Title(s): Practice Leader	
Reviewer: Todd Stong, PE	Title: Practice Leader	

Instructions: Complete each part of the annual inspection form. Indicate areas of concern on the plan view on page 3. Elaborate on deficiencies in Section J.

A. Previous Open Items

1. List open items from the previous year's annual inspection form (Section I.) and indicate whether or not the open items have been addressed:

a. Sediment buildup at downstream ends of culverts under site entrance road	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
b.	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
c.	Y	N	NI	NA	RA	If N and/or RA, please elaborate.

B. Atmospheric Conditions

1. Briefly describe precipitation conditions (rainy, dry, snowy) or notable precipitation events over the last five days: Light snow on December 12, 2022

2. Briefly describe wind (calm, breezy, windy, gusty) and weather (cold, warm, cloudy, sunny) conditions during the inspection: Calm, cold, partly cloudy

C. Facility Access

1. Are facility access roads in good condition?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
2. Are facility access controls (signage, fencing, gates) in good condition?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
3. Do you observe signs of unauthorized access or disposal?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.

D. Top Surface

1. Do you observe signs of ground movement on the top surface? Y N NI NA RA If Y and/or RA, please elaborate.

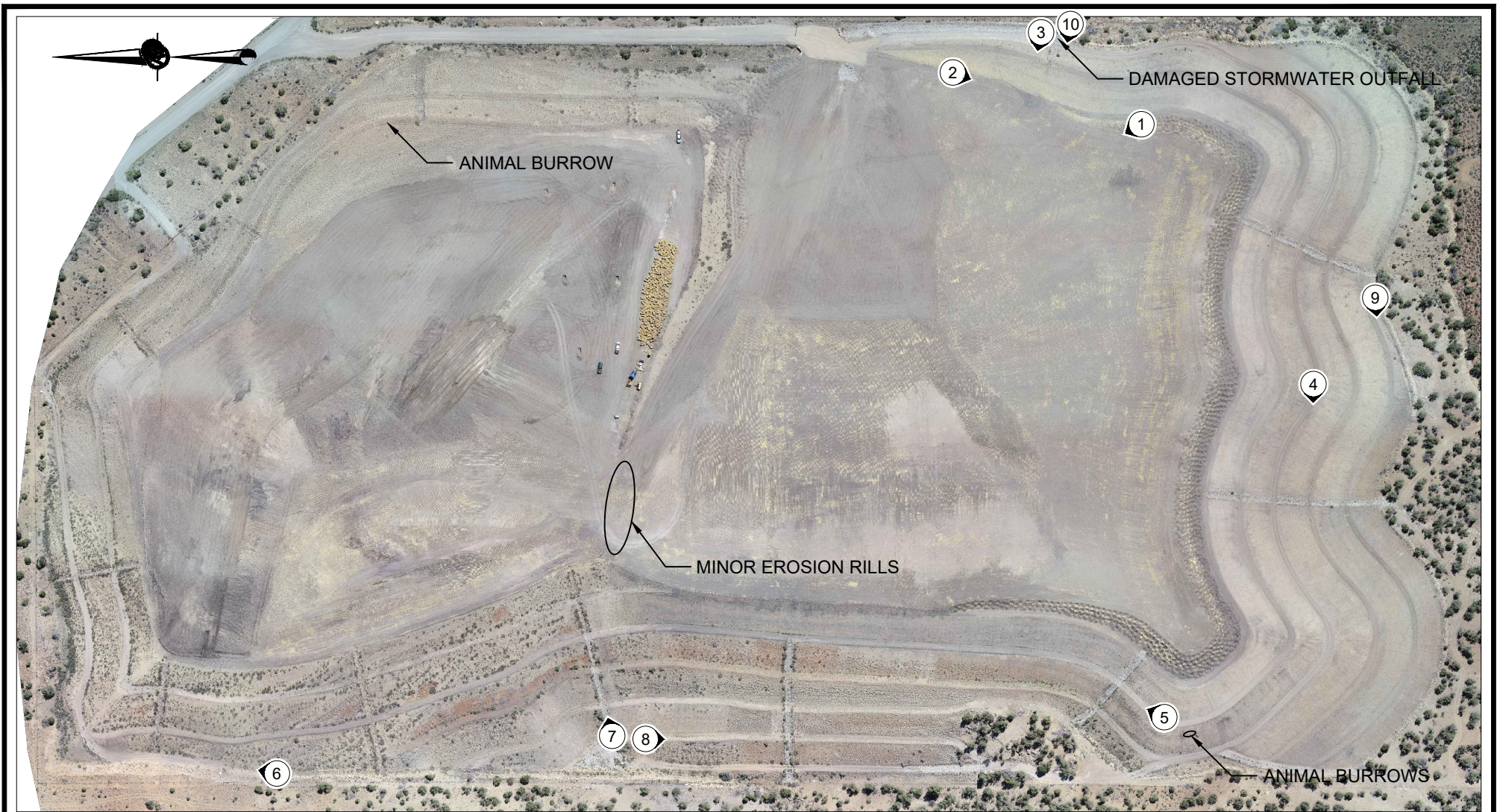
If Y, circle those that apply: Slough or Slide Cracking Subsidence Bulging

2. Do you observe ponding on the top surface?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
3. Do you observe signs of excessive erosion on the top surface?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
4. Do you observe inadequate, unwanted, or unusual (thriving or poor) vegetative growth?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
5. Do you observe animal burrows on the top surface?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.

E. Embankment Crests

1. Do you observe cracks along the embankment crest?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
2. Do you observe differential settlement (low areas) along the embankment crest?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.

F. Embankment Slopes						
1. Briefly describe ground conditions (wet, dry, soft, firm). North: Firm, snowy East: Soft, moist to wet South: Soft to firm, dry West: Soft to firm, dry to moist						
2. Do you observe signs of movement or instability on the embankment slopes? If Y, circle those that apply: Slough or Slide Cracking Subsidence Bulging	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
3. Do you observe signs of excessive erosion or slope deterioration?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
4. Do you observe inadequate, unwanted, or unusual (thriving or poor) vegetative growth?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
5. Do you observe animal burrows on the embankment slopes?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
G. Embankment Toes						
1. Do you observe signs of seepage (springs or boggy areas) at the embankment toe?	Y	N	NI	NA	RA	If Y and/or RA, please elaborate.
H. Stormwater Control Features						
1. Are rundowns (downchute channels) and energy dissipation features in good condition?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
2. Are terrace channels in good condition and providing positive drainage toward rundowns?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
3. Are culverts (including inlet and outlet areas) in good condition?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
4. Are perimeter channels and stormwater outfalls in good condition?	Y	N	NI	NA	RA	If N and/or RA, please elaborate.
I. Open Items						
1. List unresolved items from previous annual inspections (RA in Section A.) and new items identified during the annual inspection (RA in Sections B. through H.):						
a. H.4. Repairs are needed at the stormwater outfall on the southern half of the east perimeter due to erosion damage from a major storm event.						
b.						
c.						
d.						
e.						
J. Elaboration						
Identify the specific item number (for instance, F.2.) and elaborate on each deficiency or issue identified during the annual inspection. Attach documentation (photographs or sketches) if practical.						
D.3. Minor erosion rills were observed along the west edge of the top surface, near the crest of the top surface access road (see the map on page 3). Tri-State personnel indicated that erosion rills have been recurring in this location. Tri-State has requested that Golder provide recommendations on armoring in this location.						
D.5. Small animal burrows were observed in one location near the southwest corner of the facility and in another location along the east edge of the facility (see the map on page 3). Tri-State should monitor these areas for continued burrowing activity.						
H.4. Perimeter channels and stormwater outfalls are in good condition, with one exception. The stormwater outfall on the southern half of the east perimeter (see the map on page 3) was damaged by major storm events in late September and early October, according to Tri-State personnel. Repairs should be made. Tri-State has requested that Golder provide recommendations on how to conduct the repair work.						



AERIAL IMAGE: EPP & ASSOCIATES, MAY 13, 2022.



② PHOTOGRAPH LOCATION AND DIRECTION

ANNUAL INSPECTION FORM

TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION

NUCLA STATION ASH DISPOSAL FACILITY

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