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# Annual CCR Unit Inspection Report

Lon D. Wright Power Plant  
Fremont, Nebraska

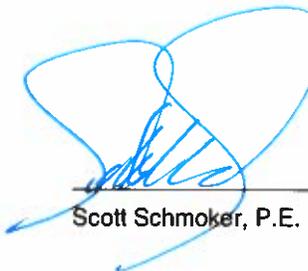
Prepared for  
**Fremont Department of Utilities**

400 E. Military Road  
Fremont, NE 68025

February 28, 2018



TETRA TECH, INC.  
6307 Center Street, Suite 210  
Omaha, Nebraska

  
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Scott Schmoker, P.E.      3/1/2018      Date



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# Executive Summary

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On December 18, 2017, Tetra Tech completed an annual coal combustion residue Unit (CCR Unit) inspection by a qualified professional engineer (P.E.) for the City of Fremont Department of Utilities (FDU) Lon D. Wright Power Plant (LDW). The primary purpose of the inspection was to assess that the CCR Unit is designed, constructed, operated, and maintained consistent with recognized and generally accepted good engineering standards and protection of human health and the environment. The inspection included review of Fremont's current Fossil Fuel Combustion Ash Monofill Permit (Permit Number NE0203777), CCR Unit maintenance and compliance evaluation forms, and observation of the CCR Unit and associated activities.

Recommendations developed through the inspection process are listed below:

*Although rodent burrows observed during the inspection were perceived to be shallow and not indicative of threat to human health or the environment, FDU should continue to be diligent about eradicating pests that have the potential to cause damage to the berms and/or the leachate collection system. Observation of CCR Unit operations, design, geometry, ash volume, and maintenance appear to meet the requirements and no adverse conditions were noted. No structural weaknesses or any other conditions were observed that would disrupt operation and safety.*

# Section 1: Introduction

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## 1.1 Facility Information

<b>Facility Name:</b>	<b>Lon D. Wright Power Plant (LDWPP)</b>
<b>Facility Street Address:</b>	2701 E. First St. Fremont, NE 68025
<b>Owner Name:</b>	<b>Fremont Department of Utilities (FDU)</b>
<b>Owner Address:</b>	400 E. Military Avenue Fremont, NE 68025

## 1.2 CCR Unit Information

The Lon D. Wright Power Plant operates an ash monofill (CCR Landfill Unit) for staging and disposal of ash (CCR) resulting from coal combustion related to on-site power generating activities. The design of the CCR Unit incorporates a composite liner, leachate collection system, final cover, and a surface water control system. The liner system includes a 2-foot-thick clay liner compacted to maximum permeability of  $1 \times 10^{-7}$  cm/sec and a 60-mil high density polyethylene (HDPE) liner. The leachate collection system includes a minimum 12-inch granular drainage layer spread over the top of the liner. The drainage layer allows leachate to gravity drain along the bottom of the Monofill to perforated 6-inch-diameter PVC piping embedded in the drainage layer. Geotextile fabric was spread over the entire drainage layer, and a 6-inch protective soil cover was placed over the geotextile fabric. The leachate collection piping discharges leachate into a sump area where the leachate is pumped to the leachate retention pond. Berms, approximately 7-foot high, protect the CCR Unit from storm water run-on and prevent storm water run-off from the active portions of the CCR Unit.

## 1.3 Purpose

This report has been prepared to document the inspection of the FDU CCR Unit. The inspection was conducted by Tetra Tech on December 18, 2017 and meets the compliance requirements for annual CCR inspections found under 40 CFR 257.84. This report includes inspection checklists, observations, findings and recommendations, and a photographic log of the inspection. No testing or sampling was conducted during the inspection.

## **Section 2: Annual CCR Unit Inspection**

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### **2.1 Objectives**

This inspection was conducted to fulfill the requirement for a CCR Unit landfill found at 40 CFR 257.84 to conduct an inspection by a qualified professional engineer at intervals not exceeding 1 year. The initial inspection was conducted on January 5, 2016, and the first annual inspection was conducted on January 4, 2017. This annual CCR Unit inspection was conducted to ensure that the design, construction, operation, and maintenance of the CCR Unit is consistent with recognized and generally accepted good engineering standards and protective of human health and the environment. This report describes the results of the December 18, 2017 annual CCR Unit inspection conducted at LDW.

### **2.2 CCR Unit Inspection Method**

Tetra Tech completed an initial inspection (baseline) on January 5, 2016 following the Fremont Department of Utilities Annual CCR Unit Inspection Protocol (December 2015). All subsequent annual inspections will continue to follow the approved inspection protocol. This inspection was conducted by Tetra Tech's Scott Schmoker, P.E., and David Hermance, Environmental Scientist IV. Tony Sedlacek, chemistry supervisor and environmental coordinator for FDU, escorted Scott Schmoker and David Hermance for the duration of the inspection. Tony Sedlacek provides environmental oversight of the CCR Unit. Records and copies of requested records were provided by Tony Sedlacek. Weather conditions were sunny, clear, and temperature approximately 45 degrees Fahrenheit. Conditions were generally dry with a southwest wind at approximately 11 miles per hour.

### **2.3 Review of Operations and Maintenance Data**

CCR Unit compliance, operations, and maintenance records were reviewed to assess operating conditions, issues, and maintenance activities occurring during the previous 1-year period. The following records (dated) and permits were reviewed:

- 1) Work Order History Reports specific to CCR Unit operations from January 6, 2017 to December 18, 2017.
- 2) Weekly CCR Unit Compliance Evaluation Forms beginning January 9, 2017 through December 18, 2017.
- 3) FDU Ash Monofill Leachate System Pumps Monthly Operational Inspection Log Sheet January 2017 through December 2017.
- 4) FDU letter dated January 31, 2017, to NDEQ with notification of planned corrective action for plugged leachate collection piping.
- 5) FDU letter dated May 24, 2017, to NDEQ with notification of completed planned corrective action for plugged leachate collection piping.

- 6) FDU letter dated August 16, 2017, to NDEQ with notification of tree removal on the adjacent property north of the CCR Unit for the purpose of solar farm construction.

## **2.4 Visual Inspection**

A visual inspection was conducted of the CCR Unit including the lined disposal area, leachate collection pond and visible portion of the system, pump house, Phase I berms, run-on and run-off system, and ground water monitoring system and well locations.

### **2.4.1 CCR Unit Lined Disposal Area**

The CCR Unit was observed for placement of CCR on the lined area, signs of water accumulation on the liner (ponding), fugitive dust, run-on and run-off control measures, and overall condition of the CCR Unit and associated operations (see Appendix B, Photographs #1 – #3).

A visual inspection of the lined disposal area was conducted by walking the perimeter of the CCR Unit. The extent of the liner was identified by the designed proximity to the Phase I berms. No issues were observed and the CCR appeared to be well within the confines of the lined area and no changes were noted in the geometry of the permitted design of the Unit. According to Tony Sedlacek, review of facility records indicates that the CCR Unit contained approximately 4,500 tons of CCR at the time of the inspection. A visual comparison between the amount of CCR in the CCR Unit during the January 4, 2017 and December 18, 2017 inspections appears to indicate a similar amount of CCR. Due to beneficial uses of CCR, very little net loss of available capacity was experienced by the CCR Unit.

Condition and adequacy of the engineered storm water run-on and run-off structures associated with the CCR Unit were evaluated. There was no indication that storm water run-on and run-off measures were failing or inadequate. No sign of erosion, ponding off the lined area, accumulation of CCR off the lined area, washouts, or any abnormal conditions were observed.

*Recommendations: FDU should continue to be diligent in meeting the CCR Unit operation requirements. Observation of CCR Unit operations, design, geometry, ash volume, and maintenance appear to meet the requirements and no adverse conditions were noted. No structural weaknesses or any other conditions were observed that would disrupt operation and safety.*

### **2.4.2 Leachate Collection System**

Observation of the leachate collection system was conducted by walking the perimeter of the lined leachate collection pond (see Appendix B, Photographs #4 – #7), entering the pump house (building located between the disposal area and leachate collection pond that protects the leachate pumps and associated pipes and valves), and the leachate collection pipes that rise from the bottom of the CCR Unit disposal area liner and extend above the berm and are nested in a concrete weir. A high level alarm is in place to notify FDU staff when leachate needs to be pumped to the leachate collection pond. Tony Sedlacek explained that FDU staff maintain the system to ensure the amount of leachate on the disposal unit liner does not exceed twelve inches above the liner. The depth of the leachate was not measured but there was sufficient capacity remaining between the pond level and the top of the liner.

Evidence of rodent activity was observed near the pump house. Shallow rodent burrow holes were observed, but had not caused damaged or otherwise affected the leachate pond liner. Rodent bait traps were strategically placed in this area. Tony Sedlacek explained that the bait traps were routinely managed and that no damage to the liner or other leachate collection system equipment was observed during the annual period.

The pump house is located between the leachate collection pond and the CCR Unit. It provides protection for the pumps, piping and valves. This system is designed to allow for managing leachate as required under certain operating conditions. The pump house floor was dry and no issues were identified with any of the system components. Tony Sedlacek provided the FDU Ash Monofill Leachate System Pumps Monthly Operational Inspection Log Sheet that is kept in the pump house and completed after each monthly inspection. No issues were identified in the monthly log.

A visual inspection of the leachate piping risers, concrete weir, and high level alarm was conducted. The risers provide access to the lateral collection pipes installed along the bottom of the disposal area but above the liner. According to Tony Sedlacek, the annual camera inspection of the collection pipes occurs at this access port. A camera inspection of the leachate collection system was last conducted September 15, 2017. During the December 18, 2017 annual inspection, no issues were identified and the exposed collection pipe risers, concrete weir and high level alarm appeared to be in good operating condition.

*Recommendations: FDU should continue to be diligent about eradicating pests that have the potential to cause damage to the leachate collection system. No conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the leachate collection system. Additionally, FDU should continue to be diligent in meeting the leachate system requirements including conducting camera inspections of the leachate system piping.*

### **2.4.3 Phase I Berms and Phase II Area**

Condition of the Phase I berms and Phase II area were evaluated for erosion, vegetative cover, signs of structural failure, animal burrows, and any abnormalities (see Appendix B, Photographs #1, #2, #3, and #12). Evidence of rodent activity was observed on the outer slope of the east side of the leachate pond berm. The rodent burrow appeared to be shallow and not indicative of structural problem for the berm at the time of the inspection. Rodent bait traps were strategically placed in this area. Tony Sedlacek explained that the bait traps were routinely managed and that shallow burrows, when observed, are destroyed by collapsing the entrance. Tetra Tech did not observe any abnormal conditions or issues that warrant additional corrective action. The slope and condition of the berms were observed by Tetra Tech to be in good condition and had no obvious indications of erosion or lack of vegetation.

*Recommendations: FDU should continue to be diligent in meeting the requirements for proper berm management. FDU should continue to be diligent about eradicating pests that have the potential to undermine the integrity of the berms. No conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the Phase I berms and Phase II area.*

## 2.4.4 Ground Water Monitoring Wells

Eight ground water monitoring wells encompass the CCR Unit including the disposal area and leachate collection pond. This system is designed to provide access to ground water for the purpose of monitoring and testing certain parameters and constituents used to detect release of CCR material to the environment. Location of the eight ground water monitoring wells are shown in Figure 1 (see Appendix B, Photographs #8 – #11).

No issues were noted during the December 18, 2017 inspection. Monitoring well risers and concrete pads were in good condition and all riser caps were locked.

*Recommendations: FDU should continue to be diligent in meeting the ground water requirements associated with the CCR Unit. No conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the groundwater monitoring system.*

## 3. Summary

On December 18, 2017, Tetra Tech conducted FDU's CCR Unit inspection, which is required to be conducted annually by a qualified professional engineer. Based on observations, it is the opinion of Tetra Tech that FDU has designed, constructed, operated, and maintained the CCR Unit with recognized and generally accepted good engineering standards that are protective of human health and the environment. FDU should consider and implement the recommendations provided in this report to ensure meeting the conditions of both state (permit) and federal CCR Landfill Unit requirements.



**Figure 1**

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APPENDIX A

# **Annual CCR Unit Inspection Checklist**

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December 18, 2017  
 Scott Schmoker, P.E.  
 David Hermance

## Annual CCR Unit Inspection Checklist

Lon D. Wright Power Plant

Circle either "YES" or "NO" to each question in the tables below:

### OUTSIDE PERIMETER:

1. Is visible evidence of CCR (i.e., ash) present around the outside perimeter of the CCR Unit?	YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
2. Is visible evidence of storm water runoff issues such as pooling or significant erosion present outside the perimeter of the CCR Unit?	YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
<p>Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:</p> <p style="font-size: 1.2em;">Not Applicable</p>		
<p>Photograph Numbers: <u>#s 1, 2, 3</u></p>		

### BERM:

1. Is visible evidence of CCR (i.e., ash) present on the crest and outside slope of the CCR Unit berm?	YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
2. Is visible evidence of burrowing animals present on the slopes or crest of the berm?	<input checked="" type="radio"/> YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
3. Is visible evidence of erosion, cracks, or irregularities present on the berm?	YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
4. Is the vegetative cover on the berm sufficient to prevent erosion?	<input checked="" type="radio"/> YES	<input type="radio"/> YES <input checked="" type="radio"/> NO
<p>Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:</p> <p style="font-size: 1.2em;">Shallow animal burrows on east side (outer slope) of berm for leachate pond area. Rodent baits currently in place (traps). Shallow burrow holes are collapsed when observed by plant personnel.</p> <p style="font-size: 1.2em;">- Continue bait traps and monitoring.</p> <p style="font-size: 1.2em;">Shallow animal burrows also observed near pump house. Bait traps in place. Continue bait traps and monitoring</p>		
<p>Photograph Numbers: <u>#s 1, 3, 6</u></p>		

**LINED AREA:**

1. Is visible evidence of improper placement of CCR (i.e., ash) present?	YES	<input type="radio"/> NO
2. Is visible evidence of burrowing animals present in the lined area?	YES	<input type="radio"/> NO
3. Is visible evidence of liquid accumulation in the lined area present within the lined area?	YES	<input type="radio"/> NO
4. Is visible evidence of liner failure or compromise present?	YES	<input type="radio"/> NO
Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:		
Photograph Numbers: #s 1, 2, 3		

**LEACHATE SYSTEM:**

1. Is visible evidence of leaks from the piping, valves, or pumps present?	YES	<input type="radio"/> NO
2. Is visible evidence of excessive corrosion on metal parts of the system?	YES	<input type="radio"/> NO
3. Is the leachate in the leachate pond cloudy or muddy?	YES	<input type="radio"/> NO
Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:		
Photograph Numbers: #s 4, 5, 6, 7		

APPENDIX B

# Photographs

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18-Dec-17  
Photograph #1

Photograph of CCR Unit Phase 1 facing northeast on access road between CCR Unit disposal area and leachate pond.

Piles of CCR are staged for off-site shipment for beneficial use.



18-Dec-17  
Photograph #2

Photograph of CCR Unit Phase 1 facing northwest on access road between CCR Unit disposal area and leachate pond.

View of bottom ash pile.



18-Dec-17  
Photograph #3

Photograph of CCR Unit Phase 1 facing east, southeast from southwest corner of berm.

View of bottom ash with fly ash in background.



18-Dec-17  
Photograph #4

Photograph of east end of  
leachate pond and liner.



18-Dec-17  
Photograph #5

Photograph of west end of  
leachate pond and liner.



18-Dec-17  
Photograph #6  
Photograph of shallow  
rodent burrows above the  
liner near the pump house.



18-Dec-17  
Photograph #7

Photograph of the north side of the leachate pond and liner with the pump house in background (center),



18-Dec-17  
Photograph #8

Photograph of Monitoring Well #1 ("MW-1") located east of the CCR Unit.



18-Dec-17  
Photograph #9

Photograph of Monitoring Well #8 ("MW-8") located south of the leachate pond.



18-Dec-17  
Photograph #10

Photograph of Monitoring Well #3 ("MW-3") located southwest of the leachate pond.



18-Dec-17  
Photograph #11

Photograph of Monitoring Well #5 ("MW-5") located north of the CCR Unit disposal area.



18-Dec-17  
Photograph #12  
Photograph of the undeveloped Phase 2 area identified for future use.

APPENDIX C

# Work Order History Report

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## Work Order History Report

Dates: From 1/05/2017 To 12/18/2017. Equipment: From MONOFILL To MONOFILL.

Query: None

EQUIPMENT:MONOFILL		MONOFILL							
WO	TASK	SCHEDULED	DONE		ACT	EST	BREAK	EMP	TYPE
5,561	1	1/18/17	1/09/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
5,635	1	2/06/17	2/02/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	FH	PM
				TROY TAYLOR DID INSPECTION - NOTHING ABNORMAL FOUND					
5,708	1	3/22/17	3/15/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
				INSPECT MONOFILL - NO ABNORMAL FINDINGS					
5,960	1	4/14/17	4/14/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
				NO PROBLEMS FOUND					
6,017	1	5/15/17	5/18/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
				INSPECTED AND FOUND NO PROBLEMS					
6,030	9999		5/22/17	PUMP LEACHATE FROM LEACHATE RETENTION TO JOCKEY WATER SYSTEM.	0.00	0.00	0.00	TV	UN
6,031	9999		5/23/17	PUMP LEACHATE FROM LEACHATE RETENTION TO JOCKEY WATER SYSTEM.	0.00	0.00	0.00	TV	UN
6,032	9999		5/24/17	PUMP LEACHATE FROM LEACHATE RETENTION TO JOCKEY WATER SYSTEM.	0.00	0.00	0.00	TV	UN
6,259	1	7/27/17	7/03/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
				NO ABNORMAL RESULTS					
6,352	1	8/14/17	8/21/17	INSPECT LECHATE PUMPS MONTHLY	0.30	1.00	0.00	DH	PM
6,418	1	9/20/17	9/26/17	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TV	PM
				INSPECTED MONOFILL PUMPS ALL GOOD					
Equipment Total:					7.30	8.00	0.00		
Grand Total:					7.30	8.00	0.00		

# Work Requests/Work Orders

Shift Log: LDW Shift Reporting  
Report Generated: Monday, Dec 18, 2017 at 08:30

## Operating Note

**Date/Time** 08/08/2017 08:03

**Description / Discussion** Ash Monofill leachate collection pipes due to jetting and camera inspection per the requirement in the Ash Monofill Permit. The camera inspection will meet the permit requirements for the annual inspection for 2017 and the jetting will be completed as preventative maintenance to clean out and/or keep the slotted pipe clear. Sedlacek

**Priority** Normal

**CMMS ID**

**Category**

**Status** Closed

**Date Closed** 10/04/2017 15:17

**Resolution & Closeout** The leachate pipes were jetted out by Dan Roberts and Tony Sedlacek of the Fremont Department of Utilities on August 11, 2017. Each pipe was jetted out twice, but the west pipe was jetted three times due to visible solids being flushed out. The camera inspection will be completed once the water in the pipes has been pumped out to allow for the camera inspection to be completed. The camera inspection was completed on Friday, September 15, 2017 by the Fremont Department of Utilities Water Department personnel Dan Roberts. Water was encountered at approximately 36 feet in each of the 6-inch pipes and the camera trolley was unable to make the bend to completely inspect these pipes. Some ash/sandy gravel was encountered in the west 6-inch pipe. The large 18-inch pipe was successfully inspected with the camera. There was still approximately 6 inches of water remaining in the large pipe. The large pipe looked cleaner than the last inspection with more slots open. Evidence that more slots are being cleaned (opened) by the jetting is the leachate collection system is more efficiently removing water after storm events. Once the storm water infiltrates, the leachate transfer pump is running nonstop which is a sign the water collecting in the pipes as designed. The pipes will continue to be jetted prior to annual inspection.

**Editors** Originator: SEDLACEKT, Last Editor: BOOTHES

APPENDIX D

**Monofill Storm Water Pollution Prevention Plan**  
**Maintenance and Repair of Control Measures**

No Storm Water Pollution Prevention Plan Maintenance and Repairs of Control Measures were required from January 6, 2017 to December 18, 2017.

APPENDIX E

# Weekly CCR Unit Compliance Evaluation Forms

Weekly CCR Unit Compliance Evaluation Forms are maintained in the CCR Operating Record located at the Lon D. Wright Power Plant.

APPENDIX F

# **Leachate System Pumps Monthly Operational Inspection Sheets**

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**FDU ASH MONOFILL  
LEACHATE SYSTEM PUMPS  
MONTHLY OPERATIONAL INSPECTION LOG SHEET**

Pump Type	Pump Operational	Leachate Pump Hours	Leachate Sump Level (feet)	Leachate Retention Pond Surface Water Level (Elevation) (Feet)	Date	Inspector Name
Leachate Transfer Pump	Y / N				1-19-17	TT
Hydrovactor Pump	Y / N				1-19-17	TT
Leachate Sump Pump	Y / N	26598	1.06	2'5"	1-19-17	PT
Leachate Transfer Pump	Y / N				2-7-17	TT
Hydrovactor Pump	Y / N				2-7-17	TT
Leachate Sump Pump	Y / N	26620	1.52	2'5"	2-7-17	TT
Leachate Transfer Pump	Y / N				3-14-17	TT
Hydrovactor Pump	Y / N				3-14-17	TT
Leachate Sump Pump	Y / N	26711	.79	2'8"	3-14-17	TT
Leachate Transfer Pump	Y / N				4-10-17	TT
Hydrovactor Pump	Y / N				4-10-17	TT
Leachate Sump Pump	Y / N	26746	1.45	2'6"	4-10-17	TT
Leachate Transfer Pump	Y / N				5-9-17	TT
Hydrovactor Pump	Y / N				5-9-17	TT
Leachate Sump Pump	Y / N	26792	1.46	2'10"	5-9-17	TT
Leachate Transfer Pump	Y / N				6-21-17	TT
Hydrovactor Pump	Y / N				6-21-17	TT
Leachate Sump Pump	Y / N	27156	1.50	2'9"	6-21-17	TT
Leachate Transfer Pump	Y / N				7-3-17	TT
Hydrovactor Pump	Y / N				7-3-17	TT
Leachate Sump Pump	Y / N	27161	1.46	2'8"	7-3-17	TT
Leachate Transfer Pump	Y / N				8-21-17	DH
Hydrovactor Pump	Y / N				8-21-17	DH
Leachate Sump Pump	Y / N	27277.9	1.46	3'0"	8-21-17	DH
Leachate Transfer Pump	Y / N				9-25-17	TV
Hydrovactor Pump	Y / N				9-25-17	TV
Leachate Sump Pump	Y / N	27573.8	.915	3'6"	9-25-17	TV
Leachate Transfer Pump	Y / N				10-5-17	TT
Hydrovactor Pump	Y / N				10-5-17	TT
Leachate Sump Pump	Y / N	27586	.56	3'5"	10-5-17	TT



