



STATE OF DELAWARE

**DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL**

DIVISION OF WASTE AND HAZARDOUS SUBSTANCES

391 LUKENS DRIVE

NEW CASTLE, DELAWARE 19720

PHONE: (302) 395-2600

**REMEDIATION SECTION**

**RCRA CORRECTIVE ACTION  
LONG-TERM STEWARDSHIP INSPECTION**

**FACILITY:** INV Performance Materials, LLC (Invista)  
25876 DuPont Road  
Seaford, Delaware 19973

**EPA ID:** DED002348845

**DATE OF INSPECTION:** October 10, 2023

**DATE OF REPORT:** November 30, 2023

**DNREC REPRESENTATIVES:** Jeff Martin, Hydrologist II, CAPS

JRM  
11/30/2023

**EPA REPRESENTATIVES:** Not Present

**FACILITY REPRESENTATIVES:** Kevin Mastaw, P.E., Environmental Engineer, Invista

**REPORT SUBMITTED TO:** Qazi Salahuddin, Ph.D., Program Administrator, RS

**VIA:** Ross Elliot, P.G., Acting Program Manager II, RS

*over 6000 12/15/23*

**REFERENCE:** INV Performance Materials, LLC. File Code: 70  
2023 1130 70 GEN INV LTS Report DED002348845

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A representative of Delaware’s Department of Natural Resources and Environmental Control (DNREC), Division of Waste and Hazardous Substances (WHS) and a representative of the property owner conducted a Long-Term Stewardship (LTS) inspection at the INV Performance Materials LLC (Invista) Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) Facility located at 25876 DuPont Road/400 Woodland Road, Seaford, in Sussex County, Delaware (EPA ID No. DED002348845, “the Facility”) on October 10, 2023, to determine compliance with Institutional Controls (IC), and the condition and maintenance of the Engineering Controls (EngC). A 2014 amended Environmental Covenant (EC) establishes ICs limiting and/or restricting land use, land disturbance, and groundwater withdrawal and use. A 2014 Administrative Order on Consent (AOC) incorporating a 2006 Record of Decision (ROD) establishes an EngC consisting of a protective soil cover eliminating physical contact with exposed debris. Delaware’s *Regulations Governing Hazardous Waste* (DRGHW) also requires establishment of security measures limiting unauthorized access of regulated facilities; such security

measures are considered an EngC. The ICs and EngCs are applicable only to specific designated regulated areas of the Facility. A Groundwater Monitoring Evaluation inspection (GME) was performed concurrently and will be reported under separate cover.

## **BACKGROUND**

The Invista Facility manufactures nylon. It is the world's first, thus oldest, nylon-producing operation. A site-wide map of the Facility is provided in Attachment 1. The Facility was originally developed by DuPont in the 1930s. Operations at the Facility were powered by on-site coal-fired generation of electricity. Also included in Facility operations were in-house laboratory services. Predominantly, solid and hazardous waste at the Facility currently under DNREC's regulatory purview can be attributed to historical nylon production, electrical generation, and laboratory operations. Electrical power at the Facility is currently sourced from off-site generation. Waste minimization efforts have significantly reduced, but not eliminated, solid and hazardous waste generated by Facility activities. Current Facility-generated solid and hazardous wastes are temporarily stored on-site in accordance with applicable regulations pending transport for appropriate off-site treatment and/or disposal.

Amongst others, the Facility currently holds a site-specific National Pollutant Discharge Elimination System (NPDES) permit for discharges from the Facility's pre-configured modular waste water treatment system to the Nanticoke River, and a Solid Waste permit for a Coal Ash Landfill in post-closure. Historical and current Corrective Actions at the Facility under the purview of DRGHW are performed under authority of the aforementioned EC. This LTS inspection was performed in accordance with the provisions of DRGHW and the applicable associated EC and AOC/ROD. However, the Coal Ash Landfill regulated under solid waste regulations sits atop a Solid Waste Management Unit (SWMU) governed by DRGHW and the terms of the EC and AOC/ROD. Similarly, environmental sampling performed at the Facility under the auspices of DRGHW and the associated site-specific instruments consider the requirements of the NPDES permit.

For the purpose of this inspection, steel-toed shoes were deemed appropriate personal protection equipment (PPE) for the areas in which the inspection took place. During the LTS Inspection, the weather was mostly sunny with a few clouds and temperatures ranged approximately from high 60°F to low 70°F.

## **ENGINEERING & INSTITUTIONAL CONTROLS**

Table 1 (Attachment 3) summarizes the ICs and EngCs by SWMU as established via DRGHW, the AOC/ROD, and the EC, and as considered during the LTS inspection. The referenced authoritative instruments impose ICs and EngCs on a SWMU-by-SWMU basis. The SWMUs to which ICs and EngCs apply are SWMUs 1, 6, 7, 12, 13, 16, 17, and 19. The SWMU locations are depicted on the two SWMU maps, one for the northern portions of the facility and a second for the southern portions, provided in Attachment 1. In addition, the EC places ICs on a portion of Hoopers Landing Golf Course, adjacent to and owned by the Invista Facility. The AOC/ROD provides a brief description of the SWMUs, as follows for the applicable SWMUs. SWMUs 1, 6, 13, and 17 are or were landfills; SWMU 17 is specifically a coal ash landfill. SWMUs 7, 12, and 16 were settling ponds and/or retention basins. SWMU 19 and a portion of Hooper's Landing Golf Course are coal ash disposal areas. A protective soil cover and security fencing comprise the EngCs considered in the course of this LTS inspection. The ICs consist of land-use (non-residential only), land-disturbance, and groundwater-use [via Groundwater Management Zones (GMZ)] restrictions and limitations. Table 1 provides specifics as to the applicability of specific ICs and EngCs at or to specific SWMUs. Maps provided in Attachment 2 illustrate where land-use and land-

disturbance limitations have been established, and where groundwater use has been restricted. Please note the included GMZ Boundary Map neglects to include SWMU 12 as one of the areas where groundwater withdrawal is prohibited except for environmental monitoring purposes.

### Engineering Controls

Two EngCs are applicable at the above-listed SWMUs or a subset thereof. These consist of security fencing and a protective soils cover. DRGHW §264.14 states "The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons ... onto the active portion of this facility ...." The AOC/ROD requires implementation of "a protective soils cover ... over exposed debris ... to prevent potential physical hazards." The security fencing requirement applies to all SWMUs but not Hooper's Landing Golf Course, as the golf course is not considered a portion of the Facility. A protective soil cover is required to be maintained at SWMUs 13, 16, and 17.

With regard to the required security fencing, Kevin Mastaw, Invista's Environmental Engineer who accompanied the DNREC representative for the LTS inspection, indicated the entirety of Invista's approximately 500-acre Facility is fenced. Additionally, Invista employs a security staff to monitor access to the Facility. During the LTS inspection, the DNREC representative did not observe and inspect the complete length of fencing around all approximately 500 acres, but those lengths of fencing coincidentally and/or randomly observed appeared sufficiently integrous and competent to exclude unauthorized individuals. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW §264.14.

### Institutional Controls

The potential ICs consist of land-use, land-disturbance, and groundwater-withdrawal and -use restrictions. Provision 5.[a.] of the EC states "Use ... shall be restricted solely to those non-residential uses permitted within Commercial, Manufacturing, or Industrial Districts ... pursuant to the Delaware Code[.]" Provision 5.[b.] of the EC states there "shall be no digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities at depths greater than 2 feet[.]" Provision 5.[c.] of the EC states except "for environmental monitoring purposes, no groundwater shall be withdrawn from any well within the GMZ." A 2008 Memorandum of Agreement (MOA) between DNREC's Division of Air and Waste Management (AWM), now known as the Division of Waste and Hazardous Substances (WHS) and DNREC's Division of Water Resources (DOW) established two GMZs at the Invista Facility.

## **SWMU-SPECIFIC OBSERVATIONS**

The following SWMU-specific discussions are presented based upon the number of restrictions applicable to each SWMU, from most to least. SWMUs that are presented together have similar restrictions. Attachment 4 presents selected photographs taken during the LTS inspection.

### SWMU 13

The AOC/ROD describes SWMU 13 as "Solid Waste Landfill C" (Photograph Nos. 1 and 2).

Security fencing, as required by DRGHW, and a protective soil cover, as required by the AOC/ROD, comprise the EngCs at SWMU 13. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW security requirements. Observations made while traversing accessible portions of SWMU 13 on foot and by vehicle did not

reveal any exposed debris such as concrete, bricks, wood, etc. SWMU 13 appeared highly vegetated. Based upon observed conditions, Invista appears to have implemented and sufficiently maintained a protective soils cover at SWMU 13.

The ICs at SWMU 13 consist of land-use, land-disturbance, and groundwater-withdrawal and -use restrictions, as specified above. SWMU 13 is located within one of the two GMZs.

During the inspection, DNREC personnel did not observe any development, residential or otherwise, at SWMU 13. No evidence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities at depths greater than two feet were observed within SWMU 13 by DNREC personnel during the inspection. Associated with required annual groundwater monitoring, DNREC observed groundwater withdrawal from wells 12MW-14S and 12MW-15S, located within the mapped bounds of SWMU 13.

The observed lack of residential development and observed lack of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities complies with the terms of the EC. Because the EC provides an exception to the groundwater restrictions for environmental monitoring purposes, the groundwater withdrawal and use observed in SWMU 13 also complies with the terms of the EC.

#### SWMU 1

The AOC/ROD describes SWMU 1 as “Solid Waste Landfill A” (Photograph No. 3).

Security fencing comprises the EngC at SWMU 1. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW security requirements.

The ICs at SWMU 1 consist of land-use, land-disturbance, and groundwater-withdrawal and -use restrictions, as specified above. SWMU 1 is located within one of the two GMZs established in 2008.

During the inspection, DNREC personnel did not observe any development, residential or otherwise, at SWMU 1. No evidence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities at depths greater than two feet were observed within SWMU 1 by DNREC personnel during the inspection. Groundwater withdrawal from SWMU 1 was not observed during the inspection.

The observed lack of residential development; the observed lack of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities, and the observed lack of groundwater withdrawal and use within SWMU 1 complies with the terms of the EC.

#### SWMUs 6 & 19

The AOC/ROD describes SWMU 6 as “Solid Waste Landfill B” (Photograph Nos. 4 and 5) and SWMU 19 as a “Former Coal Ash Disposal Area” (Photographs Nos. 6 and 7).

Security fencing comprises the EngC at SWMUs 6 and 19. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW security requirements.

The ICs at SWMUs 6 and 19 consist of land-use and land-disturbance restrictions, as specified above. During the inspection, DNREC personnel did not observe any development, residential or otherwise, at

SWMUs 6 and 19. No evidence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities at depths greater than two feet were observed within SWMUs 6 and 19 by DNREC personnel during the inspection.

The observed lack of residential development and the observed absence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities within SWMUs 6 and 19 complies with the terms of the EC.

#### SWMUs 7 & 12

The AOC/ROD describes SWMU 7 as the “Utility Ash Settling Ponds” (Photograph No. 8) and SWMU 12 as “Retention Ponds” (Photograph No.9).

Security fencing comprises the EngC at SWMUs 7 and 12. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW security requirements.

The IC at SWMUs 7 and 12 consist of a groundwater-withdrawal and -use restriction, as specified above. SWMUs 7 and 12 are located within one of the two GMZs established in 2008. Associated with required annual groundwater monitoring, DNREC observed groundwater withdrawal from well 7MW-19S, located within or proximal to SWMU 7. No groundwater withdrawal or use from SWMU 12 was observed. Because the EC provides an exception to the groundwater restrictions for environmental monitoring purposes, the groundwater withdrawal and use observed in SWMU 7 complies with the terms of the EC. As observed, the absence of groundwater withdrawal from SWMU 12 also aligns with the requirements of the EC.

#### SWMUs 16 & 17

The AOC/ROD describes SWMU 16 as a “Trade Waste Retention Pond” (Photograph Nos. 1, 2, 10, 11, and 12) and SWMU 17 as “Coal Ash Landfill” (Photograph Nos. 1, 12, and 13) The Coal Ash Landfill is primarily regulated as a solid waste unit under Solid Waste Post-Closure Permit SW-09/01

Security fencing and a protective soil cover comprise the EngCs at SWMUs 16 and 17. Facility conditions reported by Mr. Mastaw, as well as those observed by DNREC personnel, strongly suggest Invista is in compliance with DRGHW security requirements. Observations made while traversing accessible portions of SWMUs 16 and 17 on foot and by vehicle did not reveal any exposed debris such as concrete, bricks, wood, etc. SWMU 16 appeared highly vegetated; vegetation at SWMU 17 is regularly managed in accordance with Solid Waste Post-Closure Permit SW-09/01. Based upon observed conditions, Invista appears to have implemented and sufficiently maintained a protective soils cover at SWMUs 16 and 17.

While walking the Coal Ash Landfill, stormwater was observed ponded within the northwesterly stormwater conveyance swale (Photograph No. 14). The quantity of ponded stormwater was not excessive, but was not insignificant. This violation of Invista’s solid waste post-closure permit for the Coal Ash Landfill is being managed as such, a violation of the their solid waste permit rather than non-compliance with DRGHW, the AOC/ROD, or the Invista EC.

No ICs have been established for SWMUs 16 and 17.

### Golf Course

The EC establishes restrictions upon “the coal ash beneath the golf course expansion area” (Photograph No.15) as depicted on the included Restriction Locations map.

No EngCs have been established for the golf course.

The ICs at the applicable portion of the golf course consist of land-use and land-disturbance restrictions, as specified above.

The westerly portion of the golf course, the portion reported to be underlain by coal ash, was observed from Woodland Road. During the inspection, DNREC personnel did not observe any residential development at the golf course. No evidence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities were observed at the golf course by DNREC personnel during the inspection.

While the golf course land is owned by Invista, Invista does not operate the golf course. Invista leases the land to the City of Seaford, who operates the golf course. As such, DNREC personnel visited the Hooper’s Landing Golf Course club house at 1019 West Locust Street in Seaford and spoke to Mr. Greg Thomas, Superintendent, via telephone. Mr. Thomas stated he is aware of the two-foot disturbance depth restriction, and such restriction has been incorporated into the city’s lease with Invista. Mr. Thomas indicated they occasionally disturb surficial soils for operations such as irrigation system maintenance. He reported they do not disturb soils deeper than approximately 18 inches.

The observed absence of residential development and observed and reported absence of digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities to depths greater than two feet at the golf course complies with the terms of the EC.

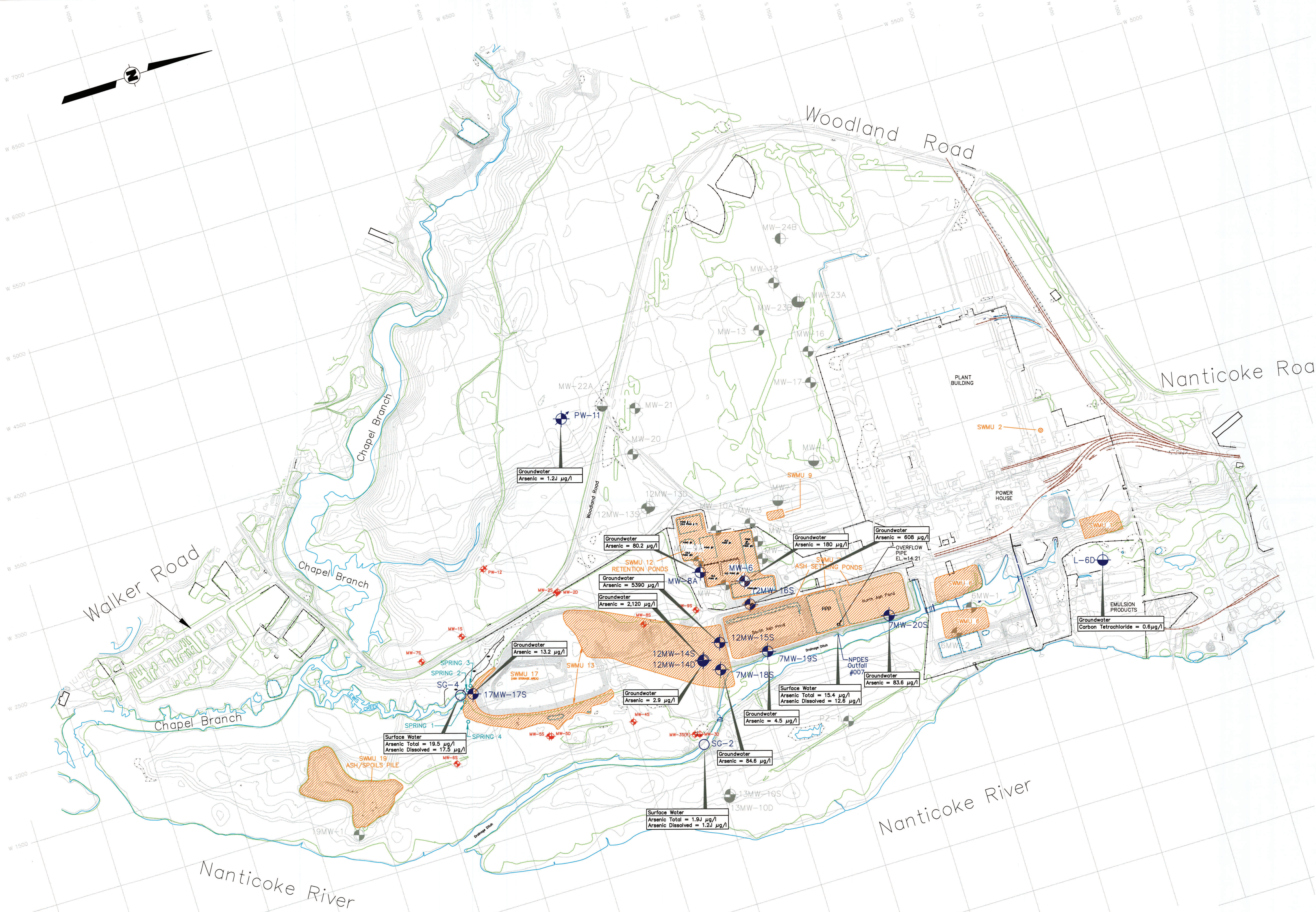
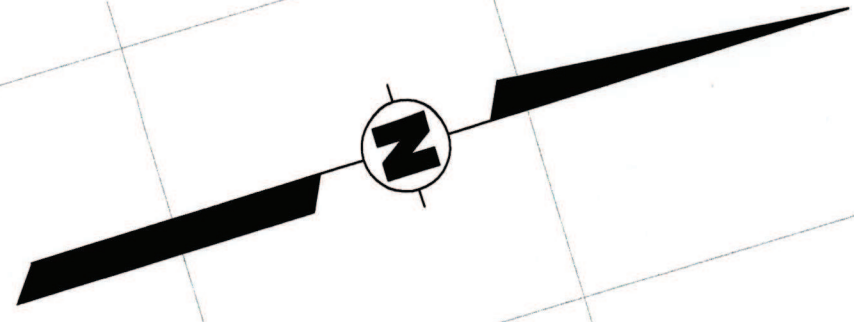
### **CONCLUSIONS & RECOMMENDATIONS**

Based upon the observed and reported conditions of the specific SWMUIs discussed herein, Invista appears to have appropriately implemented EngCs and ICs, and EngCs appear to have been sufficiently maintained to sustain effectiveness. A single non-compliant condition was observed consisting of ponding within the Coal Ash Landfill stormwater conveyance swales, which has been and continues to be addressed under the purview of Delaware’s *Regulations Governing Solid Waste* (DRGSW). No recommendations with regard to Invista’s EngCs and ICs are warranted at this time based upon conditions observed.

JRM

ATTACHMENT 1

**SITE-WIDE &  
SWMU MAPS**



**LEGEND:**  
12MW-13D FORMER RCRA PROGRAM WELLS ABANDONED SEPTEMBER/OCTOBER 2006.  
MW-8A CURRENT RCRA SAMR PROGRAM WELLS  
MW-20 CURRENT ASH LANDFILL SOLID WASTE PERMIT WELLS



NO.	REVISIONS	BY	DATE
1	Revised to Reflect SAMR Sampling Activities of Nov. 5th & 6th, 2008		1/27/09
2	Revised to Reflect SAMR Sampling Activities of Oct 18th & 19th, 2006		5/15/07
3	Revised to Reflect Phase II RFI Sample Locations of Nov. 2002		5/6/03
4	Revised in response to USEPA/DNREC comments during meeting of April 19, 2002		7/19/02
5	Revised in response to USEPA's comments of January 28, 2002		3/28/02
6	Revised in response to USEPA's comments of February 2, 2001		
7	Revised in response to USEPA's comments of December 22, 1998		
8	Revised in response to USEPA's comments of January 27, 1998		
9	Revised in response to USEPA's comments of February 3, 1994		

DESIGNED	INITIALS
SCC	
DRAWN	
DEL	
CHECKED	
M. Brill	
APPROVED(DESIGN)	
APPROVED(CONSTRUCTION)	

**Corporate Remediation Group**  
An Alliance between  
DuPont and URS | Diamond Group

Barley Mill Plaza, Building 19  
Wilmington, Delaware 19805

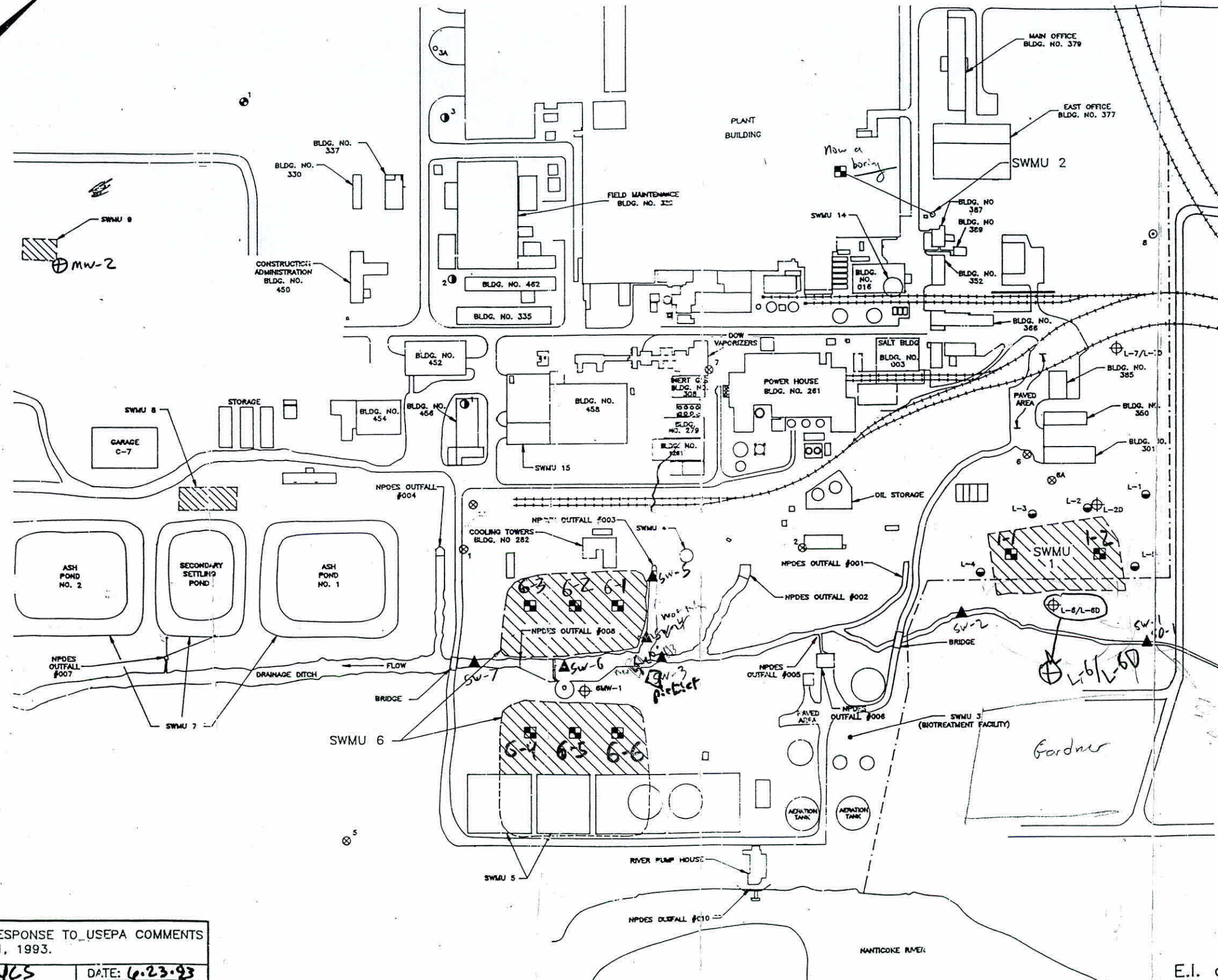
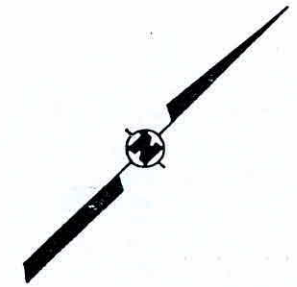
2nd ANNUAL 2008 SAMR  
SAMPLE LOCATIONS AND  
ANALYTICAL DATA RESULTS MAP  
Former DuPont Seaford Nylon Plant  
Seaford, Delaware  
**FIGURE 1**

SCALE: 1"=260'  
DATE: 1/27/09  
DRAWING NO.: [Blank]  
SHEET: 1



CAD FILE NUMBER 91-38-82  
 5-7-92  
 5-7-92  
 M.P.B.  
 W.C.S.  
 CHECKED BY  
 APPROVED BY  
 4-28-92  
 DRAWN BY  
 1:250  
 PLOT

From:  
 TASK III  
 Work PLAN



- LEGEND:
- ⊙ ACTIVE PRODUCTION WELL
  - ⊗ INACTIVE PRODUCTION WELL
  - ⊕ MONITORING WELL
  - OBSERVATION WELL (1954)
  - MONITORING WELL (1983)
  - MONITORING WELL (1988)
  - MONITORING WELL (1989)
  - TEST BORING
  - ⊕ TEST WELL
  - ⊕ PROPOSED MONITORING WELL
  - ▲ PROPOSED SURFACE WATER/SEDIMENT SAMPLE LOCATION
  - TESTPIT (TYPICALLY 10 FT. LONG)
  - PROPERTY LINE BOUNDARY
  - RAIL ROAD



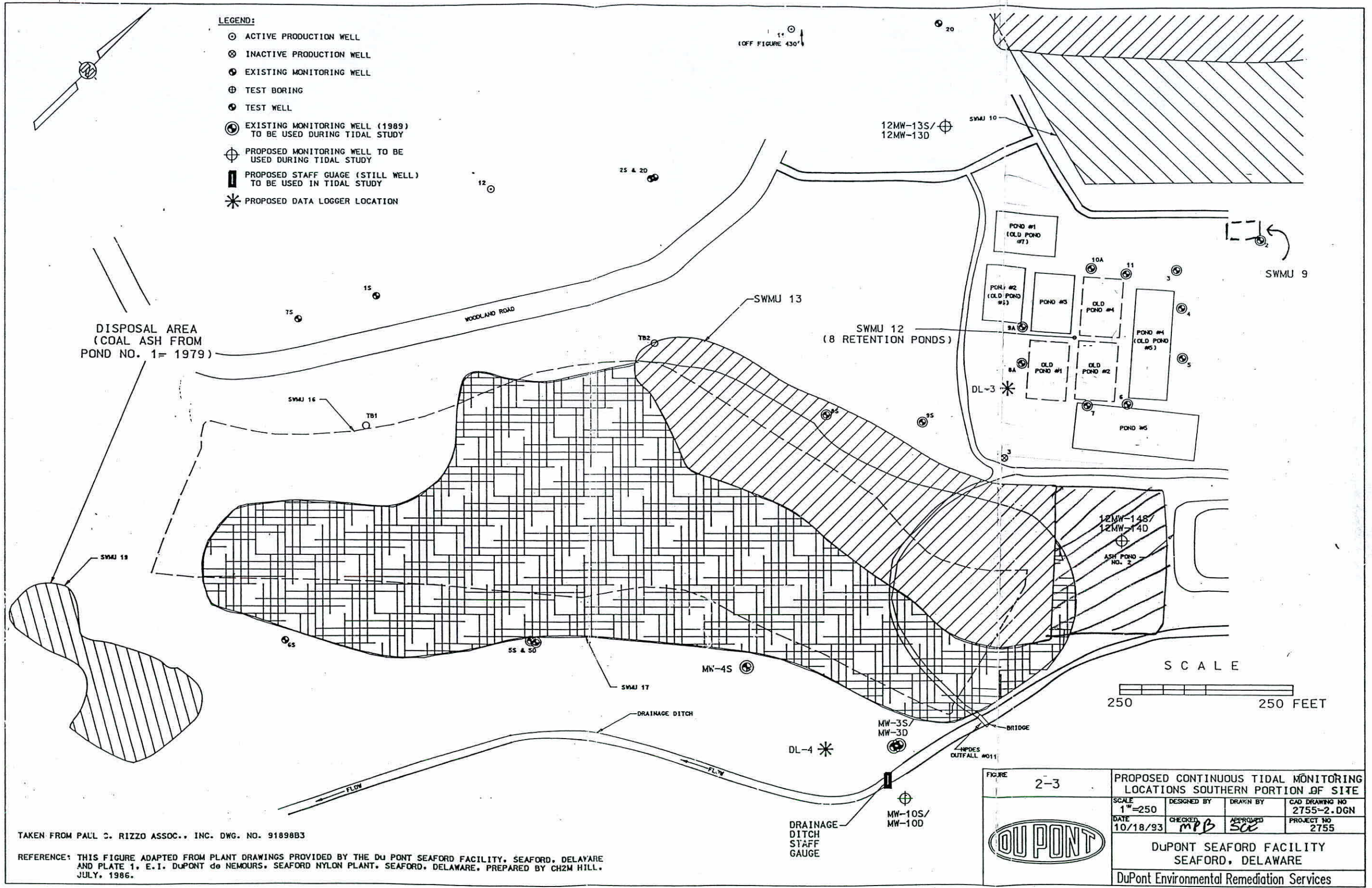
FIGURE 3-2  
 PROPOSED SAMPLE LOCATIONS  
 SWMUs 1 AND 6  
 DuPONT SEAFORD FACILITY  
 SEAFORD, DELAWARE

PREPARED FOR  
 E.I. du PONT de NEMOURS & CO., INC.  
 WILMINGTON, DELAWARE

**DCR** Paul C. Rizzo Associates, Inc.  
 CONSULTANTS

2	REVISED IN RESPONSE TO USEPA COMMENTS DATED MAY 21, 1993.
APPROVED BY:	WCS DATE: 6.23.93
1	REVISED IN RESPONSE TO USEPA COMMENTS DATED SEPTEMBER 30, 1992.
APPROVED BY:	W.C.S. DATE: 1-7-93
REVISIONS	

REFERENCE: THIS FIGURE ADAPTED FROM PLANT DRAWINGS PROVIDED BY THE Du PONT SEAFORD FACILITY, SEAFORD, DELAWARE AND PLATE 1, E.I. DuPONT de NEMOURS, SEAFORD NYLON PLANT, SEAFORD, DELAWARE, PREPARED BY CH<sub>2</sub>M HILL, JULY, 1986.

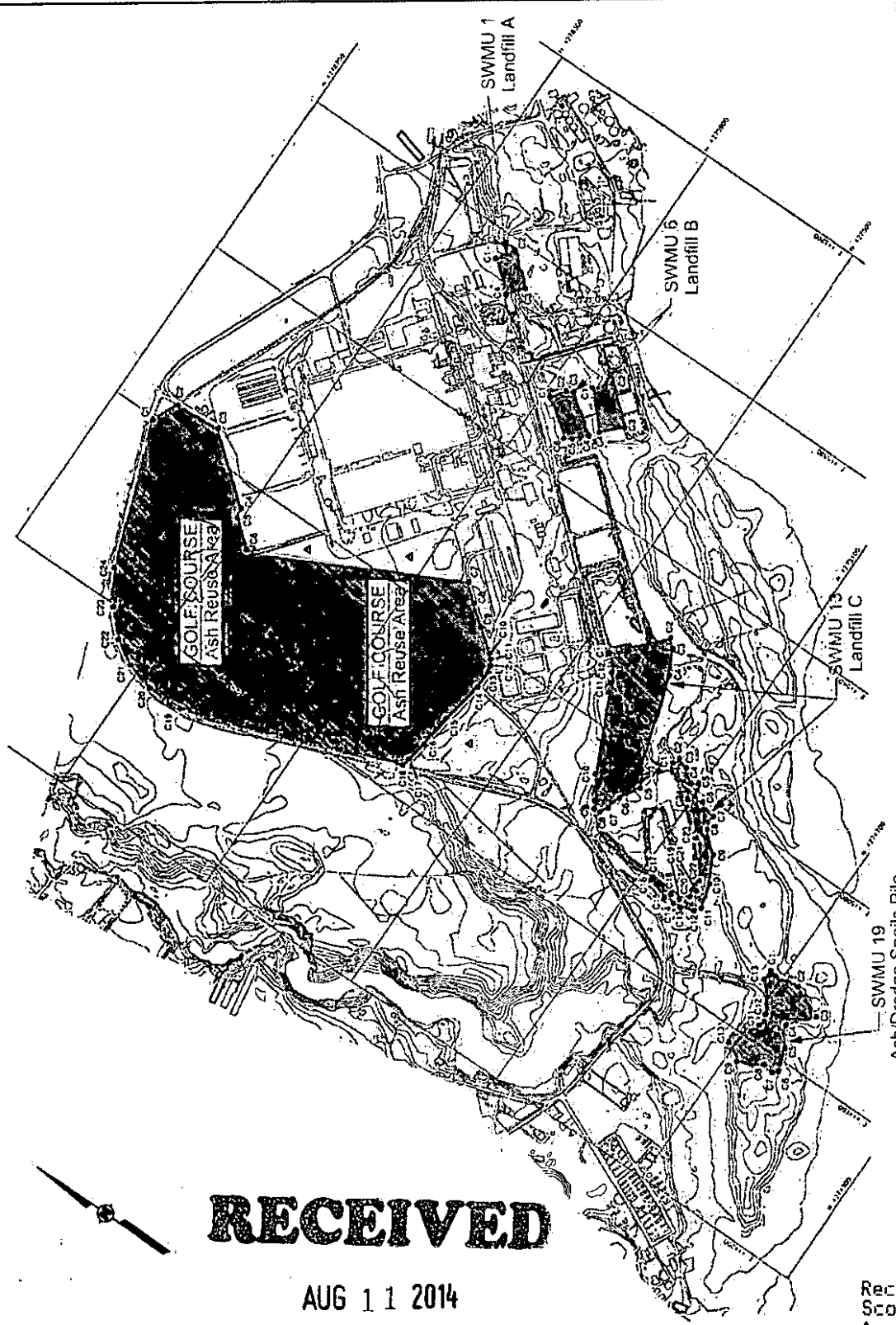


From:  
TASK III  
WORK PLAN

ATTACHMENT 2

**RESTRICTED AREAS  
& GMZ MAPS**

MAP IS SHOWN ROTATED 35 DEGREES CLOCKWISE FROM NORTH. MAP WAS "APPROXIMATED" INTO UTM ZONE 18S COORDINATES.



<b>URS</b> <small>UNIVERSITY OF RESEARCH SERVICES</small> <small>1000 MARKET STREET, SUITE 200</small> <small>PHILADELPHIA, PA 19104</small> <small>TEL: 215-382-1000</small> <small>FAX: 215-382-1001</small> <small>WWW.URS.COM</small>		ENVIRONMENTAL COVENANT RESTRICTION LOCATIONS FORMER DUPONT WASTE PLANT SEAFORD, DELAWARE SHEET NO. 1 (EXHIBIT C)
PROJECT NO. 1888217 DATE 8/15/13	PREPARED BY M. BRILL CHECKED BY J. LITTEL DATE 8/15/13	
SCALE 1" = 100'	NORTH ARROW	

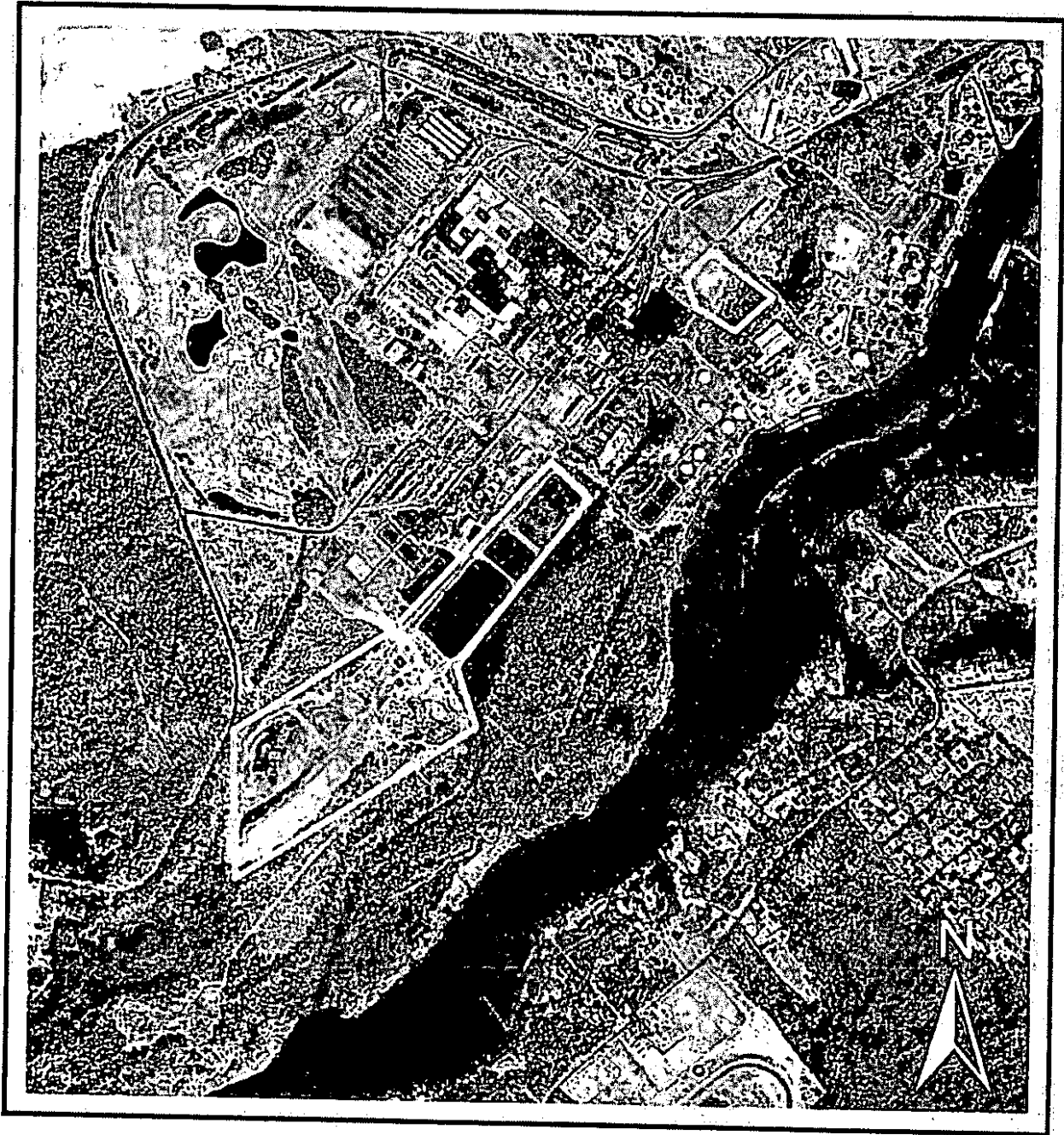
**RECEIVED**

AUG 11 2014

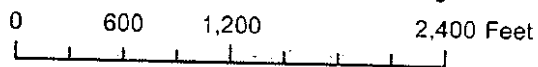
**ASSESSMENT DIVISION  
OF SUSSEX COUNTY**

Recorder of Deeds  
Scott Dailes  
Aug 11, 2014 02:26P  
Sussex County  
Doc. Surcharge Paid

# GMZ Boundary Map



Former Dupont Seaford Nylon Plant



Limit of GMZ

Drawn by FMG

ATTACHMENT 3

TABLE

**Table 1. Summary of Engineering and Institutional Controls**

SWMU <sup>1</sup>	SWMU Description	Security/ Fencing <sup>2</sup>	Protective Soil Cover <sup>3</sup>	Non-Residential Land Use <sup>4</sup>	No Land Disturbance <sup>5</sup>	Groundwater Use Restricted <sup>6</sup>
<b>Authority / Instrument</b>		DRGHW <sup>2</sup> §264.14	AOC <sup>3</sup> / ROD <sup>3</sup>	EC <sup>4</sup>		
<b>Control Type</b>		EngC <sup>7</sup>		IC <sup>8</sup>		
1	Landfill	X		X	X	X
6	Landfill	X		X	X	
7	Settling Ponds	X				X
12	Retention Basins	X				X
13	Landfill	X	X	X	X	X
16	Retention Basin	X	X			
17	Ash Landfill	X	X			
19	Coal Ash Disposal	X		X	X	
Golf Course	Coal Ash Disposal			X	X	

1. SWMU - Solid Waste Management Unit

2. Delaware's *Regulations Governing Hazardous Waste* (DRGHW) §264.14 - "The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons ... onto the active portion of this facility ..."

3. Invista's Administrative Order on Consent (AOC) containing Invista's Record of Decision (ROD) requires implementation of "a

protective soils cover over exposed debris to prevent potential physical hazards."

4. Provision 5.(a.) of Invista's Environmental Covenant (EC) states Use "... shall be restricted solely to those non-residential uses permitted within Commercial, Manufacturing, or Industrial Districts, pursuant to the Delaware Code."

5. Provision 5.(b.) of Invista's EC states there shall be no digging, drilling, excavating, grading, constructing, earth moving, or any other

and providing a justification as to why. Provision 2.(c) of the EC states that for environmental monitoring purposes, no groundwater shall be withdrawn from any

well in the Groundwater Control Management Zones (GMZ).

8. IC - Institutional Control

ATTACHMENT 4

**SELECT INSPECTION  
PHOTOGRAPHS**



## Select Photographs



**Photograph No. 1:** From SWMU 17, northerly view of SWMUs 13 and 16 where no evidence of residential development, land disturbance, groundwater withdrawal (other than for environmental monitoring), or exposed debris was observed.



**Photograph No. 2:** Westerly view of SWMUs 13 and 16 where no evidence of residential development, land-disturbing activities, groundwater withdrawal (other than environmental monitoring), or exposed debris was observed.

## Select Photographs



**Photograph No. 3:** Southeasterly view of SWMU 1 where no evidence of residential development, land-disturbing activities, or groundwater withdrawal was observed.



**Photograph No. 4:** Westerly view of the northern portion of SWMU 6, where no evidence of residential development or land-disturbing activities was observed.

## Select Photographs



**Photograph No. 5:** Northerly view of the southern portion of SWMU 6, where no evidence of residential development or land-disturbing activities was observed.



**Photograph No. 6:** Southeasterly view of the northern extent of SWMU 19, where no evidence of residential development or land-disturbing activities was observed.

## Select Photographs



**Photograph No. 7:** Easterly view of interior portions of SWMU 19, where no evidence of residential development or land-disturbing activities was observed.



**Photograph No. 8:** Northerly view across the southern portion of SWMU 7, where no evidence of groundwater withdrawal (other than for environmental monitoring) was observed.

## Select Photographs



**Photograph No. 9:** Westerly view of SWMU 12 where no evidence of groundwater withdrawal (other than for environmental monitoring) was observed.



**Photograph No. 10:** Northerly view of a northern portion of SWMU 16, where no evidence of residential development, land-disturbing activities, or exposed debris was observed.

## Select Photographs



**Photograph No. 11:** Southerly view of a northern portion of SWMU 16, where no evidence of residential development, land disturbing activities, or exposed debris was observed.



**Photograph No. 12:** Westerly view across SWMU 17 into SWMU 16, where residential development, land disturbance, groundwater use (other than environmental monitoring), or exposed debris was not observed.

## Select Photographs



**Photograph No. 13:** Southerly view of SWMU 17, a landfill with a solid waste permit, where no evidence of residential development, land disturbance, groundwater use (other than environmental monitoring), or exposed debris was observed.



**Photograph No. 14:** Northerly view of ponding in a stormwater swale along the northwesterly margin of SWMU 17, a coal ash landfill. The ponding was addressed as non-conformance with Solid Waste Post-Closure Permit SW-09/01.

## Select Photographs



**Photograph No. 15:** Easterly view of the portion of the Hooper's Landing Golf Course underlain by coal ash where no evidence of residential development or land-disturbing activities was observed.