5.0 Annual Inspection of the Falls City, Texas, UMTRCA Title I Disposal Site

5.1 Compliance Summary

The Falls City, Texas, Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I Disposal Site was inspected on January 17, 2012. The disposal cell and all associated surface water diversion and drainage structures were in excellent condition and functioning as designed. No maintenance needs or cause for a follow-up or contingency inspection was identified.

Under normal weather conditions, grass is harvested (cut and bailed) from the site, including from the disposal cell cover, two or three times a year, resulting in a successful beneficial reuse of the site. Due to ongoing drought conditions in Texas, very little hay has been harvested in the last 2 years. In-the-field discussions with vegetation and site management personnel during the annual inspection continue to be used to improve the efficiency and effectiveness of site maintenance activities.

Activity surrounding the site increased this year. County Road 202 (which parallels the northwest perimeter fence) was opened to the public. Opening this road makes the site more susceptible to potential trespass and vandalism. Oil and gas exploration has increased significantly in the area. New underground pipelines have been installed next to the site along County Road 202 and Farm-to-Market Road (FM) 1344. Traffic near the site has also increased as a result of oil and gas industry activity.

Numbers in the left margin of this report refer to items summarized in the "Executive Summary" table.

5.2 Inspection Requirements

Requirements for the long-term surveillance and maintenance of the site are specified in the *Long-Term Surveillance Plan for the U.S. Department of Energy Falls city Uranium Mill tailings Disposal Site Falls City, Texas* (DOE-LM/1602-2008, Rev. 4, U.S. Department of Energy [DOE], March 2008; LTSP) and in procedures established by DOE to comply with the requirements of Title 10 *Code of Federal Regulations* Part 40.27 (10 CFR 40.27). Table 5–1 lists these requirements.

Table 5-1. License Requirements for the Falls City Disposal Site

Requirement	Long-Term Surveillance Plan	This Report
Annual Inspection and Report	Section 3.3	Section 5.4
Follow-Up or Contingency Inspections	Section 3.4	Section 5.5
Maintenance and Repairs	Section 3.5	Section 5.6
Groundwater Monitoring	Section 3.7	Section 5.7.1
Corrective Action	Sections 3.6	Section 5.8

5.3 Institutional Controls

The 231-acre site is owned by the United States of America and was accepted under the U.S. Nuclear Regulatory Commission (NRC) general license (10 CFR 40.27) in 1997. DOE is

the licensee and, in accordance with the requirements for UMTRCA Title I sites, is responsible for the custody and long-term care of the site. Institutional controls at the site include federal ownership of the property and the following features that are inspected annually: site markers, survey and boundary monuments, warning/no-trespassing signs, a site perimeter fence, and locked gates at the site entrances.

5.4 Inspection Results

The site, southwest of Falls City, Texas, was inspected on January 17, 2012. M. Miller, K. Broberg, and D. Traub of the S.M. Stoller Corporation, the Legacy Management Support contractor at the DOE office in Grand Junction, Colorado, conducted the inspection. A. Kleinrath, the DOE Office of Legacy Management (LM) site manager, attended the inspection along with R. Lyssy (a maintenance subcontractor for the site) and K. Tu, L. Line, and M. Pimentel (of the Uranium and Technical Assessments Section, Radioactive Materials Division, Texas Commission on Environmental Quality).

The purposes of the inspection were to confirm the integrity of visible features at the site, to identify changes in conditions that may affect site integrity, and to determine the need, if any, for maintenance or additional inspections and monitoring.

5.4.1 Site Surveillance Features

The locations of site surveillance features are shown in Figure 5–1. Inspection results and recommended maintenance activities associated with site surveillance features are included in the following subsections. Photographs to support specific observations are identified in the text and in Figure 5–1 by photograph location (PL) numbers.

5.4.1.1 Entrance Gates, Entrance Signs, and Access Road

The main entrance gate (which was replaced in 2006) and the vehicle gate at the north corner of the site were found to be locked and functional (PL–1). The entrance sign located next to the main entrance gate was in good condition.

5.4.1.2 Perimeter Fence and Perimeter Signs

The five-strand barbed-wire perimeter fence, which surrounds the site property boundary, was in good condition.

There are 64 perimeter signs at the site (PL–2). The back of the signs are labeled with the appropriate sign numbers, as designated on the site drawings. All of the perimeter signs were in serviceable condition. All of the signs remain serviceable and do not require corrective action at this time; however, a few minor maintenance items noted during the inspection last year remain. Specifically:

- Perimeter sign P20 was bent, and the post is loose.
- Perimeter signs P56 and P61 contain bullet holes.
- Perimeter signs P1, P2, P3, P4, P63, and P64 are plastic and fading.

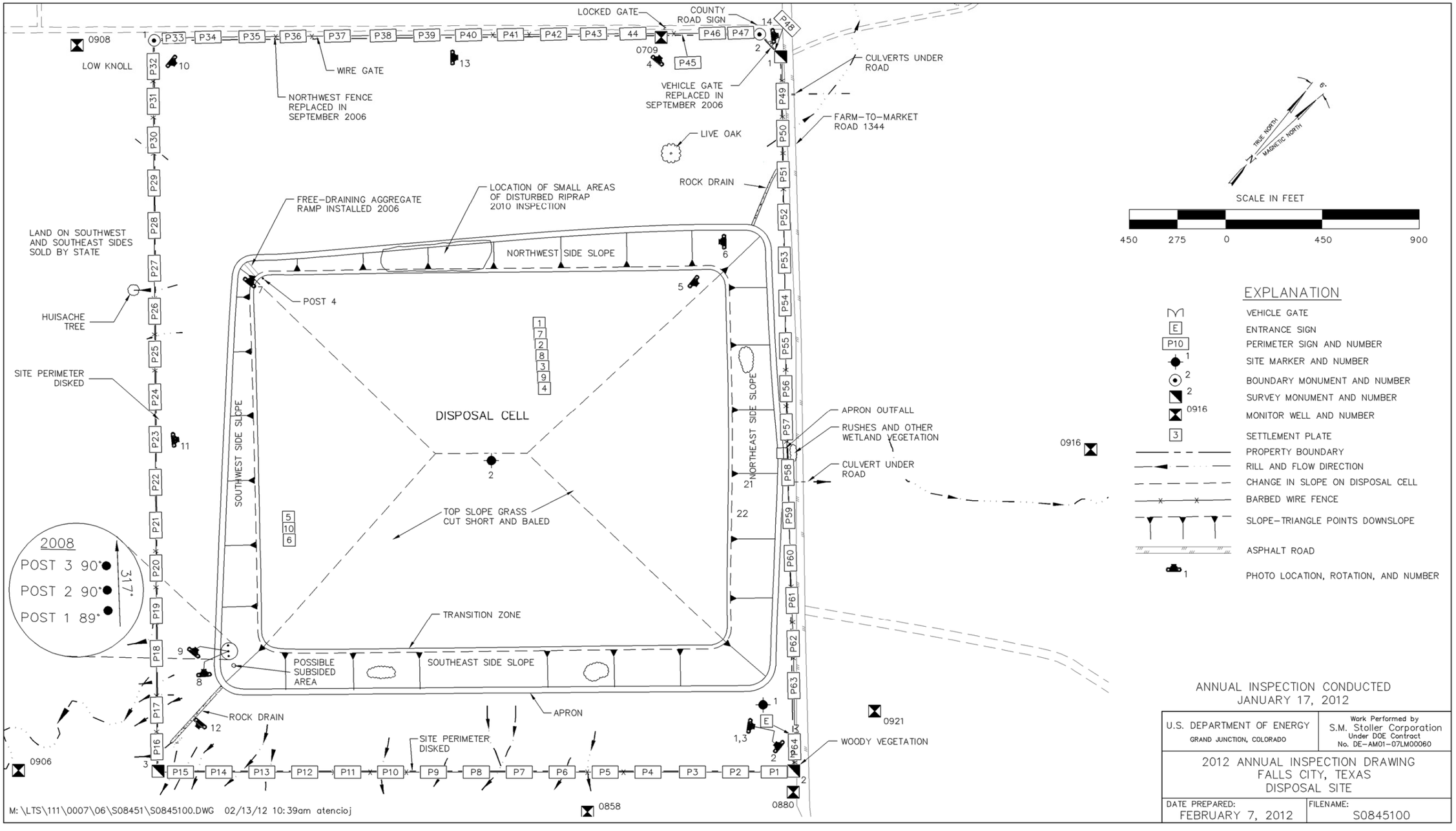

Figure 5–1. 2012 Annual Compliance Drawing for the Falls City Disposal Site

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5.4.1.3 Site Markers

There are two site markers. The marker on top of the disposal cell (SMK–2) was in excellent condition. The marker at the entrance gate (SMK–1) is also in excellent condition, but the corners of the concrete base that the marker sits on have developed cracks (PL–3). The cracks appear to be unchanged from last year. No action is required at this time to address the cracks.

5.4.1.4 Survey Monuments and Boundary Monuments

Three survey monuments and two boundary monuments are situated at the corners of the site. They were undisturbed and in excellent condition.

5.4.1.5 Monitoring Wells

Monitoring wells in the groundwater monitoring network were inspected when they were sampled in April 2011. At that time, all sampled wells were secure and in excellent condition. All monitoring wells observed during the inspection were checked to make sure that they were locked (PL–4).

5.4.2 Inspection Areas

In accordance with the LTSP, the site is divided into three inspection areas (referred to as "transects" in the LTSP) to ensure a thorough and efficient inspection: (1) the top and side slopes of the disposal cell, (2) the site perimeter, and (3) the outlying area.

Within each area, inspectors examined specific site surveillance features, such as monitoring wells, boundary monuments, and signs. Inspectors examined each area for evidence of erosion, settling, slumping, or other disturbances that might affect the site's integrity, protectiveness, or long-term performance.

5.4.3 Top and Side Slopes of the Disposal Cell

The top of the disposal cell is in excellent condition. The cell is covered with well-established coastal Bermuda grass. Kleingrass and other species are interspersed. R. Lyssy (the maintenance subcontractor) typically takes three cuttings of hay each year from the property, which includes the top of the disposal cell. Due to continued drought conditions in Texas, only one cutting was made in 2011, and this was for maintenance purposes, not for harvesting hay.

In past inspections, small desiccation cracks were present in the surface of the soil on the top and upper edges of the disposal cell. Desiccation cracks near the surface of a soil profile are common, especially in clayey or loamy soils when soil conditions are dry. No desiccation cracks were observed during this year's inspection.

Grass on the top slope of the disposal cell was cut short (PL–5). Vegetation was dense, and no sparse or barren areas were noted. No areas of ponded water were observed on top of the disposal cell. No areas of settlement were observed.

The side slopes are covered with riprap and are in excellent condition (PL–6). A couple of riprap disturbances (depressions) were observed on the northwest side slope of the disposal cell during the 2010 inspection. As reported in 2010, the disturbances did not appear to compromise the

protectiveness of the riprap side slope. The areas were checked again during the 2011 inspection and this year. No changes were observed in either year.

Evidence of fractured riprap on the side slopes of the disposal cell was not observed during this year's inspection. Previous inspections noted minor amounts of fractured riprap along the side slopes but offered no evidence to suggest that the riprap degradation was pervasive or would diminish erosion resistance. During this year's inspection, photos were taken of riprap at the base of Post 4, near the access ramp on the west corner of the disposal cell (PL–7). Compared to photos taken in earlier years at this location, there is no indication that the riprap is degrading.

In 2007, inspectors noted a possible slight slumping of riprap at the toe of the south corner of the side slope. In 2008, three t-posts were installed in a straight line running at an orientation of 317 degrees (PL–8). Each post was installed at a vertical pitch of 90 degrees. These three posts provide reference points that are used to assess if the area is undergoing movement. Movement
5A of a post out of line with the other two posts, or the change in pitch of an individual post, will indicate possible movement in the area. During the inspection, a small level was used to measure the vertical pitch of each post, and a compass was used to check the orientation of the line of the posts (PL–9). The three posts remain in the same straight line at which they were installed (i.e., 317 degrees). The vertical pitch of each post is within a degree of the installation pitch, which indicates that no movement has occurred (Table 5–2).

Table 5-2. Vertical Pitch of Posts at the Falls City Disposal Site

Post	2008 Inspection	2009 Inspection	2010 Inspection	2011 Inspection	2012 Inspection
1	90 degrees	89 degrees	89 degrees	89 degrees	89 degrees
2	90 degrees	90 degrees	90 degrees	90 degrees	90 degrees
3	89 degrees	90 degrees	89 degrees	89 degrees	90 degrees

An equipment access ramp to the top of the cell is located at the west corner of the side slope (PL–10). The ramp was installed in 2008 and constructed with clean angular riprap of progressively smaller sizes to provide a free-draining and stable driving surface that does not encourage vegetation encroachment. The ramp is in excellent shape, but it will probably need an additional layer of small gravel in the next couple of years.

Vegetation management on the cell and side slopes is excellent (PL–11). Much of the vegetation observed during the inspection on the side slopes was either dead or dormant grass. R. Lyssy has been subcontracted since 2003 to eradicate the perennial plants from the site, including the disposal cell, the riprap apron around the base of the disposal cell, and riprap-lined drainage ditches leading from the disposal cell.

During past inspections, small, scattered trees and bushes (greasewood, upland willow, mesquite, and possibly others) were observed in the riprap on the side slopes of the disposal cell. Greasewood and similar species are of particular concern because they are deep-rooted and could penetrate the radon barrier. DOE expects that control of undesirable vegetation on the side slopes will be ongoing. Such control will include cutting the deep-rooted species at ground level before the woody vegetation gets to be 1 inch in diameter, and applying a systemic herbicide to the stumps. The maintenance subcontractor will be instructed to continue efforts to eradicate woody vegetation on the side slopes.

5.4.3.1 Site Perimeter

A five-strand barbed-wire fence is installed around the disposal site. The fence on the northwest boundary of the site was replaced in 2006. The remainder of the fence was installed when the disposal site was remediated in the mid-1980s. The fence is in good condition. In the west corner of the site (near perimeter sign P33), a 16-foot-long fence panel was replaced with barbed wire in 2010 to provide additional security. Fence posts in the south corner of the site need to be straightened. Cattle have brushed up against them and pushed them over.

The area between the fence and the toe of the disposal cell is covered with well-established grass, primarily Kleingrass with some coastal Bermuda grass. During most years, these areas are cut and baled two or three times. Due to ongoing drought conditions, no hay was harvested this year from the site. One cutting was made for maintenance purposes. When performed on a regular basis, the cutting and baling process is a clean and thorough method of controlling and managing grass at this site and provides a beneficial reuse of the site. Grass is usually left uncut along the fence, along rock drains, and around some of the as-built features such as the site markers.

Evidence for wild hog burrows was observed along the fence line in some areas. The maintenance contractor fills in these burrows as they are located. Other than possibly compromising the integrity of the fence, the burrows are considered to be a minor nuisance at this time.

No water was flowing in the south rock drain during this year's inspection, but water was ponded at the end of the drain (PL–12). No water was observed in the north rock drain. Vegetation is left uncut at the outlets of the rock drains to assist in dissipating the energy of site runoff during storm events. Baffling the flow of water at the outlets helps to alleviate soil erosion near the outlet areas during large precipitation events. Tall, thick grass at the drain outlets is, therefore, desirable. Vegetation in the apron outfall, located midway along the northeast side slope, is being properly managed.

5.4.3.2 Outlying Area

The area outward from the disposal site for a distance of 0.25 mile was visually inspected, including land that was sold to Alamo Holdings in 2005. A significant increase in oil and gas industry activity was observed during this year's inspection. A gravel-supply operation is now located just northwest of the site along FM 1344. Truck traffic to and from this facility has increased significantly. During the inspection, heavy truck traffic was observed not only on FM 1344 but also on County Road 202, which runs along the northwest side of the site property (PL–13 and PL–14).

No developments or disturbances that violate deed restrictions at the site were observed. The Alamo Holdings parcel is used for occasional livestock grazing and is reverting to native brush land. A private residence just south of the disposal cell was sold in 2010, and the new owner completed construction of a barn since the inspection last year.

Up until 2011, public access to County Road 202 was restricted by a locked gate. As of the 2011 inspection, the road has been open. Removal of the lock and gate has not led to increased vandalism or trespass of the site.

5.5 Follow-Up or Contingency Inspections

DOE will conduct follow-up inspections if (1) an annual inspection or other site visit reveals a condition that must be reevaluated during a return to the site, or (2) a citizen or outside agency notifies DOE that conditions at the site are substantially changed.

No need for a follow-up or contingency inspection was identified during the inspection.

5.6 Maintenance and Repairs

5B Fence posts in the south corner of the site need to be straightened. Cattle have brushed up against them and pushed them over.

5.7 Environmental Monitoring

5.7.1 Groundwater Monitoring

NRC does not require groundwater monitoring at the site. It is conducted as a best management practice. Groundwater was sampled in April 2012 in accordance with the LTSP. Uranium
5C concentrations at monitoring well 0891 (completed in the Dilworth aquifer) decreased in 2012. The concentration measured at monitoring well 0891 in 2012 was 2.7 milligrams per liter (mg/L), down 0.2 mg/L from the concentration measured in 2011. Water levels measured in 2012 were consistent with past years.

Groundwater monitoring was conducted at the site in April 2012. As prescribed in the revised LTSP, groundwater monitoring at the site as a best management practice has two components:

1) Monitor groundwater to demonstrate the initial performance of the disposal cell (40 CFR 192, Subpart A).
2) Monitor groundwater for plume movement to demonstrate that potential users of groundwater downgradient of the site are not exposed to contamination related to the former processing site (40 CFR 192, Subpart B).

Because narrative supplemental standards apply to the uppermost aquifer at the site, no concentration limits or points of compliance have been established. Groundwater in the uppermost aquifer beneath the site has a U.S. Environmental Protection Agency designation of "limited use" (Class III) because it is not currently or potentially a source of drinking water due to widespread ambient contamination that cannot be cleaned up using methods reasonably employed by public water supply systems. Background groundwater quality varies by orders of magnitude in the area because the uppermost aquifer is in a location where uranium mineralization is naturally redistributed. For these reasons, the NRC general license does not require groundwater monitoring at the site.

Two aquifers of interest underlie the site: the shallow Deweesville/Conquista aquifer and the deeper Dilworth aquifer. Because the two aquifers are hydraulically connected, they constitute the uppermost aquifer for regulatory purposes. The Dilworth aquifer is underlain by the Manning Clay, a 300-foot-thick aquitard that isolates the uppermost aquifer from better-quality groundwater in deeper aquifers. Groundwater samples at the site are collected from both the Deweesville/Conquista aquifer and the underlying Dilworth aquifer.

The disposal cell performance monitoring network consists of five monitoring wells (0709, 0858, 0880, 0906, and 0921) that are completed in the uppermost aquifer and sampled as specified in the revised LTSP. Two additional cell performance monitoring wells (0908 and 0916), also completed in the uppermost aquifer, are designated for water-level measurements only.

The groundwater compliance monitoring network consists of five monitoring wells (0862, 0886, 0891, 0924, and 0963) that are completed in the uppermost aquifer and sampled annually as specified in the revised LTSP. Figure 5–2 shows the monitoring well networks.

The revised LTSP prescribes continued annual monitoring of the current network of wells through 2010 as a best management practice and reduces the analyte list to total uranium and field measurements of temperature, pH, conductivity, turbidity, alkalinity, dissolved oxygen, and oxidation-reduction potential.

The revised LTSP (which incorporates the *Ground Water Compliance Action Plan*, March 1998) identifies low pH levels in groundwater as an indicator of the extent and movement of the legacy groundwater plumes. Changes in the baseline geochemical conditions may also indicate leachate movement from the disposal cell into the uppermost aquifer. Tailings pore fluids were lower in pH than background groundwater was. However, because pH levels and other signature contaminants in tailings pore fluids are essentially indistinguishable from processing-related contamination, it is difficult to determine if contamination comes from the disposal cell or from legacy processing activities.

DOE has determined that pH and uranium concentrations do not co-vary. This is an indication that other factors contribute to uranium distribution in the uppermost aquifer, such as natural redistribution of uranium in this active ore-forming environment. Therefore, increasing uranium levels at a monitoring location without an attendant drop in pH probably does not indicate movement of processing-related contamination. Groundwater chemistry at monitoring locations near the formation subcrop may also be influenced by residence time as a response to precipitation or changes in oxidation state within the formation. If increases in uranium are sporadic and not accompanied by decreases in pH, DOE concludes that the elevated uranium is naturally occurring. Time-concentration plots for pH and uranium from 1996 through April 2011 are included as Figures 5–3 through 5–6.

5.7.1.1 Groundwater Quality Monitoring Results

This report considers groundwater monitoring results through April 2012. In 2012, monitoring wells were sampled for uranium and field parameters. Water levels were also measured.

At the cell performance monitoring wells, pH levels have historically been higher than the pH in tailings pore fluids, with no significant upward or downward trends. In 2012, the pH levels for the cell performance wells remained within the historical range, with the exception of well 0858. The pH measured was 6.07 standard units (s.u.), slightly above the previous high of 6.04 s.u. (Figure 5–3).

At the groundwater compliance monitoring wells, pH levels have historically been higher than the pH in the plumes of groundwater contaminated by processing activities, with no significant upward or downward trends, except that the pH at well 0963 has historically been lower than at the other locations. In 2012, the pH levels for the compliance monitoring wells remained within the historical range (Figure 5–4).

In 2012, the uranium concentration at well 0921 was elevated slightly (1.7 milligrams per liter [mg/L]) compared to 2011 (1.4 mg/L). Overall, in 2012 the uranium concentrations in the cell performance network remained relatively stable, approximately 1.7 mg/L or less, with the exception of well 0880. At well 0880, uranium has varied from a low concentration of 1.38 mg/L in 2008 to a high concentration of 14 mg/L in 2004 (Figure 5–5). Over time, the concentration of uranium in this well has varied. The pH at this location is lower than, and has varied more than, at other locations in the cell performance monitoring network (Figure 5–3). Water levels are also generally falling at well 0880 (see Section 5.7.1.2). These results suggest that the interaction among the disposal cell, the legacy groundwater mound, and processing plumes is still equilibrating. However, monitoring results do not indicate that the disposal cell is contributing to the degradation of the uppermost aquifer. Because the groundwater in the uppermost aquifer is not used as a potable water source near the site, the site remains protective.

The concentration of uranium in groundwater within the compliance monitoring network shows that the uranium concentration trends at monitoring wells 0862, 0886, and 0963 remain stable at low levels (less than 0.2 mg/L) (Figure 5–6). The increasing uranium concentration trend at well 0924 has leveled off and fluctuates between 0.5 and 0.6 mg/L. The uranium concentrations measured at well 0891 in 2009 (1.7 mg/L), 2010 (2.1 mg/L), 2011 (2.9 mg/L), and 2012 (2.7 mg/L) are anomalously high compared to historical measurements at the well, but not for the aquifer.

The uranium concentration at well 0891 in 2012 (2.7 µg/L) is down slightly from the concentration measured in 2011 (2.9 µg/L). The maximum uranium concentration measured at monitoring well 0891 in 2011 (2.9 mg/L) is below the maximum concentration reported for the aquifer, which is also the value used in the risk assessment for the Dilworth groundwater (3.04 mg/L). Site-related contamination poses no risk to the uppermost aquifer at the site because the groundwater from this aquifer is not used for human consumption, as a result of its “limited use” designation. Additionally, a 300-foot-thick aquitard isolates the uppermost aquifer from the better-quality groundwater in deeper aquifers.

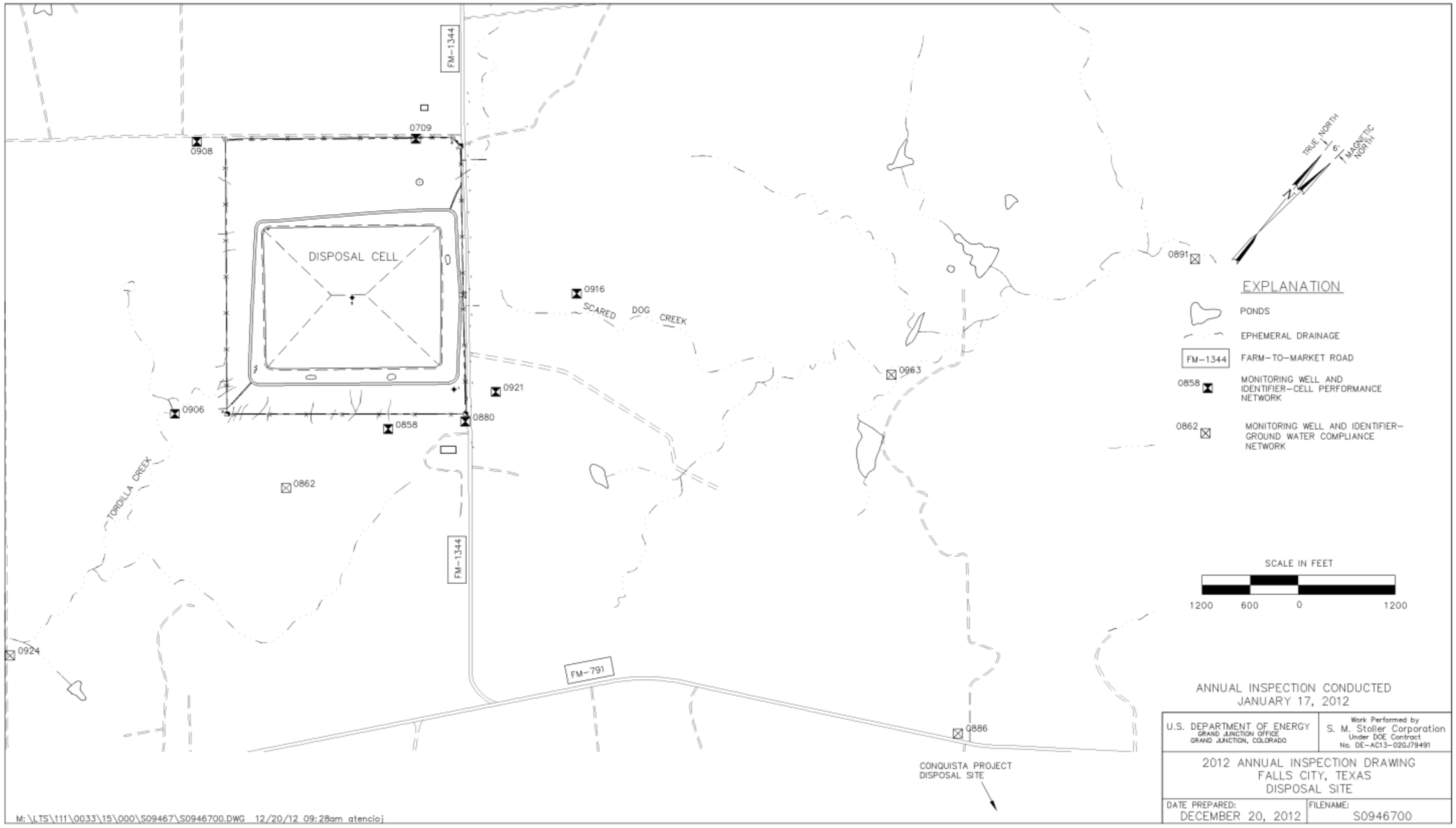

Figure 5–2. Combined Monitoring Well Network at the Falls City Disposal Site

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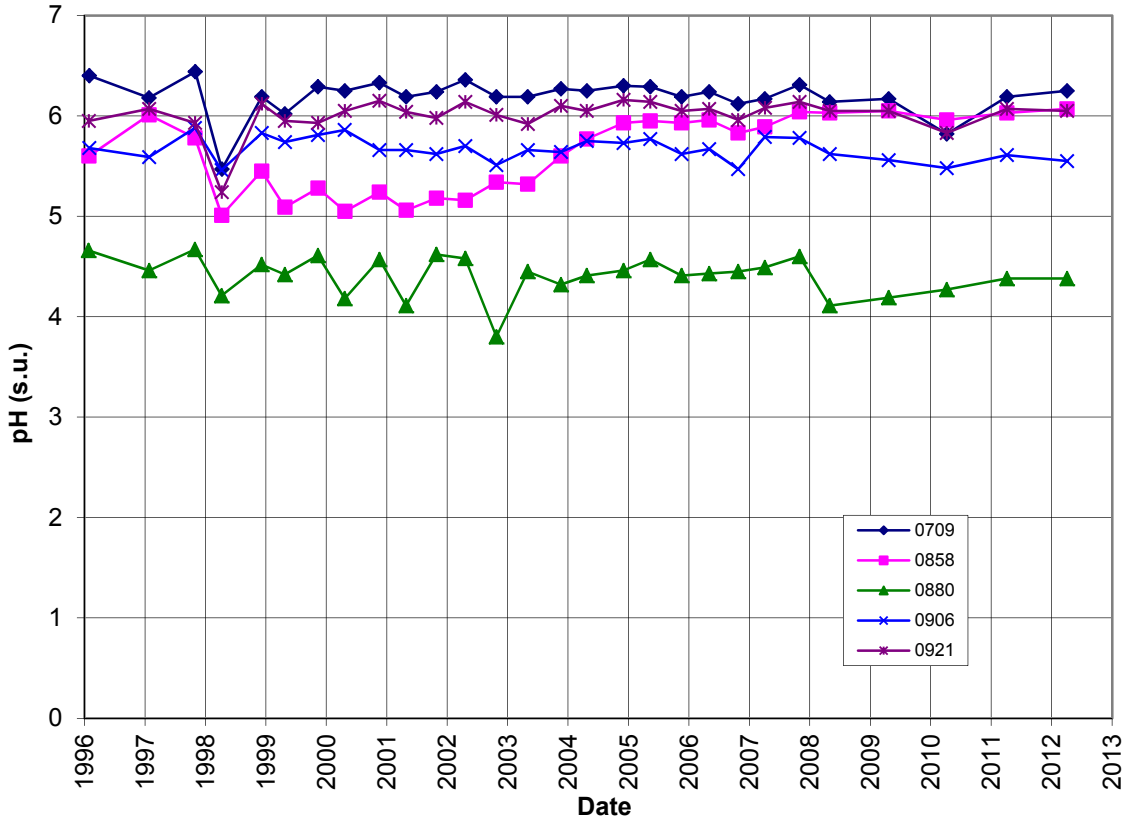

Figure 5–3. pH in Groundwater at Cell Performance Monitoring Locations at the Falls City Disposal Site

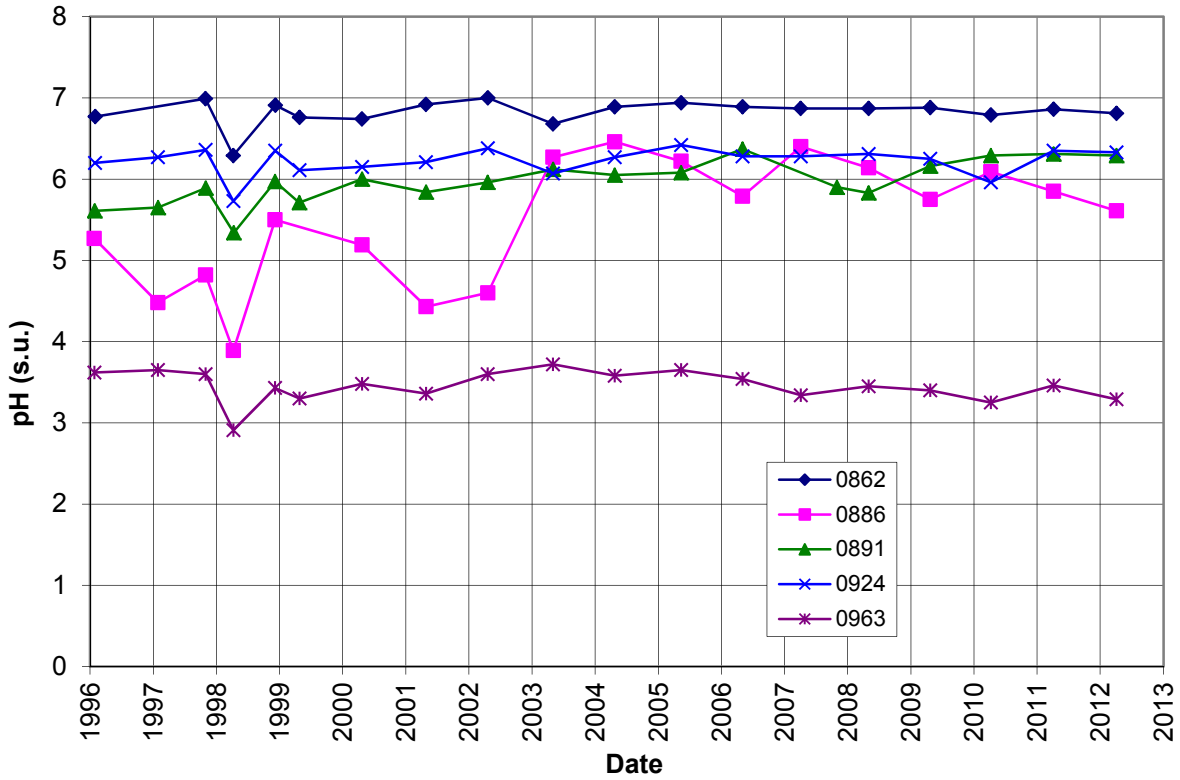

Figure 5–4. pH in Groundwater at Compliance Monitoring Locations at the Falls City Disposal Site

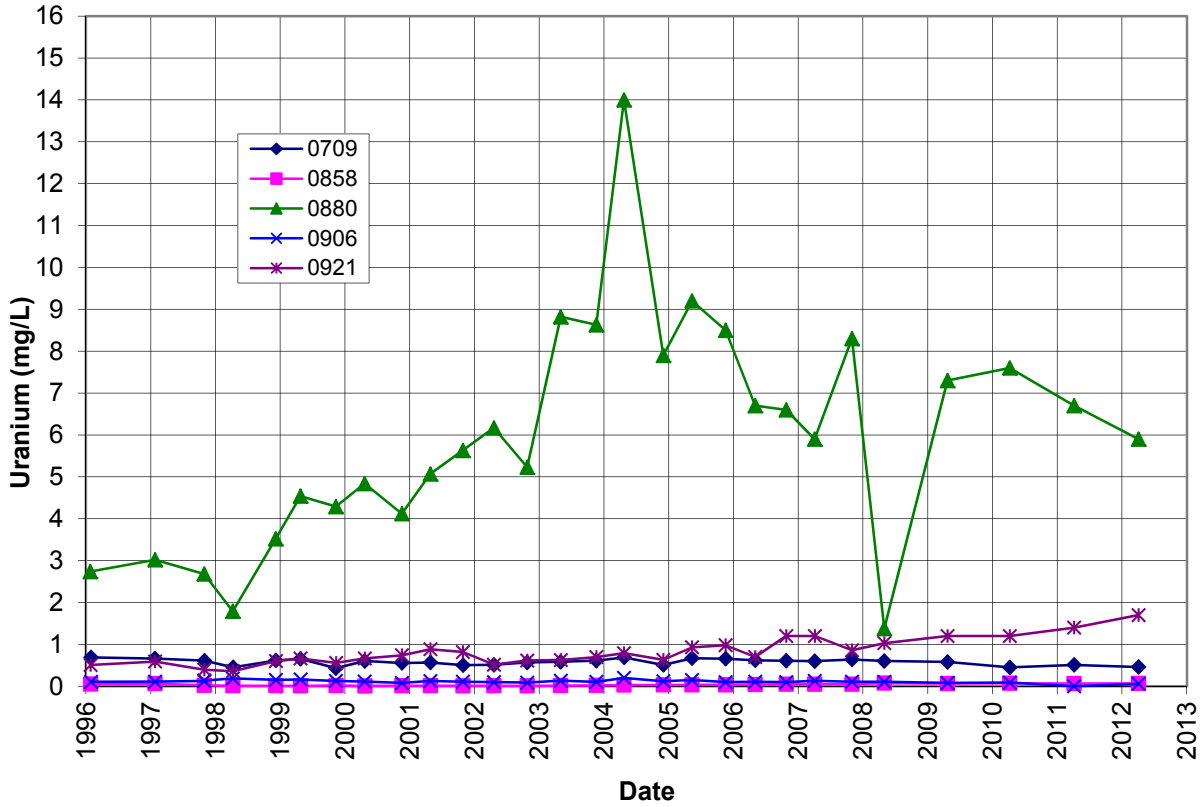

Figure 5–5. Uranium in Groundwater at Cell Performance Monitoring Locations at the Falls City Disposal Site

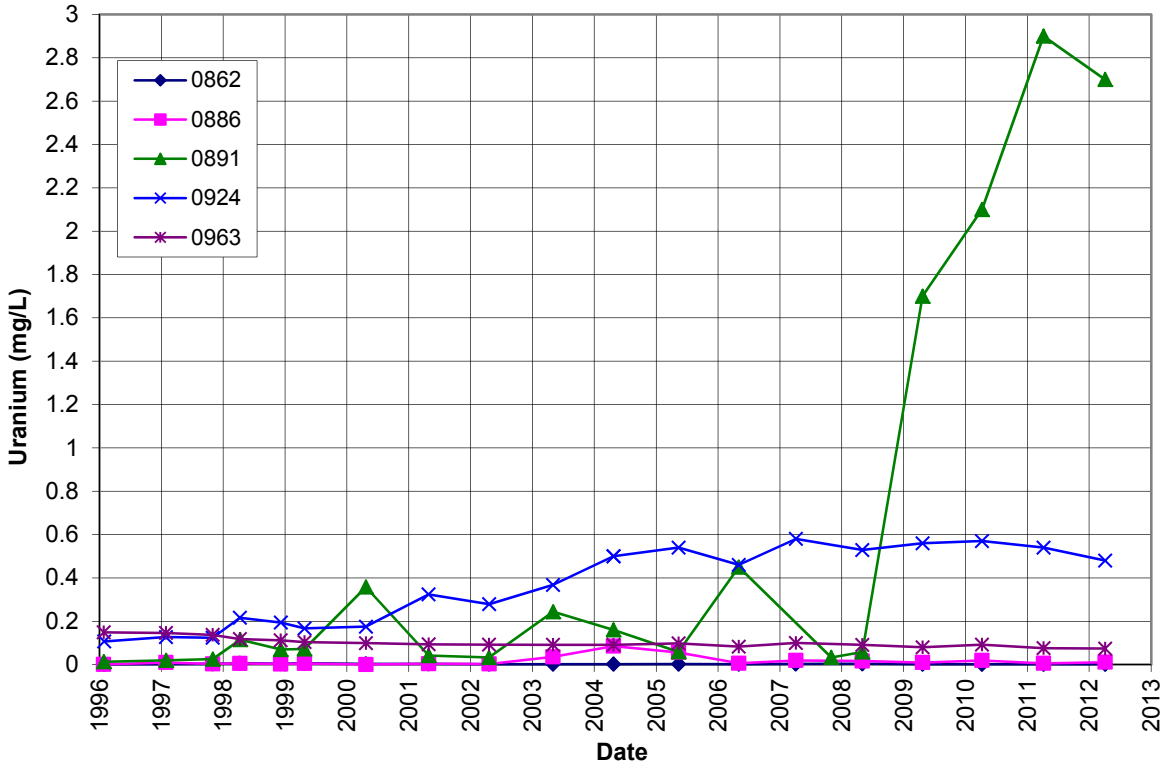

Figure 5–6. Uranium in Groundwater at Compliance Monitoring Locations at the Falls City Disposal Site

5.7.1.2 Groundwater-Level Monitoring Results

Water levels measured in 2012 in the disposal cell performance network are all new measured lows for each well (Figure 5–7). Since 1996, groundwater levels in the disposal cell performance network wells have fallen slightly. The water level in monitoring well 0906 has fluctuated more than the other wells over the years. Monitoring well 0906 is directly downslope of the disposal cell, and the historical fluctuation may be the result of the infiltration of water shed by and conveyed away from the disposal cell, reflecting variations in annual precipitation. Other contributors that may influence local groundwater levels include (1) the dissipation of the processing-site-related groundwater mound beneath the disposal cell, and (2) the dissipation of transient drainage from the disposal cell.

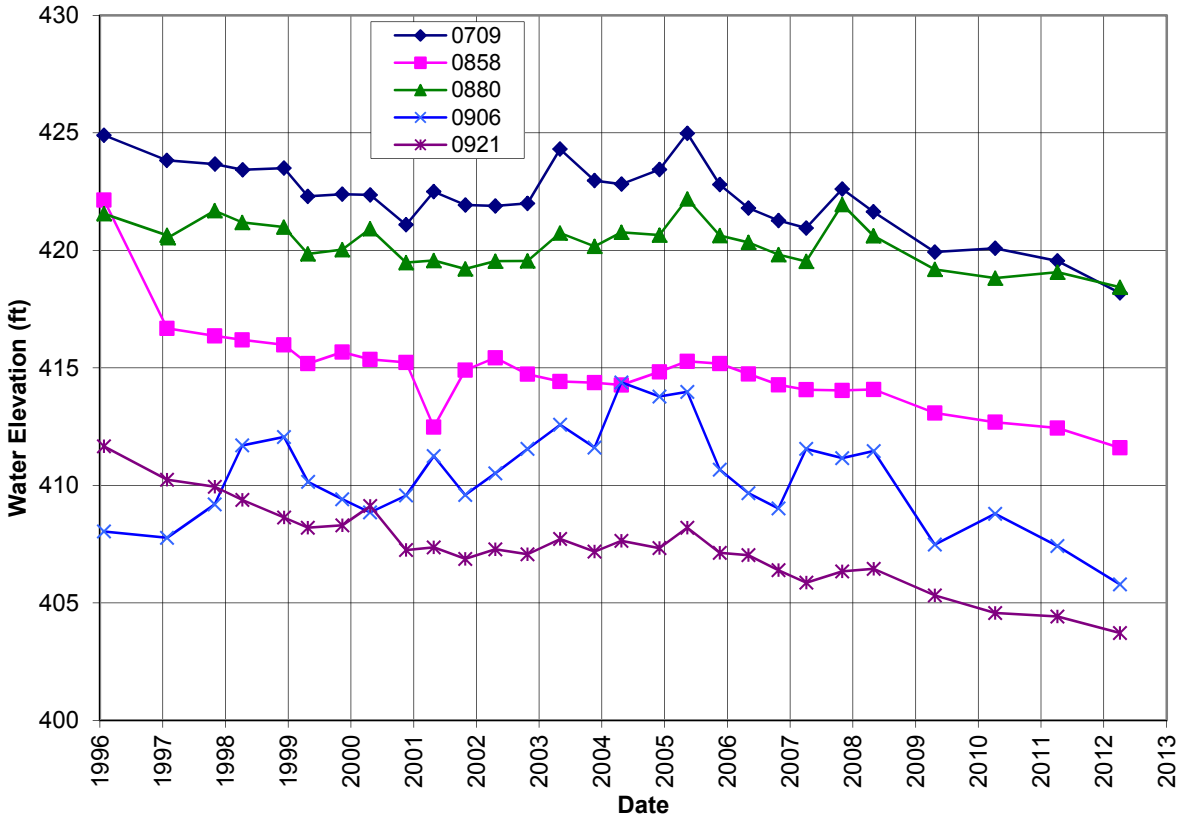

Figure 5–7. Water-Level Measurements at Cell Performance Monitoring Locations at the Falls City Disposal Site

Two cell performance monitoring wells, 0908 and 0916, are not shown in Figure 5–7. These wells, designated for groundwater-level monitoring only, are completed in the unsaturated zone of the Conquista Sandstone and have been dry since 1996.

In contrast, water levels in the groundwater compliance monitoring network wells have all increased slightly between 1996 and 2012 (Figure 5–8).

5.7.1.3 Evaluation of Groundwater Monitoring

Site-related contamination poses no risk to the uppermost aquifer at the site because groundwater from this aquifer is not used for human consumption, as a result of its "limited use" designation. Potable (domestic) water is produced locally from the Carrizo Sandstone that lies 2,000 feet

below the surface near the site. Additionally, a 300-foot-thick aquitard isolates the uppermost aquifer from the better-quality groundwater in deeper aquifers.

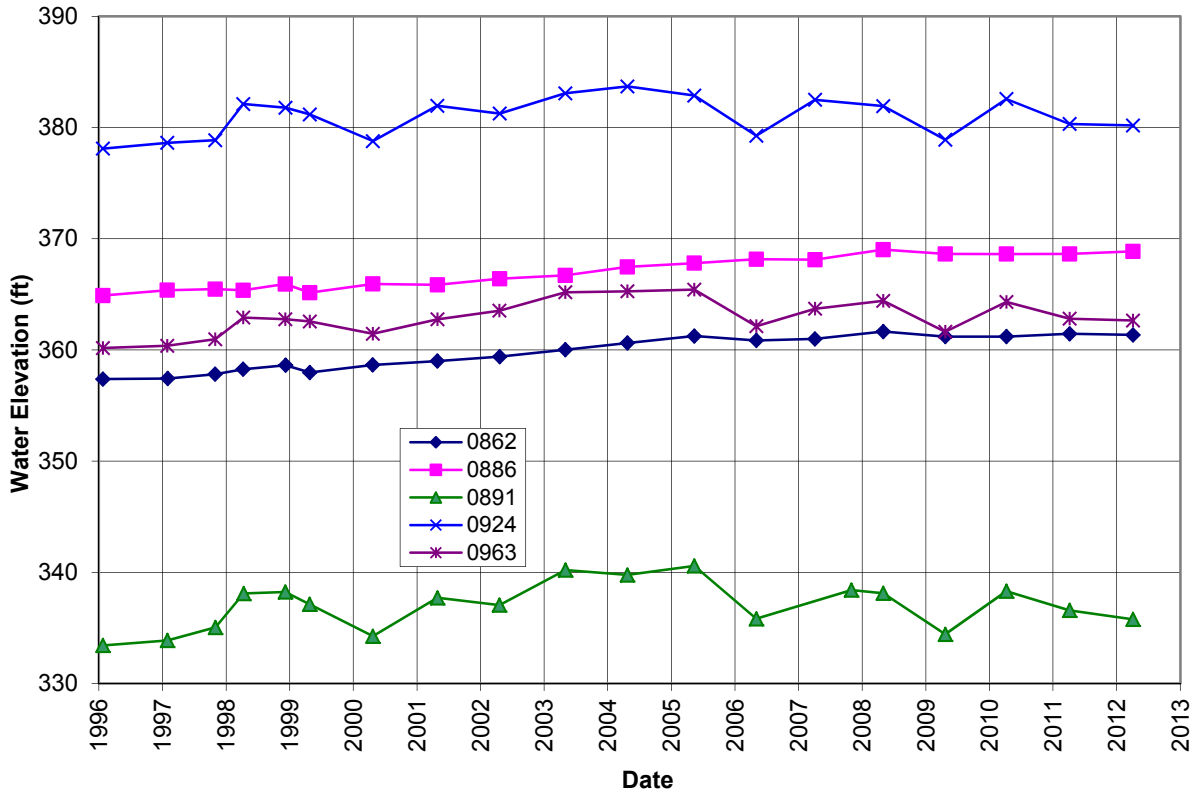

Figure 5–8. Water-Level Measurements at Compliance Monitoring Locations at the Falls City Disposal Site

In 2010, DOE evaluated the groundwater monitoring program at the site, as required every 5 years by the LTSP. Five years of additional groundwater monitoring data (2006 through 2010) at the site were compared to previous data (1996 through 2005). The comparison showed that hazardous constituent concentrations continued to fluctuate in the uppermost aquifer, but the fluctuations in the past 5 years were within the historical range reported for the aquifer in the area of the site. Uranium concentrations at monitoring well 0891 had increased from 2006 through 2010. The concentration of the sample collected in April 2011 was at an all-time high for the well, 2.9 mg/L. The comparison also showed no new unexpected water-level changes.

The 2010 evaluation recommended that after the collection of samples in 2011, groundwater monitoring activities at the site be discontinued. It was proposed that DOE would not plug and abandon the 12 monitoring wells at the site until the nearby Conquista, Texas, Title II Disposal Site is transferred to LM. The transfer is projected to occur in 2017. The Conquista site is just south of, and adjacent to, the Falls City site. Upon the Conquista site's transfer to LM, DOE will assess whether a joint monitoring approach is warranted (either as a one-time event or as periodic monitoring). Once NRC approves the recommended monitoring strategy for the Conquista site, wells no longer deemed necessary to a Conquista monitoring effort would be decommissioned following State of Texas guidelines for plugging and abandoning groundwater monitoring wells.

Recommendations made in the 2010 evaluation continue to undergo NRC review.

5.8 Corrective Action

Corrective action is taken to correct out-of-compliance or hazardous conditions that create a potential health and safety problem or that may affect the integrity of the disposal cell or compliance with 40 CFR 192.

No corrective action was required in 2012.

5.9 Photographs

Photograph Location Number	Azimuth	Photograph Description
PL–1	60	Entrance gate locked.
PL–2	270	Perimeter sign with DOE website posted.
PL–3	60	Site marker SMK–1; note cracks in concrete base.
PL–4	NA	Monitoring well 0709.
PL–5	90	View east from north corner of cell.
PL–6	230	Top of northwest side slope.
PL–7	NA	Riprap near access ramp and post 4.
PL–8	317	Line of t-posts, south corner of cell.
PL–9	NA	Pitch of post 1.
PL–10	90	Access ramp, west corner of cell.
PL–11	45	Southwest side slope.
PL–12	180	Pooled water, south rock drain.
PL–13	50	Traffic on County Road 202, northwest of site.
PL–14	45	Heavy traffic on FM 1344, northeast of site.

FCT 1/2012. PL–1. Entrance gate locked.

FCT 1/2012. PL–2. Perimeter sign with DOE website posted.

FCT 1/2012. PL–3. Site marker SMK–1; note cracks in concrete base.

FCT 1/2012. PL–4. Monitoring well 0709.

FCT 1/2012. PL–5. View east from north corner of cell.

FCT 1/2012. PL–6. Top of northwest side slope.

FCT 1/2012. PL–7. Riprap near access ramp and post 4.

FCT 1/2012. PL–8. Line of t-posts, south corner of cell.

FCT 1/2012. PL–9. Pitch of post 1.

FCT 1/2012. PL–10. Access ramp, west corner of cell.

FCT 1/2012. PL–11. Southwest side slope.

FCT 1/2012. PL–12. Pooled water, south rock drain.

FCT 1/2012. PL–13. Traffic on County Road 202, northwest of site.

FCT 1/2012. PL–14. Heavy traffic on FM 1344, northeast of site.