COMMONWEALTH of VIRGINIA

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April 23, 2019

Mr. Michael Liberati
Corteva Agriscience
Agriculture Division of DowDuPont
Chestnut Run Plaza 715-236
Wilmington, DE 19805

VIA ELECTRONIC MAIL

Re: Summer 2018 City Shops Bank Management Area Maintenance Inspection
Area of Concern 4, Former DuPont Waynesboro Plant
Waynesboro, Virginia
EPA ID# VAD003114832

Dear Mr. Liberati:

This letter acknowledges the receipt and review of the Summer 2018 City Shops Bank Management Area Maintenance Inspection dated December 3, 2018, submitted to the Virginia Department of Environmental Quality, Office of Remediation Programs (Department) by AECOM on behalf of the E.I du Pont de Nemours and Company (DuPont).

The Department has no comments on the memorandum.

If you have any questions, you may contact me at 703-583-3825 or by email at Kurt.Kochan@deq.virginia.gov.

Sincerely,

Kurt W. Kochan
Corrective Action Project Manager
Office of Remediation Programs

cc: DuPont Waynesboro Correspondence File
Ceil Mancini, Josh Collins, AECOM

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Memorandum

To	Michael Liberati, DuPont CRG Ralph Stahl, DuPont CRG	Page 1 of 2
CC	Nancy Grosso, DuPont CRG Ceil Mancini, AECOM	
Subject	Summer 2018 City Shops BMA Maintenance Inspection Former DuPont Waynesboro Site, Area of Concern 4	
From	Andrew Miano, AECOM Joshua Collins, AECOM	
Date	December 3, 2018	

This memorandum summarizes the Summer 2018 Maintenance Inspection (inspection) of the City Shops Bank Management Area (BMA) conducted June 21st 2018. It was the first post-construction inspection following completion of construction in February 2018, and followed the scope described in the Maintenance Plan included as Appendix M of the Basis of Design Report, Phase 1A BMAs, South River AOC 4 (Anchor QEA et al., 2016). The purpose of the post-construction inspection is to set identify potential BMA maintenance needs, focusing on vegetative growth, bank stability, and the integrity of the installed bank remediation features. Additional attachments to this memorandum include:

- Table 1 – Maintenance inspection log
- Appendix A - Photographic log

Findings

The results of the inspection will serve to establish the post-construction baseline condition for future maintenance inspections, and also document any significant changes from the as-built condition. A brief summary of findings is provided below; complete details of the maintenance inspection are included in Table 1.

Vegetation

- The upper portions of the bank exhibited healthy growth of rye grasses, planted saplings and native vegetation throughout the BMA.
- Planted rye grass has been effective in preventing the colonization of invasive plants, such as Japanese knotweed (*Fallopia japonica)*.
- Larger trees left in place during remediation along the BMA are healthy and show no sign of stress.
- Japanese knotweed was documented in areas of the BMA that were not remediated; these areas will be monitored and treated (if necessary) to prevent their spread into the restored portions of the BMA.

Stability

- River banks generally maintained a consistent bank angle throughout the BMA as constructed with no sign of surface erosion, scour, or undercutting at the toe of slope.

- There was no evidence of recent erosion or “at-risk” trees (e.g. trees that may no longer be stable due to erosion) within the remediated areas.
- An area of erosion upstream (outside of the remedial footprint) of Primary BMA B was documented and will continue to be closely monitored during the fall (leaf-off) inspection to evaluate the need for potential corrective action.
- Multiple “at-risk” trees were documented with localized scour and erosion, between the two remediated sections of the BMA.

Installed Features

- The installed rock toe was intact and are starting to show evidence of desired sediment deposition in some locations.
- The furthest downstream piece of installed large woody debris (LWD; location 00+850’) has shifted due to spring/summer high flows and is now projecting into the stream channel at an angle; all other LWD features were stable and anchor chains were intact.
- Geocell and erosion control fabric were intact and showed no sign of wear.
- No scour was documented at the toe of slope within the remediated portions of the BMA.

The Summer 2018 maintenance inspection conducted at the City Shops BMA documented the integrity of the BMA. The establishment of native planted grasses, saplings/live stakes, and mature trees left in place during the remediation have minimized the spread of invasive plant species into the areas cleared for the remediation.

PATH FORWARD

The following conditions documented during this inspection will be closely monitored during the winter, leaf-off inspection to identify the need for corrective action:

- Erosion at the upstream transition of the Primary BMA B area.
- Stability of the LWD at location 00+850’ (most downstream LWD) that was shifted during late spring/summer high flow events.

REFERENCES

Anchor QEA, AECOM, and E.I. du Pont de Nemours and Company. 2016. Basis of Design Report, Phase 1A Bank Management Areas, South River Area of Concern 4. September 2016.

Table 1
Summer 2018 City Shops BMA Maintenance Inspection
Former DuPont Waynesboro Site, Area of Concern 4

	Undercutting				Exposed Roots			At Risk Trees			Installed Stabilization Features Intact					Local Scour			
Station (ft)[1]	Approximate Bank Angle (Degrees)	Consistent Grade (Y/N)[2]	Notes	Photo # (Appendix A)	Exposed Roots (L/M/H)[3]	Notes	Photo # (Appendix A)	At Risk Trees Present (Y/N + #)[4]	Notes	Photo # (Appendix A)	Rock Toe/LWD (Y/N)[5]	Geocell (Y/N)[6]	Erosion Control Fabric (Y/N)[6]	Notes	Photo # (Appendix A)	Scour Present (Y/N)[7]	Notes	Photo # (Appendix A)	Overall Change Since Previous Inspection (Y/N)
00 - 25	85	Y		1,3	H	High quantity of exposed roots on the bank. 95% vegetated	1,3	Y	At risk trees present	1,2,3	NA	NA	NA		1,2,3	Y	Scour present along lower bank	1,3	NA
00 + 00	70	N (see notes)	Lower bank; ~60 degrees Upper bank; ~80 degrees	4	N	No woody plant sadjacent to edge of water; minimal vegetation present on lower bank	4	N	No woody plant sadjacent to edge of water	4	Y	Y	Y		4	Y	Some scour present at start of rock toe	4	NA
00 + 50	45	Y		5	N	Rye grasses and planted saplings growing along top of rock toe	5,6,7	N	No woody plant sadjacent to edge of water	5,6,7	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	5	N	No scour present along rock toe	5,6,7	NA
00 + 100	45	Y		8	N	Rye grasses and planted saplings growing along top of rock toe	8	N	No woody plant sadjacent to edge of water	8	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	8	N	No scour present along rock toe	8	NA
00 + 150	45	Y		9,10	NA	Rye grasses and planted saplings growing along top of rock toe	9,10	N	No woody plant sadjacent to edge of water	9,10	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	9,10	N	No scour present along rock toe	9,10	NA
00 + 200	45	Y		11,12	NA	Rye grasses and planted saplings growing along top of rock toe	11,12	N	No woody plant sadjacent to edge of water	11,12	Y	Y	Y	No Geocell or Erosion Control Fabric exposed. Rock stairs and gate present on upper half of bank	11	N	No scour present along rock toe; outfall pipe present within rock toe	11,12	NA
00 + 250	45	Y		13	NA	Rye grasses and planted saplings growing along top of rock toe	13	N	No woody plant sadjacent to edge of water	13	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	13	N	No scour present along rock toe	13	NA
00 + 300	46	Y		14	NA	Rye grasses and planted saplings growing along top of rock toe	14	N	No woody plant sadjacent to edge of water	14	Y (LWD and Rock toe)	Y	Y	Some Erosion Control Fabric exposed around tree base. LWD intact	14	N	No scour present along rock toe	14	NA
00 + 350	45	Y		15	NA	Rye grasses and planted saplings growing along top of rock toe. Some large trees present	15	N	No woody plant sadjacent to edge of water	15	Y (LWD and Rock toe)	Y	Y	Some Erosion Control Fabric exposed around tree base. LWD intact	15	N	No scour present along rock toe	15	NA
00 + 400	45	Y		16,17,18	NA	Rye grasses and planted saplings growing along top of rock toe. Some large trees present	16,17,18	N	No woody plant sadjacent to edge of water	16,17,18	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	16,17,18	Y	Minimal scour present near rock toe; two outfall pipes present within rock toe	16,17,18	NA
00 + 450	45	Y		19	NA	Rye grasses and planted saplings growing along top of rock toe. Some large trees present	19	N	No woody plant sadjacent to edge of water	19	Y	Y	Y	No Geocell or Erosion Control Fabric exposed.	19	N	No scour present along rock toe	19	NA
00 + 500	45	Y		20,21,22	NA	Rye grasses, hydrangeas, and planted saplings growing along top of rock toe. Some large trees present	20, 21	N	Some woody plant sadjacent to edge of water below the transect	22	Y	Y	Y	No Geocell or Erosion Control Fabric exposed.	20,21	N	No scour present along rock toe	20	NA
00 + 550	70	Y		23	H	Lower bank consists mostly of exposed roots	23	Y	Several large trees with exposed roots hanging over the river	23	NA	NA	NA	Section was not remediated	23	Y	Entire lower bank shows large amount sof scour	23	NA
00 + 600	75	Y		24,25,26	H	Lower bank consists mostly of exposed roots	24,25,26	Y	Sycamore has many exposed roots along the lower bank	24	NA	NA	NA	Section was not remediated	24,25,26	Y	Entire lower bank shows large amount sof scour	24,25,26	NA
00 + 650	80	Y		27	H	Large amount sof erosion have exposed many roots on the upper bank	27	Y	At risk trees present along the upper bank.	27	NA	NA	NA	Section was not remediated	27	Y	Entire bank shows large amount sof scour	27	NA
00 + 700	90	Y		28	H	Large amount sof erosion have exposed many roots on the upper bank	28	Y	At risk trees present along the upper bank.	28	NA	NA	NA	Section was not remediated	28	Y	Entire bank shows large amount sof scour	28	NA
00 + 750	90	N (see notes)	Beginning of second remediated area. ~90 upstream and ~45 downstream	29,30,31	M	Erosion has exposed roots on the upper bank on the upstream portion of this location	29, 31	Y	At risk trees present upstream of rock toe	29, 30, 31	Y	Y	Y	Beginning of second remediated section	29,30	Y	Large amount sof scour above rock toe	29,31	NA
00 + 800	40	Y		32,33	NA	Vegetation consist sof rye grasses and live stakes/planted saplings	32, 33	N	No woody plant sadjacent to edge of water	32,33	Y (LWD and Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. LWD intact	32,33	N	No scour present along rock toe	32	NA
00 + 850	25	N (see notes)	Lower bank; ~25 degrees Upper bank; ~30 degrees	34,35,36	NA	Vegetation consist sof rye grasses and live stakes/planted saplings	34,35,36	N	No woody plant sadjacent to edge of water	34,35,36	N (LWD) and Y (Rock toe)	Y	Y	No Geocell or Erosion Control Fabric exposed. ; LWD moved from its installed position. The root ball side of the installed LWD has pivoted downstream from its original position and is now angled into the river.	34,35,36	N	No scour present along rock toe	34,35,36	NA
00 + 880	20	Y		37,38	NA	Vegetation consist sof rye grasses, trees and live stakes/planted saplings	37,38	N	No woody plant sadjacent to edge of water	37,38	Y (Rock toe)	Y	Y	Some Erosion Control Fabric exposed at top of slope.	37,38	N	No scour present along rock toe and lower bank	37,38	NA

Notes:
1, Inspection station is described as the distance (feet) upstream (-) or downstream (+) from the start of the BMA (00); example, Station 00 + 50' is 50 feet downstream from the start of the BMA
2, A significant deviation from continuous bank slope or break in grade may be used as an indicator of undercutting; consistent bank grade is evaluated as Y (yes) or N (no)
3, The extent to which roots are exposed may provide a relative measure of the magnitude of apparent erosion; extent of exposed roots is evaluated as L (low), M (moderate), H (high), or NA (not applicable- no exposed roots)
4, At-risk trees (i.e., trees that lean towards the river) typically have a greater potential to fall into the river dislodge the bank soil and erosion-control products immediately around and above the tree; presence of at-risk trees is evaluated as Y (yes) or N (no)
5, Installed rock toe and large woody debris (LWD) features are monitored to ensure that they are anchored and determine whether material has sloughed, or been eroded, or moved downstream; these installed features are evaluated as Y (yes, intact), N (no, not intact), or NA (not applicable- no installed features to monitor)
6, Installed geocell and erosion control fabric are monitored to ensure that they are intact and determine whether material is exposed or visible; these installed features are evaluated as Y (yes, intact), N (no, not intact), or NA (not applicable- no installed features to monitor)
7, The presence of local scour is assessed at the toe and center of the bank, per inspection station, as well as approximately 25 feet upstream and downstream of the start and end of the BMA; the presence of scour is evaluated as Y (yes) or N (no)

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APPENDIX A
PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 1	Date: 6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 – 25'

~85 degree bank angle; at risk trees present; scour present; 95% vegetated.

Photo No. 2	Date: 6/21/2018

Direction Photo Taken:

Northeast

Description:

Station 00 – 25'

Looking upstream from location 00-25'; high quantity of exposed roots on the bank; at risk trees present; scour present; 95% vegetated.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
3	6/21/2018

Direction Photo Taken:

West

Description:

Station 00 – 25'

View looking downstream from location 00-25'; high quantity of exposed roots on the bank and scour present until beginning of rock toe.

Photo No.	Date:
4	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 00'

~60-80 degree bank angle; no at-risk trees present; no exposed roots; some scour present at edge of remediation; installed rock toe intact.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
5	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 50'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted rye grasses and native container plants; LWD intact.

Photo No.	Date:
6	6/21/2018

Direction Photo Taken:

West

Description:

Station 00 + 50'

Upstream view of 00 + 50' location; no scour present; installed rock toe intact.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
7	6/21/2018

Direction Photo Taken:

North

Description:

Station 00 + 50'

Downstream view of 00 + 50' location; Installed rock toe intact; LWD intact.

Photo No.	Date:
8	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 100'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted rye grasses and saplings on top of bank; LWD intact.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
9	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 150'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of rye grasses and planted saplings on top of bank; LWD intact.

Photo No.	Date:
10	6/21/2018

Direction Photo Taken:

North

Description:

Station 00 + 150'

Downstream view of 00 + 150'; installed rock toe and LWD intact.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 11	Date: 6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 200'

~45 degree bank angle; no scour present; installed rock toe intact; staircase / gate access present and intact.

Photo No. 12	Date: 6/21/2018

Direction Photo Taken:

North

Description:

Station 00 + 200'

Downstream view of 00 + 200'; vegetation consists of planted rye grasses and saplings; outfall pipe present within rock toe. Note presence wrack line with large branches deposited at top of rock toe during high flow events.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
13	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 250'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted rye grasses and saplings; LWD intact.

Photo No.	Date:
14	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 300'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted rye grasses and saplings; LWD intact; no at risk trees present; some erosion control fabric exposed around tree base.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
15	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 350'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of rye grasses, planted saplings and mature sycamore trees; LWD intact; some erosion control fabric exposed around tree base; no at risk trees present.

Photo No.	Date:
16	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 400'

~45 degree bank angle; slight scour present; installed rock toe intact; vegetation consists of rye grasses and mature trees; LWD intact; no at risk trees present.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 17	Date: 6/21/2018

Direction Photo Taken:

West

Description:

Station 00 + 400'

~45 degree bank angle; slight scour present; installed rock toe intact; vegetation consists of rye grasses and trees; LWD intact; no at risk trees present.

Photo No. 18	Date: 6/21/2018

Direction Photo Taken:

North

Description:

Station 00 + 400'

~45 degree bank angle; slight scour present; installed rock toe intact; vegetation consists of rye grasses and mature trees; LWD intact; two outfall pipes present within rock toe.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 19	Date: 6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 450'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of rye grasses and mature trees.

Photo No. 20	Date: 6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 500'

~45 degree bank angle; no scour present; installed rock toe intact; vegetation consists of rye grasses, hydrangeas, and mature sycamore trees.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
21	6/21/2018

Direction Photo Taken:

Southwest

Description:

Station 00 + 500'

Upstream view of 00+500' ~no scour present; installed rock toe intact; vegetation consists of rye grasses and mature trees; no at risk trees present.

Photo No.	Date:
22	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 500'

Downstream view of 00 + 500' immediately before the end of the rock toe; no scour present; installed rock toe intact.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
23	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 550' (non-remediated transect)

~70 degree bank angle; high quantity of exposed roots; at risk trees present; scour present; LWD present.

Photo No.	Date:
24	6/21/2018

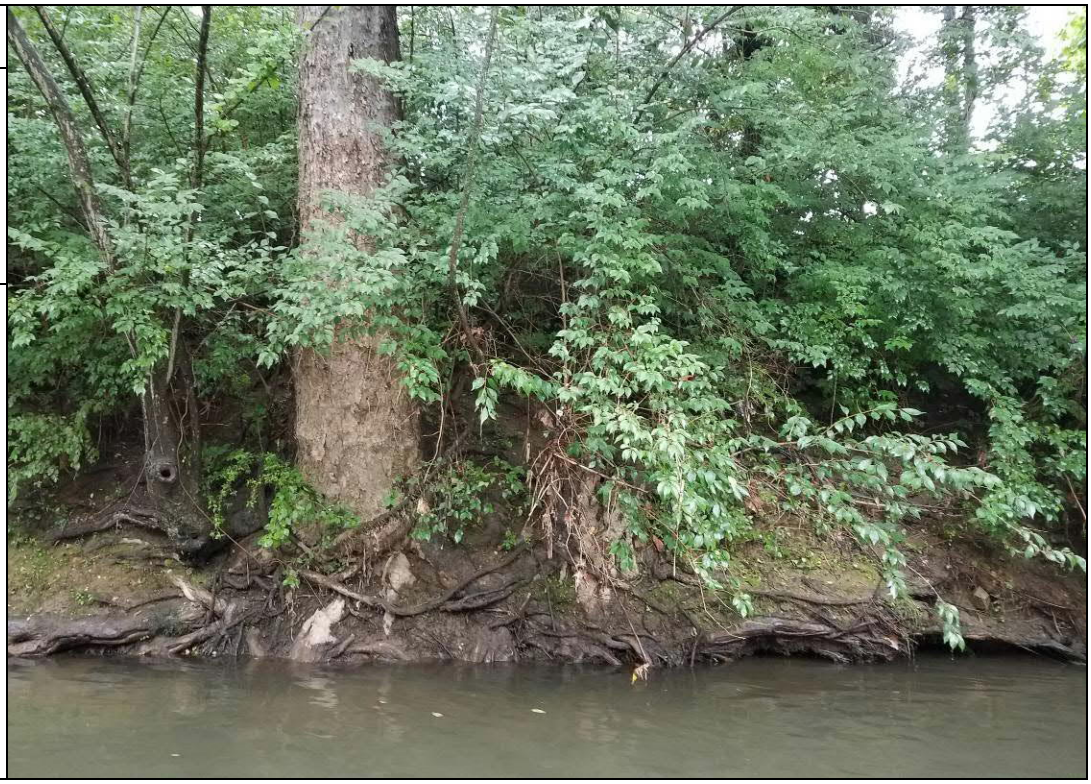
Direction Photo Taken:

Northwest

Description:

Station 00 + 600' (non-remediated transect)

~75 degree bank angle; high quantity of exposed roots; at risk trees present; scour present.



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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
25	6/21/2018

Direction Photo Taken:

Southwest

Description:

Station 00 + 600' (non-remediated transect)

Upstream view of 00 + 600'; high quantity of exposed roots; at risk trees present.

Photo No.	Date:
26	6/21/2018

Direction Photo Taken:

North Northwest

Description:

Station 00 + 600' (non-remediated transect)

Downstream view of 00 + 600'; high quantity of exposed roots; at risk trees present; scour present.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
27	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 650' (non-remediated transect)

~80 degree bank angle; high quantity of exposed roots; at risk trees present; scour present.

Photo No.	Date:
28	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 700' (non-remediated transect)

~90 degree bank angle; high quantity of exposed roots; at risk trees present; scour present.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 29	Date: 6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 750'

~90 degree bank angle; high quantity of exposed roots; scour present upstream of bank restoration

Photo No. 30	Date: 6/21/2018

Direction Photo Taken:

North

Description:

Station 00 + 750'

Upstream view of 00 + 750'; high quantity of exposed roots; scour present; at risk trees present upstream and outside of remedial footprint.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
31	6/21/2018

Direction Photo Taken:

West

Description:

Station 00 + 750'

Downstream view of 00 + 750' showing the beginning of the rock toe.

Photo No.	Date:
32	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 800'

~40 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted rye grasses and live stakes/saplings.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
33	6/21/2018

Direction Photo Taken:

Southwest

Description:

Station 00 + 800'

Downstream view of 00 + 800'; no scour present; installed rock toe intact; LWD intact.

Photo No.	Date:
34	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 850'

~25-30 degree bank angle; no scour present; installed rock toe intact; vegetation consists of planted grasses and live stakes/samplings. LWD moved from original position.

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Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No. 35	Date: 6/21/2018

Direction Photo Taken:

Southwest

Description:

Station 00 + 850'

Upstream view of 00 + 850'; no scour present along installed rock toe; planted vegetation present and healthy.

Photo No. 36	Date: 6/21/2018

Direction Photo Taken:

Northeast

Description:

Station 00 + 850'

Downstream view of 00 + 850'; LWD moved from its installed position. The root ball side of the installed LWD has pivoted downstream from its original position and is now angled into the river.

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APPENDIX A
PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.
DuPont	STM-07 (City Shops)	60559681

Photo No.	Date:
37	6/21/2018

Direction Photo Taken:

Northwest

Description:

Station 00 + 880'

~20 degree bank angle; no scour present; installed rock toe intact; vegetation consists of grasses, trees and live stakes; some erosion control fabric exposed at top of slope where herbaceous vegetation has died back.

Photo No.	Date:
38	6/21/2018

Direction Photo Taken:

Northeast

Description:

Station 00 + 880'

Downstream view of 00 + 880' at the end of the remedial footprint.