

**Safety Factor Assessment for Surface Impoundment**  
**40 CFR 257.107 (f)(11)**

The F.B. Culley West Pond posted a Notice of Intent to Initiate Closure for an Inactive Surface Impoundment in December 2015. This NOI signaled the start of closure and preliminary dewatering activities were initiated. Subsequently, a Closure Permit Application has been submitted to IDEM for review and approval. Therefore, since the pond has already initiated closure, the Safety Factor Assessment for Surface Impoundment is no longer applicable.