## 2018 ANNUAL CCR UNIT INSPECTION REPORT MARTIN LAKE STEAM ELECTRIC STATION A-1 AREA LANDFILL





## ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER 40 CFR § 257.84(b)

Rev. 1 - 12/7/2018

(b)(1) Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection must, at a minimum, include: (i) A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections); and (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.

SITE INFORMATION	
Site Name / Address	A-1 Area Landfill
	Martin Lake Steam Electric Station
	Panola County, Texas 75631
Operator Name / Address	Luminant Generation Company, LLC
	6555 Sierra Drive, Irving, TX 75039
CCR unit	CCR Landfill

INSPECTION REPORT 40 CFR § 257.84(b)(2)	
Date of Inspection 11/16/2018	
<ul> <li>(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.</li> <li>(b)(2)(ii) The approximate volume of CCR contained in the unit at the time of the inspection.</li> </ul>	Based on a review of the CCR unit's records and visual observation during the on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.  49,000,000 cubic yards of CCR have been placed in A-1 Landfill from 1980 to 2018. Luminant estimates that
	approximately 3,000,000 cubic yards of CCR were placed in A-1 Landfill since the previous annual inspection.
(b)(2)(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit	No appearances of actual or potential structural weakness of the CCR unit were visually observed during the on-site inspection. Based on an evaluation of slope stability completed in 2016 for the north embankment and conditions observed during subsequent annual inspections, no conditions were observed during the 2018 annual inspection that indicate an actual or potential structural weakness of the perimeter embankments surrounding the landfill. On-going visual inspection of areas exhibiting saturated soil conditions and potential for localized seepage will allow for identification of changes that may warrant actions in addition to dewatering activities currently being implemented by Luminant.
	A review of weekly inspection reports in the operating record also indicates no existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit. Consistent with generally accepted engineering practices, routine periodic maintenance is performed to address minor erosion and capacity of drainage features to maintain the safe operation of the CCR unit.

## INSPECTION REPORT 40 CFR § 257.84(b)(2) Date of Inspection 11/16/2018

(b)(2)(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

Based on a review of the CCR unit's records and visual observation during the on-site inspection, no other changes which may have affected the stability or operation of the CCR unit have taken place since the previous annual inspection.

## 40 CFR § 257.84(b) - Annual inspection by a qualified professional engineer.

I, Brian Thomas, certify under penalty of law that the information submitted in this report was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the state of Texas. The information submitted, is to the best of my knowledge and belief, true, accurate and complete. Based on the annual inspection, the design, construction, operation, and maintenance of the CCR Unit is consistent with recognized and generally accepted good engineering standards.

Brian Thomas, PE

Texas PE No. 91192, Expires: 12/31/2019

Date: 01/16/2019