

**2020 ANNUAL CCR UNIT INSPECTION REPORT
OAK GROVE STEAM ELECTRIC STATION
FGD PONDS**



Luminant

(b)(1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under § 257.73(d) or § 257.74(d), the CCR unit must additionally 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., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections); (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and (iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

SITE INFORMATION	
Site Name / Address	FGD-A Pond Oak Grove Steam Electric Station Robertson County, Texas 77837
Operator Name / Address	Oak Grove Management Company LLC 6555 Sierra Drive, Irving, TX 75039
CCR unit	CCR Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(b)(2)	
Date of Inspection 12/01/2020	
(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.	Based on a review of the CCR unit's records and visual observation during the on-site inspection, no changes in geometry of the embankments have taken place since the previous annual inspection. Since 2019, CCR has been removed from FGD-A and transported to Ash Landfill 1. FGD-A is scheduled for retrofitting with a new liner system in 2021.
(b)(2)(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection	Not Applicable – No Instrumentation
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;	FGD-A has a maximum design operating water surface elevation of 444 feet MSL (plus freeboard). At the time of the 2020 annual inspection, most of the impounded water had been removed from FGD-A and CCR removal was in progress. The impounded fluid level has fluctuated between 439.8 feet MSL and empty since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 50,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	A small amount of impounded water was present along the eastern portion of FGD-A at the time of the inspection. The CCR was being removed from FGD-A at the time of the inspection.

INSPECTION REPORT 40 CFR § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(vi) 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. 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 § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure 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 § 257.83(b) - Annual inspection by a qualified professional engineer.

I, Jeffrey B. Fassett, 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.



Jeffrey B. Fassett, PE
Texas PE No. 85675, Expires: 06/30/2021
Date: 01/12/2021



ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER
40 CFR § 257.83(b)

Rev. 4 - 11/15/2018

(b)(1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under § 257.73(d) or § 257.74(d), the CCR unit must additionally 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., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections); (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and (iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

SITE INFORMATION

Site Name / Address	FGD-B Pond Oak Grove Steam Electric Station Robertson County, Texas 77837
Operator Name / Address	Oak Grove Management Company LLC 6555 Sierra Drive, Irving, TX 75039
CCR unit	CCR Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.	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.
(b)(2)(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection	Not Applicable – No Instrumentation
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;	FGD-B has a maximum design operating water surface elevation of 429.5 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water and CCR in FGD-B was approximately 424 feet MSL. The impounded fluid level has fluctuated between 425.6 and 419.8 feet MSL since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 34,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 16,000,000 gallons total. Estimated 30,000 cubic yards of CCR.
(b)(2)(vi) 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. 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 § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure 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 § 257.83(b) - Annual inspection by a qualified professional engineer.

I, Jeffrey B. Fassett, 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.



Jeffrey B. Fassett, PE
Texas PE No. 85675, Expires: 06/30/2021
Date: 01/12/2021



(b)(1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under § 257.73(d) or § 257.74(d), the CCR unit must additionally 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., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections); (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and (iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

SITE INFORMATION

Site Name / Address	FGD-C Pond Oak Grove Steam Electric Station Robertson County, Texas 77837
Operator Name / Address	Oak Grove Management Company LLC 6555 Sierra Drive, Irving, TX 75039
CCR unit	CCR Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.	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.
(b)(2)(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection	Not Applicable – No Instrumentation
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;	FGD-C has a maximum design operating water surface elevation of 462 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water and CCR in FGD-C was approximately 462.7 feet MSL. The impounded fluid level has fluctuated between 463.9 and 460.5 feet MSL since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 71,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 68,000,000 gallons total. Estimated 260,000 cubic yards of CCR.
(b)(2)(vi) 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. 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 § 257.83(b)(2)

Date of Inspection 12/01/2020

(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure 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 § 257.83(b) - Annual inspection by a qualified professional engineer.

I, Jeffrey B. Fassett, 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.



Jeffrey B. Fassett, PE
Texas PE No. 85675, Expires: 06/30/2021
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