(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

<table>
<thead>
<tr>
<th>Site Name / Address</th>
<th>Northeast Bottom Ash Pond (NE BAP) Monticello Steam Electric Station Titus County, Texas 75455</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator Name / Address</td>
<td>Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75039</td>
</tr>
<tr>
<td>CCR unit</td>
<td>CCR Surface Impoundment</td>
</tr>
</tbody>
</table>

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

#### Date of Inspection 10/24/2018

- **(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; The NE BAP has a design operating water surface elevation of 384 feet MSL (plus freeboard). At the time of the 2018 annual inspection, the elevation of impounded water in the NE BAP was approximately 383.6 feet MSL. The impounded fluid level has fluctuated between 382 and 384.5 feet MSL since the previous annual inspection. With exception of approximately 3,000 cubic yards of CCR placed in the NE BAP as part of plant decommissioning, the volume of impounded CCR has not changed significantly since the previous annual inspection.

- **(b)(2)(iv)** The storage capacity of the impounding structure at the time of the inspection. Approximately 28,000,000 gallons

- **(b)(2)(v)** The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. Approximately 28,000,000 gallons (Total impounded volume). Estimated 140,000 cubic yards of CCR.
### 40 CFR § 257.83(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
### ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER

40 CFR § 257.83(b)  
Rev. 4 – 12/7/2018

(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 | West Bottom Ash Pond (W BAP)  
Monticello Steam Electric Station  
Titus County, Texas 75455 |
|---------------------|------------------------------------------------------------------|
| Operator Name / Address | Luminant Generation Company, LLC  
6555 Sierra Drive, Irving, TX 75039 |
| CCR unit | CCR Surface Impoundment |

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

Date of Inspection 10/24/2018

| (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; | The West BAP has a design operating water surface elevation of 384 feet MSL (plus freeboard). At the time of the 2018 annual inspection, the elevation of impounded water in the West BAP was approximately 383.6 feet MSL. The impounded fluid level has fluctuated between 382 and 384.5 feet MSL since the previous annual inspection. With exception of approximately 5,000 cubic yards of CCR placed in the West BAP as part of the plant decommissioning, the volume of impounded CCR has not changed significantly since the previous annual inspection. |
| (b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 35,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Approximately 35,000,000 gallons (Total impounded volume). Estimated 152,000 cubic yards of CCR. |
40 CFR § 257.83(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
(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.

<table>
<thead>
<tr>
<th>SITE INFORMATION</th>
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<tbody>
<tr>
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<tr>
<td>Operator Name / Address</td>
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<td></td>
</tr>
<tr>
<td>CCR unit</td>
</tr>
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<table>
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<tr>
<th>INSPECTION REPORT 40 CFR § 257.83(b)(2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Inspection 10/24/2018</td>
</tr>
</tbody>
</table>

(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;
The SW Pond has a design operating water surface elevation
of 384 feet MSL (plus freeboard). At the time of the 2018
annual inspection, the elevation of impounded water in the
SW Pond was approximately 383.6 feet MSL. The
impounded fluid level has fluctuated between 382 and
384.5 feet MSL since the previous annual inspection. The
volume of impounded CCR has not changed significantly in
the SW Pond since the previous annual inspection, as CCR is
primarily managed in the Northeast and West bottom ash
ponds.

(b)(2)(iv) The storage capacity of the impounding structure at
the time of the inspection
Approximately 46,000,000 gallons

(b)(2)(v) The approximate volume of the impounded water
and CCR contained in the unit at the time of the inspection.
Approximately 46,000,000 gallons (Total impounded
volume). Estimated less than 25,000 cubic yards of CCR.
### INSPECTION REPORT 40 CFR § 257.83(b)(2)
Date of Inspection 10/24/2018

<table>
<thead>
<tr>
<th>(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</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.</td>
<td>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.</td>
</tr>
</tbody>
</table>

#### 40 CFR § 257.83(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