(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

(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 approximate volume of CCR contained in the unit at the time of the 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.
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