

**2020 ANNUAL CCR UNIT INSPECTION REPORT
MARTIN LAKE STEAM ELECTRIC STATION
ASH POND AREA**



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 | East Ash Pond (EAP) Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75658 |
| CCR unit | CCR Surface Impoundment |

| INSPECTION REPORT 40 CFR § 257.83(b)(2) | |
|--|---|
| Date of Inspection 11/10/2020 | |
| (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. The EAP was retrofitted in 2020 with a liner system meeting the requirements of 40 CFR § 257.70(c). |
| (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 EAP has a design operating water surface elevation of 328 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the impounded water and CCR in the EAP was 324.67. The impounded fluid level has fluctuated between 328.92 ft 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 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 29 million gallons of impounded water and less than 25,000 cy of CCR were present at the time of the inspection. |
| (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 11/10/2020

(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, PE, 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

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|-------------------------|--|
| Site Name / Address | West Ash Pond (WAP) Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75658 |
| CCR unit | CCR Surface Impoundment |

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

Date of Inspection 11/10/2020

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| (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. CCR is being removed from the WAP in preparation for retrofitting the CCR Unit with a new liner system. The CCR is being transported via railcar to the A-1 Area Landfill. |
| (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 WAP has a design operating water surface elevation of 328 feet MSL (plus freeboard). At the time of the 2020 annual inspection CCR was being removed from the impoundment. The impounded fluid level has fluctuated between 329.3 and 317.7 feet MSL since the previous annual inspection. |
| b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 68,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Approximately 5,000,000 gallons. Estimated 150,000 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)

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Date of Inspection 11/10/2020

(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, PE, 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.



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| SITE INFORMATION | |
|-------------------------|---|
| Site Name / Address | New Scrubber Pond (NSP) Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75658 |
| CCR unit | CCR Surface Impoundment |

| INSPECTION REPORT 40 CFR § 257.83(b)(2) | |
|--|--|
| Date of Inspection 11/10/2020 | |
| (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; | The NSP has a design operating water surface elevation of 328 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water and CCR in the NSP was approximately 328.3 feet MSL. The impounded fluid level has fluctuated between 329.4 and 326.1 feet MSL since the previous annual inspection. |
| (b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 64,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Approximately 64,000,000 gallons (Total impounded volume). Estimated 300,000 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 |

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Date of Inspection 11/10/2020

(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, PE, 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.



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