

**2019 ANNUAL CCR UNIT INSPECTION REPORT
SANDOW STEAM ELECTRIC STATION
AX LANDFILL**



Luminant

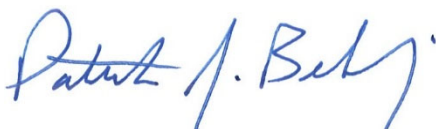
(b)(1) Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering 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	AX Landfill Sandow 5 Generating Plant Milam County, Texas 76567
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 10/23/2019	
(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.	Estimated 4,900,000 cubic yards of CCR have been placed in the AX Landfill from 2015 through 2018. During 2019, no CCR placement occurred in the landfill.
(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. 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.
(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, Patrick J. Behling, 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.



Patrick J. Behling, PE
Texas PE No. 79872, Expires: 06/30/2020
Date: 01/07/2020

