

(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 / Date of Inspection | Duck Creek Power Station<br>Fulton County, Illinois 61520<br>9/15/2025 |
| Operator Name / Address                  | Luminant Generation Company LLC<br>6555 Sierra Drive, Irving, TX 75039 |
| CCR unit                                 | Ash Pond No. 1                                                         |

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

|                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.                                                                                                                                       | Cap and closure of Ash Pond No. 1 completed in 2022.                                                                                                                                                                                                                                         |
| (b)(2)(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection                                                                         | See the attached.                                                                                                                                                                                                                                                                            |
| b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;                                                                              | See the attached.                                                                                                                                                                                                                                                                            |
| b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection                                                                                                                                       | Cap and closure of Ash Pond No. 1 completed in 2022.                                                                                                                                                                                                                                         |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.                                                                                                           | Approximately 2500 acre-feet of CCR material capped and closed.                                                                                                                                                                                                                              |
| (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 | Based on a review of the CCR unit's records and visual observation during the on-site inspection, there was no appearance of an actual or potential structural weakness of the CCR unit, nor an existing condition that is disrupting or would disrupt the operation and safety of the unit. |

(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, James P. Knutelski, P.E., 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 Illinois. 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.



James Knutelski, PE  
Illinois PE No. 062-054206, Expires: 11/30/2027  
Date: 12/22/2025

Site Name: Duck Creek Power Station  
 CCR Unit: Ash Pond No. 1

| 40 CFR § 257.83(b)(2)(ii) |            |                                                                |
|---------------------------|------------|----------------------------------------------------------------|
| Instrument ID #           | Type       | Maximum recorded reading since previous annual inspection (ft) |
| PZ1                       | Piezometer | Abandoned                                                      |
| B5                        | Piezometer | Abandoned                                                      |

| 40 CFR § 257.83(b)(2)(iii) |                               |         |         |            |         |         |
|----------------------------|-------------------------------|---------|---------|------------|---------|---------|
| Since previous inspection: | Approximate Depth / Elevation |         |         |            |         |         |
|                            | Elevation (ft)                |         |         | Depth (ft) |         |         |
|                            | Minimum                       | Present | Maximum | Minimum    | Present | Maximum |
| Impounded Water            |                               | 0       |         |            | 0       |         |
| CCR                        | 622                           |         | 655     | 52         |         | 85      |