

**2024 ANNUAL CCR UNIT INSPECTION
REPORT COLETO CREEK POWER, LLC
PRIMARY ASH POND
GOLIAD COUNTY, TEXAS**

OCTOBER 2024



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ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER

30 TAC § 352.831(a) and 40 CFR § 257.83(b)

Rev. 1 - 1/10/2020

(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	Primary Ash Pond (PAP) Coletto Creek Power Station 45 FM 2987, Goliad County, TX
Operator Name / Address	Coletto Creek Power, LLC 45 FM 2987, Goliad County, TX
CCR unit	CCR Surface Impoundment

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

Date of Inspection 9/18/2024

(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 PAP has a maximum storage pool water surface gauge elevation of 135.7 (136.1 feet NAVD88). At the time of the 2024 annual inspection the elevation of impounded water in the PAP was approximately 124.5 (gauge). Based on information provided by site personnel, water levels in 2023 and 2024 ranged from approximately elevation 120.5 to 126.4 (gauge). Dry CCR was observed as in previous years within the south portion of the PAP to elevations of approximately 140 feet NAVD88, and in discrete storage areas to approximately 145 feet NAVD88. An interior perimeter ditch system located within the PAP between the solid CCRs and the perimeter CCR dike system routes contact storm water runoff from the CCRs in the south portion of the PAP to the north, ponding portion of the PAP.
b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 3,700 AC-FT (elevation 139.7, NAVD88).
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 3,000 AC-FT. Note, this estimated volume includes dry placed CCRs up to elevation 139.7 (NAVD88), and not discrete dry storage area elevations above 139.7.

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

Date of Inspection 9/18/2024

(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

Erosion was observed on exterior levee at approximately STA 7+50 – Site personnel were notified and are addressing this erosion maintenance repair with on-site contractor. No evidence of slope movements or misalignments that have the potential to affect the structural integrity of the PAP were noted. No conditions were observed that indicate an immediate structural weakness of the perimeter embankments surrounding the PAP. At approximate STA 7+00, a process-water pipe that penetrates through the upper 2 feet of the perimeter dike and into the PAP interior was observed to be leaking at the interior top of dike crest. On site contractor stopped the leakage during time of inspection. The historic seep area between dike STA 84+00 and 90+00 appeared dry. Conditions observed during the annual inspection indicate that a disruption or the potential for disruption of the operation and safety of the CCR unit is not currently anticipated.

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

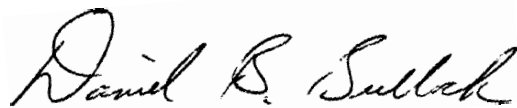
Date of Inspection 9/18/2024

(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

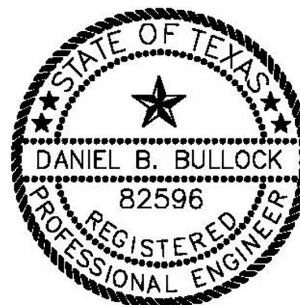
Based on a review of the CCR unit's records and visual observation during the on-site inspection, no other changes which may have affected the stability or operation of the CCR unit have taken place since the previous annual inspection.

30 TAC § 352.831(a) and 40 CFR § 257.83(b) - Annual inspection by a qualified professional engineer.

I, Dan Bullock, 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.



Dan Bullock, PE
Texas PE No. 82596, Expires: 06/30/2025
Date: 10/11/2024



10/11/2024