2023 ANNUAL CCR UNIT INSPECTION REPORT MARTIN LAKE STEAM ELECTRIC STATION ASH POND AREA



(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 Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75039 |
| CCR unit | CCR Surface Impoundment |

| INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023 | |
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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 embankments 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 EAP has a design operating water surface elevation of 328 feet MSL (plus freeboard). At the time of the 2023 annual inspection, the impounded water and CCR in the EAP was 327.4 feet MSL. The impounded fluid level has fluctuated between 322.0 and 327.4 ft MSL since the previous annual inspection. |
| b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 41,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Approximately 39 million gallons (total impounded volume) and approximately 32,500 cy of CCR were present at the time of the inspection. |

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023

(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

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 8/31/2023

(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, David C. Vogt, 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.

David C. Vogt, PE

Texas PE No. 93905, Expires: 03/31/2023

HDR Firm Registration No. F-754

Date: 10/6/2023



10/6/2023

(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 | West Ash Pond Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75039 |
| CCR unit | CCR Surface Impoundment |

| INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023 | |
|--|---|
| (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 embankments 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 WAP has a design operating water surface elevation of 328 feet MSL (plus freeboard). At the time of the 2023 annual inspection, the elevation of impounded water and CCR in the WAP was 326.4 feet MSL. The impounded fluid level has fluctuated between 327.3 and 326.0 feet MSL since the previous annual inspection. |
| b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 76,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Approximately 68,000,000 gallons (total impounded volume). Estimated 15,000 cubic yards of CCR. |

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023

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

(b)(2)(vi) Any appearances of an actual or potential structural 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 8/31/2023

(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.

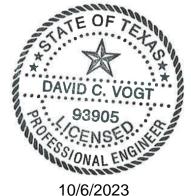
I, David C. Vogt, certify under penalty of law that the information submitted in this report was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the state of Texas. The information submitted, is to the best of my knowledge and belief, 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.

David C. Vogt, PE

Texas PE No. 93905, Expires: 03/31/2023

HDR Firm Registration No. F-754

Date: 10/6/2023



(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 | New Scrubber Pond Martin Lake Steam Electric Station Rusk County, Texas 75804 |
| Operator Name / Address | Luminant Generation Company, LLC 6555 Sierra Drive, Irving, TX 75039 |
| CCR unit | CCR Surface Impoundment |

| INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023 | |
|--|--|
| (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 embankments 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). The pond is currently drained and all CCR has been removed to retrofit a new liner. The impounded fluid level had a maximum elevation of 308.0 feet MSL since the previous annual inspection. |
| b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection | Approximately 65,000,000 gallons |
| (b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection. | Pond has been drained of water and all CCR removed to retrofit a new liner. Estimated 0 cubic yards of CCR. |

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 8/31/2023

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

(b)(2)(vi) Any appearances of an actual or potential structural 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 8/31/2023

(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, David C. Vogt, 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.

David C. Vogt, PE

Texas PE No. 93905, Expires: 03/31/2023

HDR Firm Registration No. F-754

Date: October 6, 2023



10/6/2023