

**2025 ANNUAL CCR UNIT INSPECTION REPORT
OAK GROVE STEAM ELECTRIC STATION
ASH LANDFILL 1**



ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER**30 TAC § 352.841(a) and 40 CFR § 257.84(b)**

(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	Ash Landfill 1 Oak Grove Steam Electric Station Robertson County, Texas 77837
Operator Name / Address	Oak Grove Management Company LLC 6555 Sierra Drive, Irving, TX 75039
CCR unit	CCR Landfill

INSPECTION REPORT 40 CFR § 257.84(b)(2)**Date of Inspection 9/3/2025**

(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 360,000 cubic yards of CCR placed in Ash Landfill 1 since the last inspection. Total estimated 15,810,000 cubic yards of CCR placed in the landfill since operation began.
(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.

30 TAC § 352.841(a) and 40 CFR § 257.84(b) - Annual inspection by a qualified professional engineer.

I, Brett DeVries, Ph.D., 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 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.



Brett DeVries, Ph.D., P.E.
Texas PE No. 128061, Expires: 9/30/2026
TBPE Registration No. F-3407
Date: 9/29/2025

Brett DeVries 9/29/25