2025 ANNUAL CCR UNIT INSPECTION REPORT
OAK GROVE STEAM ELECTRIC STATION
FGD PONDS

Luminant

ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER 30 TAC § 352.831(a) and 40 CFR § 257.83(b)	Rev. 7 – 9/29/2025
(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	FGD-A Pond 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 Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(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 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;	FGD-A pond has a maximum design operating water surface elevation of 448 feet MSL (plus freeboard). At the time of the 2025 annual inspection, the FGD-A pond had an impounded water depth of 448.3 feet. The impounded water level has fluctuated between 434.8 feet MSL and 449.3 since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 56,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 56,000,000 gallons total impounded, including an estimated 100,000 cubic yards of CCR at the time of inspection.

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 9/3/2025	
(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 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 9/3/2025	
(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, 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

ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER 30 TAC § 352.831(a) and 40 CFR § 257.83(b)	Rev. 7 – 9/29/2025
(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	FGD-B Pond 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 Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(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 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;	FGD-B pond has a maximum design operating water surface elevation of 429.5 feet MSL (plus freeboard). At the time of the 2025 annual inspection, the elevation of impounded water and CCR in FGD-B pond was approximately 429.6 feet MSL. The impounded water level has fluctuated between 426.8 and 431.1 feet MSL since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 34,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 34,000,000 gallons total impounded at the time of the onsite inspection.

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 9/3/2025	
(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 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 9/3/2025	
(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, 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

ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER 30 TAC § 352.831(a) and 40 CFR § 257.83(b)	Rev. 7 - 9/29/2025
(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	FGD-C Pond 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 Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(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 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	Depth gauge located within FGD-C pond to monitor the water surface elevation,
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;	FGD-C pond has a maximum design operating water surface elevation of 462 feet MSL (plus freeboard). At the time of the 2025 annual inspection, the elevation of impounded water and CCR in FGD-C pond was approximately 461.0 feet MSL. The impounded water level has fluctuated between 455.1 and 463.0 feet MSL since the previous annual inspection.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 71,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 66,500,000 gallons total impounded including an estimated 8,000 cubic yards of CCR were in the pond at the time of onsite inspection.

INSPECTION REPORT 40 CFR § 257.83(b)(2) Date of Inspection 9/3/2025	
(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 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 9/3/2025	
(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, 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