



December 31, 2020

Texas Commission on Environmental Quality
Industrial and Hazardous Waste Permits Section
MC-130
PO Box 13087
Austin, Texas 78711-3087

**RE: 2020 Annual CCR Unit Inspection Report - Big Brown Steam Electric Station –
Ash Disposal Area II**

On behalf of Falcon Development, LLC (CN605732817), ATON, LLC (ATON) is submitting this Annual CCR Unit Inspection Report of the Ash Disposal Area II at the Big Brown Steam Electric Station (BBSSES) (SWR 30080). The inspection was conducted on December 8, 2020.

Please contact me at (512) 566-6878 or at adam.kaiser@atonenv.com if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Adam J. Kaiser".

Adam J. Kaiser, P.E.
Senior Project Engineer

CC: Falcon Development LLC

ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER	
40 CFR § 257.84(b)	Rev. 3- 12/14/2017
<p>(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:</p> <p>(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.</p>	

SITE INFORMATION	
Site Name/Address:	Ash Disposal Area II Big Brown Steam Electric Station Freestone County, Texas 7504
Operator Name/Address:	Falcon Development, LLC 2275 Cassens Drive, Suite 118 Fenton, Missouri 63026
CCR Unit:	CCR Landfill

INSPECTION REPORT 40 CFR § 257.84(b)(2)	
Date of Inspection 1/22/2020	
(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 394,758 cubic yards of CCR have been placed in Ash Disposal Area II from 2015 through 2020.
(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.

40 CFR § 257.84(b) - Annual Inspection by a Qualified Professional Engineer

I, Adam J. Kaiser, 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.



Adam J. Kaiser, P.E.
Texas PE No 126387, Expires 3/31/2020



12/31/2020