



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 –
Bottom Ash Ponds**

On behalf of Falcon Development, LLC (CN605732817), ATON, LLC (ATON) is submitting this Annual CCR Unit Inspection Report of the Bottom Ash Ponds 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



ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER
40 CFR § 257.83(b) **Rev. 4- 11/15/2018**

(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:	North Bottom Ash Pond (NBAP) 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 Surface Impoundment

INSPECTION REPORT 40 CFR § 257.83(b)(2)
Date of Inspection 1/22/2020

(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.	In 2020, all the bottom ash was removed from the ponds and either the embankments will be breached to provide stormwater drainage, or the embankment and liner will be used as fill in the Ash Disposal Area 2.
(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 ponds were dewatered in 2020.

(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	NA
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	In 2020, all the bottom ash and ash waster was removed from the ponds.
(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	NA
(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.	In 2020, all the bottom ash and ash waster was removed from the ponds.

40 CFR § 257.83(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