



January 7, 2021

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 - Monticello Steam Electric Station –  
Bottom Ash Ponds**

On behalf of Golden Eagle Development, LLC (CN605736982), ATON, LLC (ATON) is submitting this Annual CCR Unit Inspection Report of the Bottom Ash Ponds at the Monticello Steam Electric Station (MOSES) (SWR 30081). The inspection was conducted on December 9, 2020.

Please contact me at (512) 566-6878 or at [adam.kaiser@atonenv.com](mailto: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: Golden Eagle Development



**ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER**  
**40 CFR § 257.83(b)** Rev. 4- 12/7/2018

(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:	Northeast Bottom Ash Pond (NE BAP) Monticello Steam Electric Station Titus County, Texas 75455
Operator Name/Address:	Golden Eagle 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 12/9/2020	
(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 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 NE BAP has a design operating water surface elevation of 384 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water in the NE BAP was well below the gauge. In the summer of 2020, the BAPs were pumped down to handle large rain events and prepare for closure in 2021. The water was pumped to the North Operating Pond. The impounded fluid level has fluctuated between <380 and 386 feet MSL since the previous annual inspection. With exception of approximately 3,000 cubic yards of CCR placed in the NE BAP as part of plant decommissioning, the volume of impounded CCR has not changed significantly since the previous annual inspection.

(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 28,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately <20,000,000 gallons (Total impounded volume). Estimated 140,000 cubic yards of CCR
(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.
(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.

**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



1/7/2021

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**40 CFR § 257.83(b)**

Rev. 4- 12/7/2018

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**SITE INFORMATION**

Site Name/Address:	West Bottom Ash Pond (West BAP) Monticello Steam Electric Station Titus County, Texas 75455
Operator Name/Address:	Golden Eagle 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 12/9/2020**

(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 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 West BAP has a design operating water surface elevation of 384 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water in the West BAP was well below the gauge. In the summer of 2020, the BAPs were pumped down to handle large rain events and prepare for closure in 2021. The water was pumped to the North Operating Pond. The impounded fluid level has fluctuated between <380 and 386 feet MSL since the previous annual inspection. With exception of approximately 5,000 cubic yards of CCR placed in the NE BAP as part of plant decommissioning, the volume of impounded CCR has not changed since the previous annual inspection.

(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 35,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately <30,000,000 gallons (Total impounded volume). Estimated 152,000 cubic yards of CCR.
(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.
(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.

**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.



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SITE INFORMATION	
Site Name/Address:	Southwest Bottom Ash Pond (SW BAP) Monticello Steam Electric Station Titus County, Texas 75455
Operator Name/Address:	Golden Eagle 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 12/9/2020	
(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 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 SW BAP has a design operating water surface elevation of 384 feet MSL (plus freeboard). At the time of the 2020 annual inspection, the elevation of impounded water in the SW BAP was well below the gauge. In the summer of 2020, the BAPs were pumped down to handle large rain events and prepare for closure in 2021. The water was pumped to the North Operating Pond. The impounded fluid level has fluctuated between <380 and 386 feet MSL since the previous annual inspection. The volume of impounded CCR has not change since the previous annual inspection, as the CCR is primarily managed in the Northeast and West BAPs.

(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection	Approximately 46,000,000 gallons
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately <40,000,000 gallons (Total impounded volume). Estimated 25,000 cubic yards of CCR
(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.
(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.

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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.



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