

January 27, 2022

**Environmental
Resources
Management
Southwest, Inc.**

Mr. Michael Malone
CPS Energy
145 Navarro Street
San Antonio, Texas 78205

Project No. 0352436

CityCentre Four
840 West Sam Houston Pkwy N.
Suite 600
Houston, Texas 77024
(281) 600-1000
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Subject: CCR Units – 2021 Annual Inspection and Fugitive Dust
Control Report
Calaveras Power Station
San Antonio, Texas



Dear Mr. Malone:

CPS Energy owns and operates the Calaveras Power Station which consists of two power plants [J.T. Deely (ceased operation) and J.K. Spruce] that are subject to regulation under Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) Subpart D (a.k.a. the CCR Rule). Environmental Resources Management Southwest, Inc. (ERM) conducted an inspection of the coal combustion residual (CCR) units at the Calaveras Power Station. Currently, CPS Energy operates three active CCR units. Although the J.T. Deely Power Plant ceased operation at the end of December 2018 and sluiced bottom ash is no longer being received at the inactive Bottom Ash Ponds (BAPs), the BAPs will continue to be inspected until the units have undergone closure. The CCR units at the Calaveras Power Station are described in Table 1.

Table 1. Calaveras Power Station CCR Unit Descriptions

Unit Name	Unit ID	Purpose of Unit
Fly Ash Landfill (a.k.a. 5-Year Landfill)	010	Receives fly ash, bottom ash, economizer ash, scrubber sludge from flue gas desulphurization ponds, and flue gas desulphurization gypsum (temporary storage).
Evaporation Pond	021	Receives boiler chemical cleaning waste and other authorized liquid wastes.
North Bottom Ash Pond (North BAP)	005	Formerly received sluiced bottom ash.
South Bottom Ash Pond (South BAP)	006	Formerly received sluiced bottom ash.
Sludge Recycle Holding (SRH) Pond (North and South)	026	Receives flue gas desulphurization scrubber sludge.

The annual inspection was conducted by Mr. Charles Johnson, P.E., on December 14, 2021. Photographs taken during the inspection are provided in Attachment 1. No issues were observed that indicated immediate stability or operational issues at the CCR units. Details of the observations made by Mr. Johnson are provided below.

Unit Descriptions

All units are built with above-grade earthen embankments reportedly composed of sandy clay and clayey sand fill. Some units have CCR ash used in the surface roadways of the features (e.g., Fly Ash Landfill and BAPs). Figure 1, provided in Attachment 2, shows the locations of each CCR unit. Dimensions of the CCR units were not measured during the annual inspection.

Based on a comparison of recent and historical aerial photographs dating back to 1995, no significant changes in the dimensions or geometry of the units were observed. Table 2 provides a summary of the unit dimensions. The dimensions presented below are approximate and are based on publically available imagery as well as on an assessment conducted by CDM Smith (June 2014).

Table 2: Calaveras Power Station CCR Unit Dimensions

Dimension	Fly Ash Landfill	Evaporation Pond	North BAP	South BAP	SRH Pond
Length (feet)	1,000	500	680-370 (a)	400	440
Width (feet)	950	400	460	680	330
Depth (feet)	32.5	22	12	12	8
Avg. Crest Width (feet)	20	20	15	15	15
Perimeter (feet)	4,000	1,800	2,100	2,200	1,550
Interior Slopes, H:V	3:1	3:1	2:1	2:1	3:1
Exterior Slopes, H:V	3:1	3:1	3:1	3:1	3:1
Total Area (acres)	21.8	4.5	6.0	7.0	3.5

(a) Length ranges from 680 to 370 feet along the southern and northern sides of the North BAP.

The Evaporation Pond is reportedly lined with 30-mil polyvinylchloride (PVC) geomembrane. There are no inlet or outlet structures to the Evaporation Pond. A four-inch polyethylene pipe is present in the eastern embankment and supplies water for equipment washout purposes within the Evaporation Pond area. Liquid from boiler chemical cleanouts and other authorized liquid wastes are trucked to the Evaporation Pond, and are allowed to evaporate. Periodically, dried material is removed from the Evaporation Pond and placed in the Fly Ash Landfill.

The North and South BAPs are reportedly lined with clay, but the thickness and hydraulic conductivity of the clay are unknown. Both BAPs have two discharge points. One 24-inch steel pipe in each BAP allows water to be returned to the plant for reuse. Both BAPs also have outlet structures consisting of a horizontal 12-inch steel discharge pipe at an approximate elevation of 489 feet MSL (bottom drain used to empty the pond), and a vertical 12-inch steel overflow pipe at an approximate of elevation 499 feet MSL (normal operation level pool drain). The outfall structure is in one corner of each BAP (northeast for North BAP and southeast for South BAP) and is partially surrounded by steel sheet piling. The sheet piling and pond berms create an opening for water to reach the discharge pipes. This opening is typically protected by floating sorbent booms. Water from these outlets discharges to Calaveras Lake through a TPDES permitted outfall. Sluiced bottom ash has not been received at the BAPs since the end of December 2018 and water is no longer present in the units.

The interior slopes of the SRH Pond are reportedly covered with 30-mil HDPE liner and a 6-inch thick concrete slab. The SRH Pond is delineated into a north side and south side by a concrete divider wall with a sluice gate that allows the two sides to be isolated from each other. Water is pumped from the SRH Pond to clarifiers via two 18-inch steel pipes. The SRH Pond had two eight-foot-wide concrete overflow chutes that discharged to the South BAP. These overflow chutes have been filled with road base/caliche as of the 2019 annual inspection since the BAPs are undergoing closure.

The Fly Ash Landfill is reportedly lined with a 30-mil HDPE liner covered with a 10-ounce geotextile and 12 inches of sand. The bottom of the Fly Ash Landfill slopes from west-to-east, from approximately 514 feet MSL to 503 feet MSL. The top berm is at an approximate elevation of 535.5 feet MSL, for a total landfill depth of approximately 32.5 feet at the deepest point. Storm water collects in the southeast corner of the Fly Ash Landfill and is allowed to settle. A water quality sample is collected and analyzed prior to discharge through a TPDES permitted outfall.

No electronic instrumentation is associated with the CCR units. Rebar rods, used by CPS Energy to monitor water levels, are present at the Evaporation Pond.

Unit History

The Evaporation Pond was originally constructed as a fly ash landfill. In 1990, a pond liner was installed. Then in 1996, the unit was converted from a landfill to an impoundment. Fly ash was placed in the landfill prior to it being used as an impoundment. The top of the Evaporation Pond is at an approximate elevation of 522 feet MSL and the bottom is at an approximate elevation of 500 feet MSL.

The North and South BAPs were constructed in 1977, and the SRH Pond was constructed in 1992. Embankments are reported to have been constructed of on-site material. The top of the SRH Pond embankments is at an approximate elevation of 500 feet MSL, and the bottom at an approximate elevation of 492 feet MSL. Up to a foot of ash and other material have been added to the roads on the top of the BAP embankments, making the top elevation approximately 501 feet MSL. The bottom of the BAPs is at an approximate elevation of 489 feet MSL.

The Fly Ash Landfill was constructed in 1992. Liner on the side slopes was originally not covered with a protective layer, and began to show signs of deterioration. Portions of the liner on the north and west side embankments were repaired in 2010 and all side slopes are currently covered with a protective layer of coarse CCR.

Except for the ceased operations at the BAPs, no other changes to unit operations or dimensions were reported to have occurred during the life of the units.

Structural Integrity

There is no reported historic evidence of structural instability in the CCR units.

Geotechnical properties of the foundation and abutment materials, on which the ponds were constructed, are provided in *Geotechnical Engineering Study for Ash Pond Berms – Spruce/Deely Generation Units, San Antonio, Texas* by Raba Kistner Consultants, Inc. (May 2014), and are summarized in *Assessment of Dam Safety of Coal Combustion Surface Impoundments Final Report* for the J.K. Spruce and J.T. Deely Power Plants by CDM Smith (June 2014).

As summarized in the CDM Smith report, embankment material is light clay (ASTM “CL”) with a clay fraction of approximately 45%, and an assumed liquid limit between 35 and 47. Foundation material for the BAPs and SRH Pond consists of sandy clay (ASTM “CL”) with a clay fraction between 50% and 60%, and a liquid limit of approximately 51; or clayey sand (ASTM “ML”) with a clay fraction of approximately 35%, and a liquid limit of approximately 33. Evaporation Pond material is similar, except the liquid limit for the foundation materials is approximately 55.

No information on the embankment and foundation materials were available for the Fly Ash Landfill, but foundation materials are anticipated to be similar to those of the Evaporation Pond based on the proximity of the units.

Annual Inspection Summary

Signage was present at each CCR unit and no issues were observed that presented an immediate threat to structural integrity of the CCR units.

Fly Ash Landfill

The Fly Ash Landfill was at approximately 41.5% of the approximate 900,000 cubic yard capacity based on calculations provided by CPS Energy. Approximately 4 to 6 acres of the Fly Ash Landfill interior were covered with discrete piles of ash, the largest piles approximately 20 feet in height.

Grass along the exterior embankment slopes was observed to be generally well maintained and no woody plants were observed. No significant rutting, erosion, animal burrows, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 4, 2021 through December 29, 2021 reported only the occasional need for mowing.

Since the 2020 annual inspection, there have been no noticeable changes in the geometry of the Fly Ash Landfill, or any other changes that appear likely to have affected the stability or operation of the Fly Ash Landfill.

Evaporation Pond

The Evaporation Pond had approximately 4 feet of freeboard available at the time of the inspection. This corresponds to approximately 2 feet below the top of the geomembrane liner as measured by a set of rebar rods recently installed within the Evaporation Pond by CPS Energy. Based on information provided by CPS Energy, accounting for accumulated solids, the Evaporation Pond had an available capacity of approximately 15% or 12 acre-feet, with approximately 70 acre-feet of water and CCR contained within the Evaporation Pond.

Grass along the exterior embankment slopes was observed to be generally well maintained and no woody plants were observed. No significant rutting, erosion, animal burrows, seepage, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 4, 2021 through December 28, 2021 reported only the occasional need for mowing.

Since the 2020 annual inspection, there have been no noticeable changes in the geometry of the Evaporation Pond, or any other changes that appear likely to have affected the stability of the Evaporation Pond. Based on information provided by CPS Energy, the maximum depth of the water and CCR in the Evaporation Pond during 2020 was 19.5 feet, which corresponds to 2.5 feet of freeboard and a volume of approximately 72 acre-feet. The minimum amount of CCR and water contained was reported to be 80% of the capacity, comprised primarily of accumulated solids and a minimal volume of water, which corresponds to a volume of approximately 66 acre-feet.

North Bottom Ash Pond

The inactive North BAP was offline, drained, and substantially empty of water and CCR at the time of the inspection.

Grass along the western and eastern exterior embankment slopes was observed to be generally well maintained. Some woody plant growth was observed on the north exterior embankment slope, some young trees were observed in the unit interior, and some minor erosion was observed on the north interior embankment slope. Corrosion was observed on the overflow discharge pipe and nearby sheet piling. No significant rutting, erosion, animal burrows, seepage, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 4, 2021 through December 28, 2021 reported the occasional need for mowing, and young trees starting to grow in the interior now that the unit is no longer in operation. These items should be addressed and maintained until the unit is closed.

Since the 2020 annual inspection, there have been no noticeable changes in the geometry of the North BAP, or any other changes that appear likely to have affected the stability of the North BAP. Based on information provided by CPS Energy, the North BAP was substantially empty of water and CCR for all of 2021.

South Bottom Ash Pond

The inactive South BAP was offline, drained, and substantially empty of water and CCR at the time of the inspection.

Grass along the external embankment slopes was observed to be generally well maintained and no woody plants were observed on exterior embankments. Some young trees were observed in the unit interior. Corrosion was observed on the overflow discharge pipe and nearby sheet piling. No significant rutting, erosion, animal burrows, seepage, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 4, 2021 through December 28, 2021 reported the occasional need for mowing, and young trees starting to grow in the interior now that the unit is no longer in operation. These items should be addressed and maintained until the unit is closed.

Since the 2020 annual inspection, there have been no noticeable changes in the geometry of the South BAP, or any other changes that appear likely to have affected the stability of the South BAP. Based on information provided by CPS Energy, the South BAP was substantially empty of water and CCR for all of 2021.

Sludge Recycle Holding (SRH) Pond

The SRH Pond contained water at the time of the inspection. Only the south side of the pond was in use during the inspection and appeared to have approximately two feet of freeboard. The north side of the pond was not in use and appeared to be substantially empty of CCR solids and water. This corresponds to a combined available capacity (including freeboard) of approximately 12 acre-feet, with approximately 12 acre-feet of water and CCR contained within the SRH Pond.

Grass along the external embankment slopes was observed to be generally well maintained. Some young trees were observed in the unit interior. No significant rutting, erosion, animal burrows, seepage, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 4, 2021 through December 12, 2021 reported the occasional need for mowing, one occurrence of an animal burrow, and one occurrence of young trees starting to grow on the embankments. These items and the young trees in the unit interior should be addressed and maintained by CPS Energy in 2022.

Since the 2020 annual inspection, there have been no noticeable changes in the geometry of the SRH Pond, or any other changes that appear likely to have affected the stability of the SRH Pond. Based on information provided by CPS Energy, the maximum depth of the water and CCR in the SRH Pond during 2021 was 6 feet, which corresponds to two feet of freeboard and a volume of approximately 17 acre-ft. The minimum depth was 0 feet (one side of the pond was empty while the other was in operation), which corresponds to a volume of approximately 8 acre-feet.

Fugitive Dust Control

ERM assessed compliance with the *Fugitive Dust Control Plan (FDCP)* in conjunction with the annual inspection. CPS Energy reported no citizen complaints regarding fugitive dust emissions from the CCR units or the handling equipment. Paved roads are reportedly swept twice per month, which is more frequent than the minimum monthly requirement specified in the FDCP. Haul roads were reportedly watered daily each morning and additionally as needed when handling CCR. Releases from conveyors are monitored and cleaned as needed. Visual observations are made quarterly at each CCR unit.

Emission observations are recorded on a standard opacity form utilized for non-CCR inspections and not on the form provided in the FDCP. The standard opacity form contains more detailed information than the FDCP form. Emissions were observed and recorded during various operations (i.e., truck loading at ash silos/dust collectors, ash dumping at landfill) associated with the CCR units and handling equipment. Reported opacity observations were within the limits of the New Source Performance Standard.

ERM appreciates the opportunity to work with CPS Energy on this project. Should you have any questions, please contact us at 281-600-1000.

Sincerely,

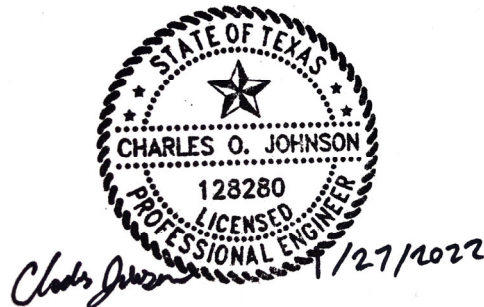
Environmental Resources Management Southwest, Inc.


Charles Johnson, P.E.

cc: Gregg Tieken, CPS Energy

Attachments:

- Attachment 1 Photographs
- Attachment 2 Figure 1



Photographs
Attachment 1

Environmental Resources Management Southwest, Inc.
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Photograph: 1 Fly Ash Landfill – standing on northwest corner – facing west.
Photo taken 12/14/2021.



Photograph: 2 Fly Ash Landfill – standing on northwest corner – facing west.
Photo taken 12/14/2021.



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Photograph: 3 Fly Ash Landfill – standing on northwest corner – facing south.
Photo taken 12/14/2021.



Photograph: 4 Fly Ash Landfill – standing on northwest corner – facing south.
Photo taken 12/14/2021.



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Photograph: 5 Fly Ash Landfill – standing on northeast corner – facing south.
Photo taken 12/14/2021.



Photograph: 6 Fly Ash Landfill – standing on northeast corner – facing south.
Photo taken 12/14/2021.



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Photograph: 7 Fly Ash Landfill – standing on southeast corner – facing west. Radial stacker located in southwest corner and stormwater discharge piping in southeast corner of landfill. Photo taken 12/14/2021.



Photograph: 8 Fly Ash Landfill – standing on southeast corner – facing west. Radial stacker located in southwest corner and stormwater discharge piping in southeast corner of landfill. Photo taken 12/14/2021.



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Photograph: 9 Fly Ash Landfill – standing on southwest corner – facing east.
Photo taken 12/14/2021.



Photograph: 10 Fly Ash Landfill – standing on southwest corner – facing east.
Photo taken 12/14/2021.



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Photograph: 11 Evaporation Pond – standing on the northeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 12 Evaporation Pond – standing on the northeast corner – facing south.
Photo taken 12/14/2021.



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Photograph: 13 Evaporation Pond – standing on the northeast corner – facing south.
Photo taken 12/14/2021.



Photograph: 14 Evaporation Pond – standing on the northeast corner – facing west.
Photo taken 12/14/2021.



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Photograph: 15 Evaporation Pond – standing on the southwest corner – facing north.
Photo taken 12/14/2021.



Photograph: 16 Evaporation Pond – standing on the southwest corner – facing east.
Photo taken 12/14/2021.



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Photograph: 17 North Bottom Ash Pond – standing on northwest corner – facing southwest. Photo taken 12/14/2021.



Photograph: 18 North Bottom Ash Pond – standing on northwest corner – facing east. Photo taken 12/14/2021.



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Photograph: 19 North Bottom Ash Pond – standing on northwest corner – facing east.
Photo taken 12/14/2021.



Photograph: 20 North Bottom Ash Pond – standing on northwest corner – facing southwest. Photo taken 12/14/2021.



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Photograph: 21 North Bottom Ash Pond – standing on northeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 22 North Bottom Ash Pond – standing on northeast corner – facing south.
Photo taken 12/14/2021.



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Photograph: 23 North Bottom Ash Pond – standing on southeast corner – facing north.
Photo taken 12/14/2021.



Photograph: 24 North Bottom Ash Pond – standing on southeast corner – facing west.
Photo taken 12/14/2021.



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Photograph: 25 South Bottom Ash Pond – standing on northeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 26 South Bottom Ash Pond – standing on northeast corner – facing south.
Photo taken 12/14/2021.



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Photograph: 27 South Bottom Ash Pond – standing on northeast corner – facing south.
Photo taken 12/14/2021.



Photograph: 28 South Bottom Ash Pond – standing on southeast corner – facing north.
Photo taken 12/14/2021.



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Photograph: 29 South Bottom Ash Pond – standing on southeast corner – facing northwest. Photo taken 12/14/2021.



Photograph: 30 South Bottom Ash Pond – standing on southeast corner – facing west. Photo taken 12/14/2021.



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Photograph: 31 South Bottom Ash Pond – standing on southeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 32 South Bottom Ash Pond – standing on southwest corner – facing east.
Photo taken 12/14/2021.



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Photograph: 33 South SRH Pond – standing on the southeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 34 South SRH Pond – standing on the southeast corner – facing west.
Photo taken 12/14/2021.



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Photograph: 35 South SRH Pond – standing on the southeast corner – facing north.
Photo taken 12/14/2021.



Photograph: 36 South SRH Pond – standing on the east berm – spillway structure.
Photo taken 12/14/2021.



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Photograph: 37 North SRH Pond – standing on the southeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 38 North SRH Pond – standing on the southeast corner – facing northwest.
Photo taken 12/14/2021.



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Photograph: 39 North SRH Pond – standing on the northeast corner – facing west.
Photo taken 12/14/2021.



Photograph: 40 North SRH Pond – standing on the northeast corner – facing west.
Photo taken 12/14/2021.



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Photograph: 41 North SRH Pond – standing on the northwest corner – facing south.
Photo taken 12/14/2021.



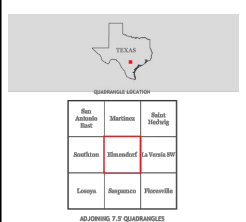
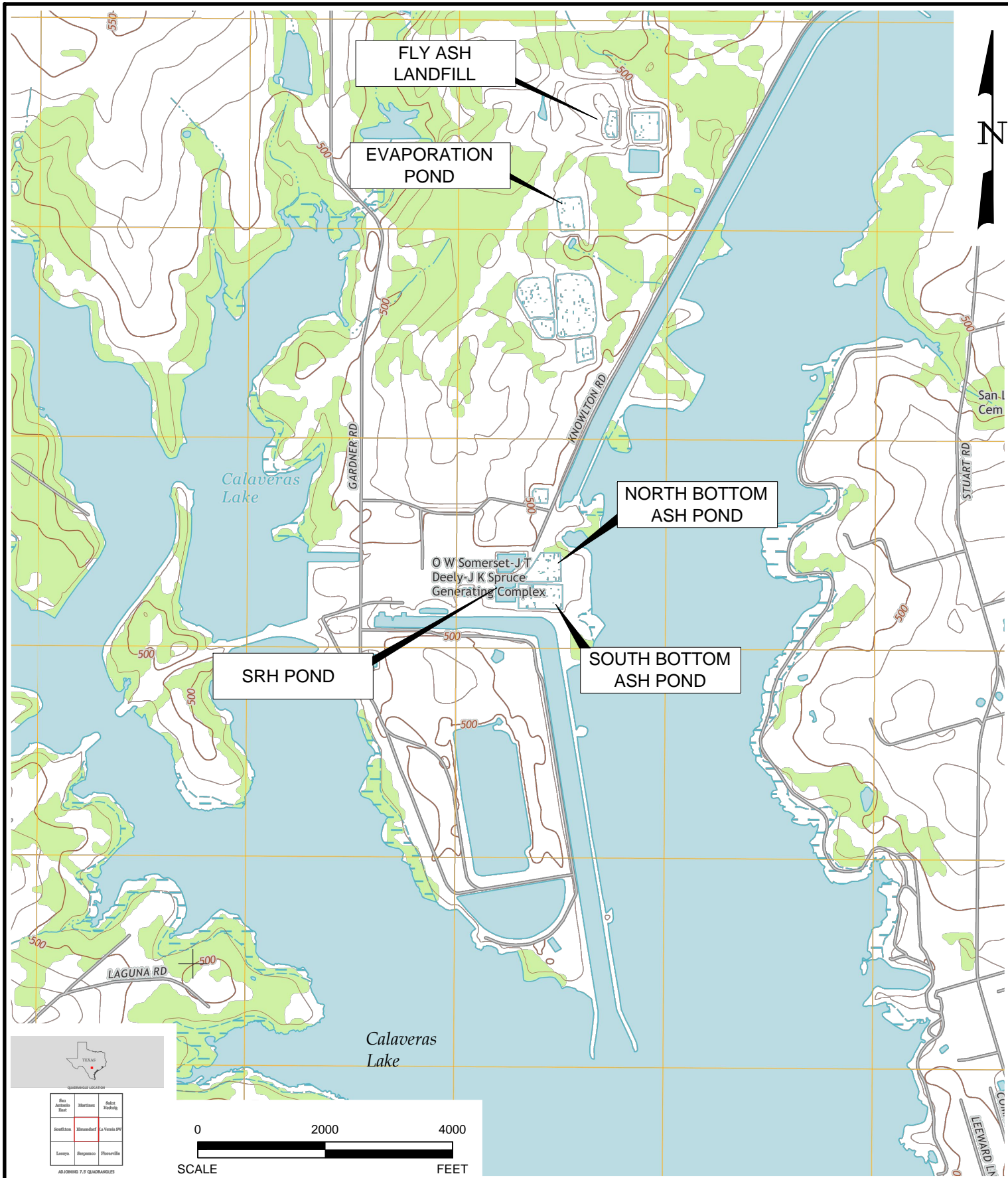
Photograph: 42 South SRH Pond – standing on the southwest corner – facing north.
Photo taken 12/14/2021.



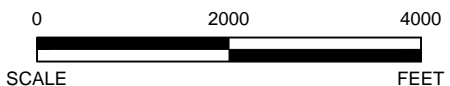
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Figure 1
Attachment 2

Environmental Resources Management Southwest, Inc.
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Houston, Texas 77024
(281) 600-1000



San Antonio	Martinez	Ball
Bourbon	Blumberg	La Verna
Lopez	Beggs	Phonville



Environmental Resources Management

FIGURE 1
CCR Unit Locations
Calaveras Power Station
San Antonio, Texas



DESIGN: CC	DRAWN: RLM	CHKD.: CC
DATE: 1/5/2016	SCALE: AS SHOWN	REV.:

W.O. NO.: H:\DWG\A16\0328985A01.dwg, 1/5/2016 1:28:34 PM

ERM-Southwest, Inc. TX PE Firm No. 2393