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J.K. SPRUCE POWER PLANT -

PLANT DRAINS POND -

Liner Completion Documentation

July 2023
AECOM Project 60566130

Delivering a better world

Prepared for:

CPS Energy Calaveras Power Station
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J.K. SPRUCE POWER PLANT
LINER CONSTRUCTION COMPLETION DOCUMENTATION
TAC Title 30, Part 1, § 352, Subchapter F, § 352.721
PLANT DRAINS POND (PDP)

Liner Construction Completion Criteria	Liner Construction Documentation
30 TAC §352.721 Liner Design Criteria for New and Lateral Expansions of Coal Combustion Residuals Surface Impoundments. *The commission adopts by reference 40 Code of Federal Regulations §257.72 (Liner design criteria for new CCR surface impoundments and any lateral expansion of a CCR surface impoundment) as amended through the April 17, 2015, issue of the Federal Register (80 FR 21301).* ***40 CFR § 257.72 Liner design criteria for new CCR surface impoundments and any lateral expansion of a CCR surface impoundment.*** § 257.72 (d) Upon completion, the owner or operator must obtain certification from a qualified professional engineer that the composite liner or if applicable, the alternative composite liner has been constructed in accordance with the requirements of this section.	Texas Administrative Code adopts by reference 40 CFR § 257.72. 40 CFR § 257.72 allows for a new surface impoundment to be constructed with a composite liner that meets the requirements of 40 CFR § 257.70 (b) or (c). The Plant Drains Pond (PDP) is constructed with an alternative composite liner that meets all the requirements of § 257.72: 1. *"§ 257.72(a) New CCR surface impoundments and lateral expansions of existing and new CCR surface impoundments must be designed, constructed, operated, and maintained with either a composite liner or an alternative composite liner that meets the requirements of § 257.70(b) or (c)."* In a separate certification dated June 28, 2022, a qualified professional engineer certified that the design of the PDP complies with the requirements. of § 257.70(c). By this certification, and on the basis of reviewed quality control and assurance records and direct participation in the construction as engineer of record, a qualified professional engineer certifies that the impoundment and alternative composite liner have been constructed in accordance with the previously-certified design and with the requirements of § 257.70(c) 2. *"§ 257.72(b) Any liner specified in this section must be installed to cover all surrounding earth likely to be in contact with CCR. Dikes shall not be constructed on top of the composite liner."* The PDP was installed with an alternative composite liner that covers the entire surface area of the impoundment and extends beyond the top of the perimeter embankments/dikes into an anchor trench. No dikes are constructed on top of the composite liner. 3. *"§ 257.72(c) Prior to construction of the CCR surface impoundment or any lateral expansion of a CCR surface impoundment, the owner or operator must obtain certification from a qualified professional engineer that the design of the composite liner or, if applicable, the design of an alternative composite liner complies with the requirements of this section.* As stated in Item 1, a qualified professional engineer prepared a certification dated June 28, 2022, that the design of the PDP complies with the requirements of § 257.72. As summarized above, the new PDP has been constructed in accordance with all the requirements of § 257.72(a), § 257.72(b), § 257.72(c), and § 257.72(d).

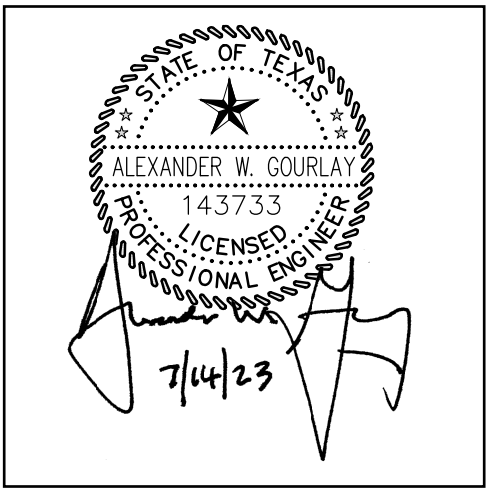
Certification Statement 30 TAC §352.721 and 40 CFR § 257.72(d) – Liner Construction Completion for a New CCR Surface Impoundment

CCR Unit: CPS Energy; Spruce Plant; Plant Drains Pond

I, Alexander W. Gourlay, being a Registered Professional Engineer in good standing in the State of Texas, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the alternative composite liner has been constructed in accordance with the requirements of 40 CFR § 257.72.

Alexander. W Gourlay, P.E.
Printed Name

July 14, 2023
Date



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