



June 26, 2023

Subject: Hazard Potential Classification Assessment for Existing CCR Surface Impoundments
– Update

Calaveras Power Station
San Antonio, Texas

To File:

The purpose of this memorandum is to document the hazard potential classification of the existing Coal Combustion Residual (CCR) surface impoundments at the CPS Energy Calaveras Power Station and to comply with Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) Subpart D (a.k.a the CCR Rule).

CPS Energy owns and operates the Calaveras Power Station, which is located in unincorporated Bexar County, Texas, approximately 13 miles southeast of San Antonio. Currently, CPS Energy operates the following CCR surface impoundment at the Power Station:

- Sludge Recycle Holding (SRH) Pond (separated into the north pond and south pond by a concrete dividing wall)

The following additional CCR surface impoundment is currently being constructed and will become operational by September 2023:

- Plant Drains Pond (PDP)

CPS Energy formerly operated three CCR surface impoundments at the Power Station:

- North Bottom Ash Pond (BAP)
- South BAP
- Evaporation Pond (EP)

The J.T. Deely Power Plant, located at the Calaveras Power Station, ceased operation at the end of December 2018 and the North and South BAPs have not received CCR (sluiced bottom ash) or non-CCR waste since that time. The EP ceased operation in September 2022 and has not received CCR or non-CCR waste since that time.

All the surface impoundments are constructed as elevated diked structures. The SRH Pond, located adjacent to the Power Plants, receives CCR and non-CCR flows from various sources within the J.K. Spruce Plant and all flows are co-mingled in the SRH Pond. The SRH Pond shares a common embankment with the North and South BAPs. The PDP, located approximately 2,000 feet north of the Power Plants, will receive CCR and non-CCR flows from various sources within the J.K. Spruce Plant and all flows will be co-mingled in the PDP. The North and South BAPs share a common embankment that separates the BAPs and are immediately east and share an embankment with the SRH Pond. The BAPs have been dewatered and are currently undergoing closure. The EP, located approximately 6,000 feet north of the Power Plants, received non-CCR flows (industrial wastestreams) that are trucked to the EP from the J.K. Spruce Plant and from other CPS Energy power generation facilities. While these flows are not considered CCR, the EP was originally constructed as a fly ash landfill in 1990, and then converted to a fly ash impoundment in 1996. The EP is currently undergoing closure and the waters within the EP are being allowed to evaporate.

40 CFR §257.73 requires that the owner and/or operator of an existing CCR impoundment conduct an initial and periodic hazard potential classification assessment. The initial assessment had to be performed and was performed prior to October 17, 2016. The periodic assessment had to be performed and was performed prior to October 17, 2021 (every five years). A hazard potential assessment summary for each impoundment is described in the remainder of this document. The assessment summaries for the SRH Pond, BAPs, and EP are based on reports prepared for the USEPA by CDM Smith in June 2014, field observations, and annual inspection reports prepared in 2015 through 2022. The assessment summary for the PDP is based on drawings prepared by AECOM in May and June 2022 and field observations.

The SRH Pond has an approximate storage capacity of 28 acre-feet, which results in the embankments not qualifying as a dam according to the US Army Corps of Engineers (USACE) Guidelines for Safety Inspections of Dams (1979). The recommended Hazard Ranking was determined to be "Significant Hazard" due to possible failure damaging the power plant infrastructure, operations and utilities. As pointed out in the CDM Smith report, "loss of human life is not anticipated".

The North and South BAPs have an approximate storage capacity of 72 and 84 acre-feet respectively, which results in the embankments being classified as "small" dams according to the USACE Guidelines for Safety Inspections of Dams. The recommended Hazard Ranking was determined to be "Significant Hazard" due to possible failure damaging the power plant infrastructure, operations and utilities. As pointed out in the CDM Smith report, "loss of human life is not anticipated". Since the BAPs have ceased operation and have been dewatered, that classification is no longer applicable.

The EP Pond has an approximate storage capacity of 99 acre-feet, which results in the embankments being classified as a "small" dam according to the USACE Guidelines for Safety Inspections of Dams. The recommended Hazard Ranking was determined to be "Low Hazard" due to low economic and/or environmental losses. The EP is located approximately 6,000 feet north of the Power Plants, therefore damage to the power plant infrastructure, operations and utilities is not anticipated. As pointed out in the CDM Smith report, "loss of human life is not anticipated". Although the EP has ceased operation and the water is currently evaporating, some waters remain within the EP so that classification is still applicable.

The PDP has an approximate storage capacity of 14 acre-feet, which results in the embankments not qualifying as a dam according to the USACE Guidelines for Safety Inspections of Dams. The recommended Hazard Ranking was determined by CPS Energy to be "Significant Hazard" due to possible environmental damage to Calaveras Lake. The PDP is located approximately 2,000 feet north of the Power Plants, therefore damage to the power plant infrastructure, operations and utilities is not anticipated and loss of human life is not anticipated.

Based on the review of CDM Smith reports, field observations, and annual inspection reports prepared in 2015 through 2022, CPS Energy designates the SRH Pond as a "Significant Hazard" and based on the review of AECOM drawings and field observations, CPS Energy designates the PDP as a "Significant Hazard". Since the BAPs have been dewatered and are not being operated as surface impoundments/dams, a "Significant Hazard" classification no longer applicable. Although the EP is not being operated as a surface impoundment/dam, a "Low Hazard" classification is still applicable.



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