Environmental Resources Management

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October 14, 2016

Mr. Michael Malone
CPS Energy
145 Navarro, Mail Drop 100406
San Antonio, Texas 78296

Project No. 0352436

Subject: Run-on/Run-off Control Plan
Calaveras Power Station
San Antonio, Texas

Dear Mr. Malone:

Environmental Resources Management Southwest, Inc. (ERM) is pleased to provide this Run-on/Run-off Control Plan for the Calaveras Power Station, to assist CPS Energy in complying with Title 40, Code of Federal Regulations, Part 257 (40 CFR §257), Subpart D Coal Combustion Residual (CCR) Rules.

The Calaveras Power Station has a single active Coal Combustion Residual (CCR) Fly Ash Landfill. The Landfill is of bermed construction with a top elevation of approximately 535.5 feet Mean Sea Level (MSL). Based on topographic maps of the surrounding area, the original pre-construction ground surface is approximately 525 feet MSL at the highest point (northwest corner), dropping to 500 feet MSL at the southeast corner. Therefore, the lowest point on the berm is approximately 10 feet above the surrounding ground surface. The Landfill has a single active area, with no closed portions and no interior berms or other physical divisions of the Landfill.

40 CFR §257.81(a)(1) requires that CCR landfills be designed to prevent flow onto the active portion of the CCR unit during the peak discharge from the 25-year, 24-hour storm. Because the entire unit is surrounded by berms raised at least 10 feet above surrounding ground surface, no storm water run-on can enter the active area.

Because the Landfill is an elevated bermed structure, the drainage area is limited to that which falls directly onto the interior footprint of the unit. The interior of the Landfill slopes from an elevation of 514 feet MSL in the northwest corner, to 503 feet MSL in the southeast. The top of the berms are therefore a minimum of 21.5 feet above the interior of the Landfill. The 25-year, 24-hour design storm rainfall for the area is approximately 7.8 inches, as described in "*Technical Paper No. 40, Rainfall Frequency Atlas of the United States*", published by the US Department of Agriculture (TP-40). As required by 40 CFR §257.81(a)(2), the berms have sufficient capacity to collect and control the design storm.

Storm water collects in the southeast corner of the Landfill and is allowed to settle. A water quality sample is collected and analyzed prior to discharge through a TPDES permitted outfall. The permitting via TPDES meets the requirements of 40 CFR §257.81(b).

Based on our evaluation of the available information for the Landfill, this Run-on/Run-off Control Plan meets the requirements of 40 CFR §257.81.

Sincerely,

Environmental Resources Management

Chris Cunningham, P.E.