



27 October 2021

Mr. Michael Malone
CPS Energy
500 McCullough Avenue
San Antonio, Texas 78215

Project No: 0352436
Subject: Run-on/Run-off Control Plan – 5-Year Update
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 System Plan (ROROCSP) for the Calaveras Power Station to assist CPS Energy in complying with Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) [aka. the Coal Combustion Residual (CCR) Rule]. This ROROCSP is the 5-year update required under 40 CFR §257.81 Run-On and Run-Off Controls for CCR Landfills.

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 landfill at the Power Station:

■ Fly Ash Landfill (FAL)

The FAL 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 FAL has a single active area, with no closed portions and no interior berms or other physical divisions.

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 FAL 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 FAL is an elevated bermed structure, the drainage area is limited to the area that receives direct rainfall within the interior footprint of the unit. The interior of the FAL 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 FAL. The 25-year, 24-hour design storm rainfall for the area is approximately 8.1 inches, according to the National Oceanic and Atmospheric Administration (NOAA) Atlas 14, Volume 11: Precipitation-Frequency Atlas of the United States and obtained from the Precipitation Frequency Data Server (PFDS).

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 FAL and is allowed to settle. A water quality sample is collected and analyzed prior to storm water being discharged through a Texas Pollutant Discharge Elimination System (TPDES) permitted outfall. The analysis and permitting via TPDES meet the requirements of 40 CFR §257.81(b).

Based on our evaluation of the available information for the FAL, this ROROCSP meets the requirements of 40 CFR §257.81.

Sincerely,

Environmental Resources Management Southwest, Inc.



Charles Johnson, P.E.

