



**CORRESPONDENCE COVER SHEET  
WASTE PERMITS DIVISION  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Date: 22 January 2026

Facility Name: Calaveras Plant Site

Permit or Registration No.: CCR102

Nature of Correspondence:

- Initial/New  
 Response/Revision\*

\*If Response/Revision, please provide previous TCEQ Tracking No.:

(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

This cover sheet should accompany all correspondences submitted to the Waste Permits Division and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence being submitted. For questions regarding this form, please contact the Waste Permits Division at (512) 239-2335.

**Table 1 - Municipal Solid Waste**

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New Notification	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate SRC Demonstration
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Statistical Evaluation
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> Subchapter T Workplan	
<input type="checkbox"/> Other:	

**Table 2 - Industrial & Hazardous Waste**

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CfPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Extension Request
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> 335.6 Notification	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Other:	<input type="checkbox"/> Waste Minimization Report
	<input checked="" type="checkbox"/> Other: Annual Inspection and Fugitive Dust Control Report - CCR Units

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

**DATE**  
January 22, 2026

**SUBJECT**  
CCR Units – 2025 Annual Inspection and  
Fugitive Dust Control Report  
Calaveras Power Station  
San Antonio, Texas

**REFERENCE**  
0772777

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 Federal CCR Rule) and Title 30, Texas Administrative Code, Chapter 352 (30 TAC §352), Subchapter H (a.k.a. the Texas CCR Rule), collectively referred to as the CCR Rules. The CCR Rules require an annual inspection of coal combustion residual (CCR) landfills and surface impoundments by a qualified professional engineer. Environmental Resources Management Southwest, Inc. (ERM) conducted the inspection of the CCR units at the Calaveras Power Station on November 10, 2025. This *Annual Inspection and Fugitive Dust Control Report* (Report) provides a summary of the CCR units inspected, results of the annual inspection, and an assessment of the fugitive dust control at the Calaveras Power Station.

## 1. FACILITY SUMMARY

Currently, two CCR units [Fly Ash Landfill (FAL) and Plant Drains Pond (PDP)] are in operation and four CCR units [North and South Bottom Ash Ponds (BAPs), Evaporation Pond (EP) and Sludge Recycle Holding Pond (SRHP)] are undergoing closure. Although CCR and non-CCR wastes are no longer being received at the inactive BAPs, EP, and SRHP, these CCR units will continue to be inspected until the units have completed closure. The CCR units at the Calaveras Power Station are described in Table 1.

**TABLE 1. CALAVERAS POWER STATION CCR UNIT DESCRIPTIONS**

<b>Unit Name</b>	<b>Unit ID</b>	<b>Purpose of Unit</b>
Fly Ash Landfill (FAL) (a.k.a. 5-Year Landfill)	010	Receives fly ash, bottom ash, economizer ash, scrubber sludge from flue gas desulphurization (FGD) ponds, and flue gas desulphurization gypsum (temporary storage).
Evaporation Pond (EP)	021	Formerly received 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 Pond (SRHP)	026	Formerly received FGD scrubber sludge.
Plant Drains Pond (PDP)	036	Receives FGD scrubber sludge, inflows from plant discharges, and direct precipitation.

The annual inspection was conducted by Mr. Charles Johnson, P.E. (Texas), on November 10, 2025. 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., FAL 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.

Since last year's Report, no new CCR units have been constructed and no CCR units have completed closure.

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

**TABLE 2. CALAVERAS POWER STATION CCR UNIT DIMENSIONS**

Dimension	FAL	EP	North BAP	South BAP	SRHP	PDP
Length (feet)	1,000	535	500	395	414	435
Width (feet)	950	404	392-702 (a)	702	343	115
Depth (feet)	31.5	23	11	11	7.5	7.9
Avg. Crest Width (feet)	15	20	15	15	15	20
Perimeter (feet)	3,845	1,878	2,215	2,194	1,514	1,360
Interior Slopes, H:V	3:1	3:1	2:1	2:1	3:1	3.5:1
Exterior Slopes, H:V	3:1	3:1	3:1	3:1	3:1	3.5:1
Total Area (acres)	20.3	4.85	6.0	6.4	3.2	3.9

(a) Width ranges from 392 to 702 feet along the southern and northern sides of the North BAP.

The FAL is reportedly lined with a 30-mil HDPE liner covered with a 10-ounce geotextile and 12 inches of sand. The bottom of the FAL slopes from west-to-east, from approximately 515 feet MSL to 504 feet MSL. The top berm is at an approximate elevation of 535.5 feet MSL, for a total landfill depth of approximately 31.5 feet at the deepest point. Stormwater collects in the southeast corner of the FAL and is allowed to settle. A water quality sample is collected and analyzed prior to discharge through a TPDES permitted outfall.

The EP is reportedly lined with 30-mil polyvinylchloride (PVC) geomembrane. The top of the EP is at an approximate elevation of 522 feet MSL and the bottom is at an approximate elevation of 500 feet MSL. There are no inlet or outlet structures to the EP. A four-inch polyethylene pipe is present in the eastern embankment and supplies water for equipment washout purposes within the EP area. Liquid from boiler chemical cleanouts and other authorized liquid wastes were trucked to the EP and allowed to evaporate. Periodically, dried material was removed from the EP and placed in the FAL. CCR and non-CCR wastes have not been received at the EP since September 2022 and no free surface water was present in this CCR unit at the time of the annual inspection.

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 elevation of 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. The outfall structures were in the process of being removed as part of the unit closures at the time of the annual inspection. 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 free surface water was not present in these CCR units at the time of the annual inspection.

The interior slopes of the SRHP are reportedly covered with 30-mil HDPE liner and a 6-inch thick concrete slab. The top of the SRHP embankments is at an approximate elevation of 500 feet MSL, and the bottom at an approximate elevation of 492 feet MSL. The SRHP is delineated into a north side and south side by a concrete divider wall with a sluice gate that allowed the two sides to be isolated from each other. Historically, water was pumped from the SRHP to clarifiers via two 18-inch steel pipes. The SRHP 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. CCR and non-CCR wastes have not been received at the SRHP since October 2023 and only minor amounts of water was present in this CCR unit at the time of the annual inspection.

The PDP liner design consists of a composite liner. The upper component consists of a 60-mil thick high density polyethene (HDPE) geomembrane liner. The lower component consists of a geosynthetic clay liner (GCL). The HDPE geomembrane was installed in contact with the lower GCL liner. The reinforced concrete top layer covers the bottom of the PDP and was designed to protect the geomembrane liner during removal of solids. The PDP embankments have a 3.5:1 slope and a width of 20 feet at the crown. The bottoms of the west and east cells of the PDP range from 508.17 to 507.11 feet MSL and top of pond berm is at an approximate elevation of 515.00 feet MSL, for a total depth of 7.9 feet at the deepest point. The maximum normal operating water surface elevation is set at 512.8 feet msl, providing 2.0 feet of freeboard. The PDP was designed to receive nonhazardous wastewater, treated to reduce the total suspended solids (TSS) which is then recycled to the FGD system or discharged through a permitted outfall. The PDP was designed to replace operational features of the SRHP and also receive inflows from plant discharges and direct precipitation. The PDP includes a separator wall, sump to collect supernatant water, and clarifiers to reduce the TSS in the water 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 EP. Staff gauges are present in both PDP cells to monitor water levels.

## Unit History

The FAL 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.

The EP 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 North and South BAPs were constructed in 1977, and the SRHP was constructed in 1992. Embankments are reported to have been constructed of on-site material. Up to a foot of ash and other material have been added to the roads on the top of the BAPs embankments.

Construction of the PDP was completed in October 2023. The PDP was designed to replace operational features of the SRHP and also receive inflows from plant discharges and direct precipitation.

Except for the ceased operations at the BAPs, EP, and SRHP; ongoing closure activities at the BAPs; and construction of the PDP, no other changes to unit operations or dimensions were reported to have occurred during the life of the CCR units.

## 2. 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 SRHP 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. EP material is similar, except the liquid limit for the foundation materials is approximately 55.

Geotechnical properties of the existing soil conditions, foundation, and abutment materials, on which the PDP cells were constructed, are provided in the *Geotechnical Engineering Study J.K. Spruce-Calaveras Lake Power Plant Proposed New Coal Combustion Residual Ponds, San Antonio, Texas* by Raba Kistner Consultants, Inc. (February 2018). According to that study, the soils underlying the PDP are generally characterized by approximately 7 feet to 15 feet of consolidated material (sands, silts, and low to medium plasticity clays),

underlain by a clayey/silty sand to poorly-sorted sand (groundwater bearing unit) that is at least 27 feet thick, but may be greater than 40 feet thick.

No information on the embankment and foundation materials were available for the FAL, but foundation materials are anticipated to be similar to those of the EP based on the proximity of the CCR units.

### 3. 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 FAL was at approximately 63% of the approximate 900,000 cubic yard capacity based on calculations provided by CPS Energy. Approximately 4 to 6 acres of the FAL interior were covered with discrete piles of ash, scrubber sludge, and soil/bottom ash excavated from the BAPs, the largest piles approximately 16 to 20 feet in height.

Grass along the exterior embankment slopes of the FAL had some bare spots, which could be due to lack of rain in recent months; grass may naturally return with more moisture and warmer weather. Otherwise, grass along the other exterior embankment slopes was observed to be generally well maintained and no woody plants were observed. No significant rutting, erosion, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 3, 2025 through December 30, 2025 reported minor bare spots on the exterior berm side slopes and otherwise reported no observations of stability, maintenance, or operational issues of the FAL.

Since the 2024 annual inspection, there have been no noticeable changes in the geometry of the FAL, or any other changes that appear likely to have affected the stability or operation of the FAL.

#### **Evaporation Pond**

The inactive EP had approximately 6 feet of freeboard available at the time of the inspection. This corresponds to approximately 4 feet below the top of the geomembrane liner as measured by a set of rebar rods recently installed within the EP by CPS Energy. Based on information provided by CPS Energy, accounting for accumulated solids, the EP had an available capacity of approximately 30% or 25 acre-feet, with approximately 58 acre-feet of water and CCR contained within the EP.

Grass along the exterior embankment slopes of the EP had some bare spots, which could be due to lack of rain in recent months; grass may naturally return with more moisture and warmer weather. Otherwise, grass along the other exterior embankment slopes was observed to be generally well maintained and no woody plants were observed. Some minor erosion on the west exterior side slope was observed; otherwise no significant rutting, erosion, or other problems were observed at the time of the annual inspection.

Weekly inspection records from January 3, 2025 through December 30, 2025 reported some bare spots on the unit exterior embankment side slopes.

Since the 2024 annual inspection, there have been no noticeable changes in the geometry of the EP, or any other changes that appear likely to have affected the stability of the EP. Silt fence and other erosion controls were installed around the EP perimeter in preparation for closure construction. Based on information provided by CPS Energy, the EP remained dry for the entire year of 2025. The majority of waste contained within the EP are solids. ERM estimates the minimum and maximum combined water and waste volume in the EP during 2025 to both be 58 acre-feet or 70% of available capacity.

### **North and South Bottom Ash Ponds**

The inactive North and South BAPs were offline, drained, and both soil liners and residual CCR were partially excavated and backfilled at the time of the annual inspection.

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

Weekly inspection records from January 3, 2025 through December 30, 2025 reported some erosion, bare spots, and rutting which appear to have been addressed at the time of the inspection. The BAPs should continue to be inspected and maintained until unit closures are completed.

Since the 2024 annual inspection, there have been no noticeable changes in the geometry of the BAPs other than partial excavation and backfill and no changes that may affect the stability of the BAPs were observed. Based on information provided by CPS Energy, the BAPs were substantially empty of water and CCR for the entire year of 2025.

### **Sludge Recycle Holding Pond**

The inactive SRHP contained a minor amount of water and appeared to be substantially empty of CCR at the time of the annual inspection. Both ponds were taken out of service in October 2023 and emptied. Therefore, neither side of the CCR unit was in use for the entire year of 2025. This corresponds to a combined available capacity (including freeboard) of approximately 23 acre-feet, with only a minor amount of stormwater contained within the SRHP.

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

Weekly inspection records from January 3, 2025 through December 30, 2025 reported vegetation overgrowth near the clarifier.

Since the 2024 annual inspection, there have been no noticeable changes in the geometry of the SRHP, or any other changes that appear likely to have affected the stability of the

SRHP. Based on information provided by CPS Energy, the SRHP remained substantially empty of water and CCR for the entire year of 2025.

### **Plant Drains Pond**

The east cell of the PDP contained CCR and water and was the only cell in operation during the annual inspection. The west cell of the PDP was mostly dry and not in use at the time of annual inspection. Based on information from CPS Energy, they switch between the east and west cells throughout the year (as one cell reaches near capacity, they switch to the other). The total combined capacity (including freeboard) is approximately 19 acre-feet. The west cell was substantially empty and the east cell contained approximately (elevation 513 feet) 6 ft of water and CCR during the annual inspection, which corresponds to 6.4 acre-feet with 3.1 acre-feet of capacity available (including freeboard).

Grass along the exterior embankment slopes was fairly well established with some bare spots, which could be due to lack of rain in the recent months; grass may naturally return with more moisture and warmer weather. No significant rutting, erosion, animal burrows, seepage, or other problems observed at the time of the annual inspection.

Based on information provided by CPS Energy, the maximum depth of the water and CCR in the cells of the PDP during 2025 was 6 feet, which corresponds to two feet of freeboard and a volume of approximately 6.4 acre-ft. The minimum depth was 0 feet.

Weekly inspection records from January 3, 2025 through December 30, 2025 had no significant reports of stability, maintenance, or operational issues.

## **4. FUGITIVE DUST CONTROL**

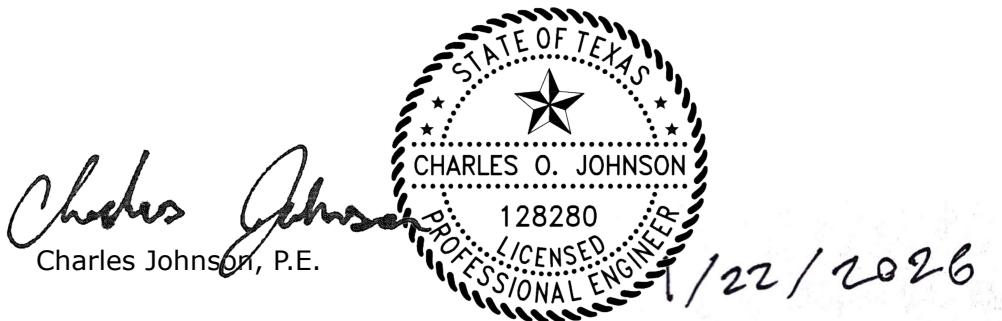
ERM assessed compliance with the *Fugitive Dust Control Plan (FDCP)* in conjunction with the annual inspection. CPS Energy reported that the TCEQ received one citizen complaint regarding air quality at the Calaveras Power Station. Details about the nature of the complaint were not available from the TCEQ. The TCEQ conducted a compliance investigation on April 9 and 10, 2025 and provided a letter dated August 20, 2025 stating "No violations are being alleged as a result of the investigation". Paved roads are reportedly swept twice per week, which is more frequent than the minimum monthly requirement specified in the *FDCP*. Haul roads were reportedly watered daily each morning when in use 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 and at CCR handling facilities.

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, etc.) associated with the CCR units and handling equipment. Reported opacity observations were below 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 512-459-4700.

Sincerely,

Environmental Resources Management Southwest, Inc.



cc: Gregg Tieken, CPS Energy



## ATTACHMENT 1 PHOTOGRAPHS



**Photograph: 1** Fly Ash Landfill – standing on west berm – facing north. Some bare spots noted – no significant erosion.  
Photo taken 11/10/2025.



**Photograph: 2** Fly Ash Landfill – standing on southwest corner – facing north.  
Photo taken 11/10/2025.



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**Photograph: 3** Fly Ash Landfill – standing on northeast corner – facing west. Some bare spots noted – no significant erosion. Photo taken 11/10/2025.



**Photograph: 4** Fly Ash Landfill – standing on northeast corner – facing west. Photo taken 11/10/2025.



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**Photograph: 5** Fly Ash Landfill – standing on northeast corner – facing south.  
Photo taken 11/10/2025.



**Photograph: 6** Fly Ash Landfill – standing on northeast corner – facing south. Some bare spots noted – no significant erosion.  
Photo taken 11/10/2025.



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**Photograph: 7** Fly Ash Landfill – standing on southeast corner – facing north.  
Photo taken 11/10/2025.



**Photograph: 8** Fly Ash Landfill – standing on east berm – facing north. Some bare spots noted – no significant erosion.  
Photo taken 11/10/2025.



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**Photograph: 9** Fly Ash Landfill – standing on southeast corner – facing west.  
Photo taken 11/10/2025.



**Photograph: 10** Fly Ash Landfill – standing on south berm – facing west. Some bare spots noted – no significant erosion. Photo taken 11/10/2025.



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**Photograph: 11** Evaporation Pond – standing on northeast corner – facing west. Photo taken 11/10/2025.



**Photograph: 12** Evaporation Pond – standing on northeast corner – facing south. Photo taken 11/10/2025.



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**Photograph: 13** Evaporation Pond – standing on northeast corner – facing south. Some bare spots noted – no significant erosion. Photo taken 11/10/2025.



**Photograph: 14** Evaporation Pond – standing on northeast corner – facing west. Photo taken 11/10/2025.



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**Photograph: 15** Evaporation Pond – standing on southwest corner – facing north.  
Photo taken 11/10/2025.



**Photograph: 16** Evaporation Pond – standing on southwest corner – facing north. Some bare spots noted – no significant erosion. Photo taken 11/10/2025.



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**Photograph: 17** Evaporation Pond – standing on southwest corner – facing east.  
Photo taken 11/10/2025.



**Photograph: 18** Evaporation Pond – standing on east berm – facing south. Some erosion noted at exterior top of berm and silt fence. Photo taken 11/10/2025.



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**Photograph: 19** South Bottom Ash Pond – Standing on southeast berm – facing north.  
Photo taken 11/10/2025.



**Photograph: 20** South Bottom Ash Pond – Standing on southeast berm – facing west.  
Photo taken 11/10/2025.



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**Photograph: 21** South Bottom Ash Pond – Standing on southeast corner – facing west.  
Photo taken 11/10/2025.



**Photograph: 22** South Bottom Ash Pond – Standing on southwest corner – facing east.  
Photo taken 11/10/2025.



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**Photograph: 23** South Bottom Ash Pond – Standing on southwest corner – facing north.  
Photo taken 11/10/2025.



**Photograph: 24** South Bottom Ash Pond – Standing on southwest corner – facing northeast. Photo taken 11/10/2025.



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**Photograph: 25** North Bottom Ash Pond – Standing on southwest corner – facing east.  
Photo taken 11/10/2025.



**Photograph: 26** North Bottom Ash Pond – Standing on northeast corner – facing west.  
Photo taken 11/10/2025.



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**Photograph: 27** North Bottom Ash Pond – Standing on northeast corner – facing south.  
Photo taken 11/10/2025.



**Photograph: 28** North Bottom Ash Pond – Standing on northwest corner – facing south.  
Photo taken 11/10/2025.



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**Photograph: 29** North Bottom Ash Pond – Standing on northwest corner – facing east.  
Photo taken 11/10/2025.



**Photograph: 30** North Bottom Ash Pond – Standing on northwest corner – facing southeast. Photo taken 11/10/2025.



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**Photograph: 31** South SRH Pond – standing on the southeast corner – facing west.  
Photo taken 11/10/2025.



**Photograph: 32** South SRH Pond – standing on the southeast corner – facing northwest.  
Photo taken 11/10/2025.



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**Photograph: 33** South SRH Pond – standing on the southeast corner – facing north.  
Photo taken 11/10/2025.



**Photograph: 34** South SRH Pond – standing on the northeast corner – facing southwest.  
Photo taken 11/10/2025.



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**Photograph: 35** South SRH Pond – standing on the northwest corner – facing east.  
Photo taken 11/10/2025.



**Photograph: 36** South SRH Pond – standing on the northwest corner – facing south.  
Photo taken 11/10/2025.



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**Photograph: 37** North SRH Pond – standing on the southeast corner – facing west.  
Photo taken 11/10/2025.



**Photograph: 38** North SRH Pond – standing on the southeast corner – facing northwest.  
Photo taken 11/10/2025.



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**Photograph: 39** North SRH Pond – standing on the northeast corner – facing southwest.  
Photo taken 11/10/2025.



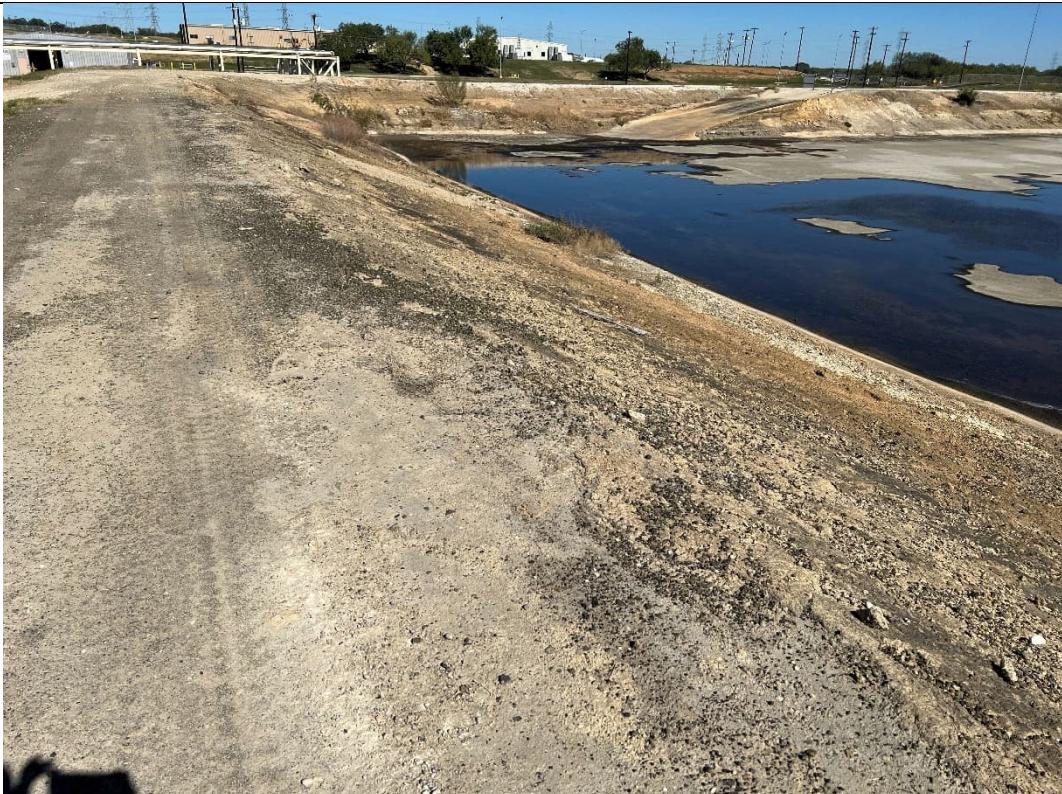
**Photograph: 40** North SRH Pond – standing on the northwest corner – facing east.  
Photo taken 11/10/2025.



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**Photograph: 41** North SRH Pond – standing on the northwest corner – facing south.  
Photo taken 11/10/2025.



**Photograph: 42** North SRH Pond – standing on the southwest corner – facing northeast.  
Photo taken 11/10/2025.



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**Photograph: 43** West Plant Drains Pond – standing on the northwest corner – facing south.  
Photo taken 11/10/2025.



**Photograph: 44** West Plant Drains Pond – standing on the northwest corner – facing southeast. Photo taken 11/10/2025.



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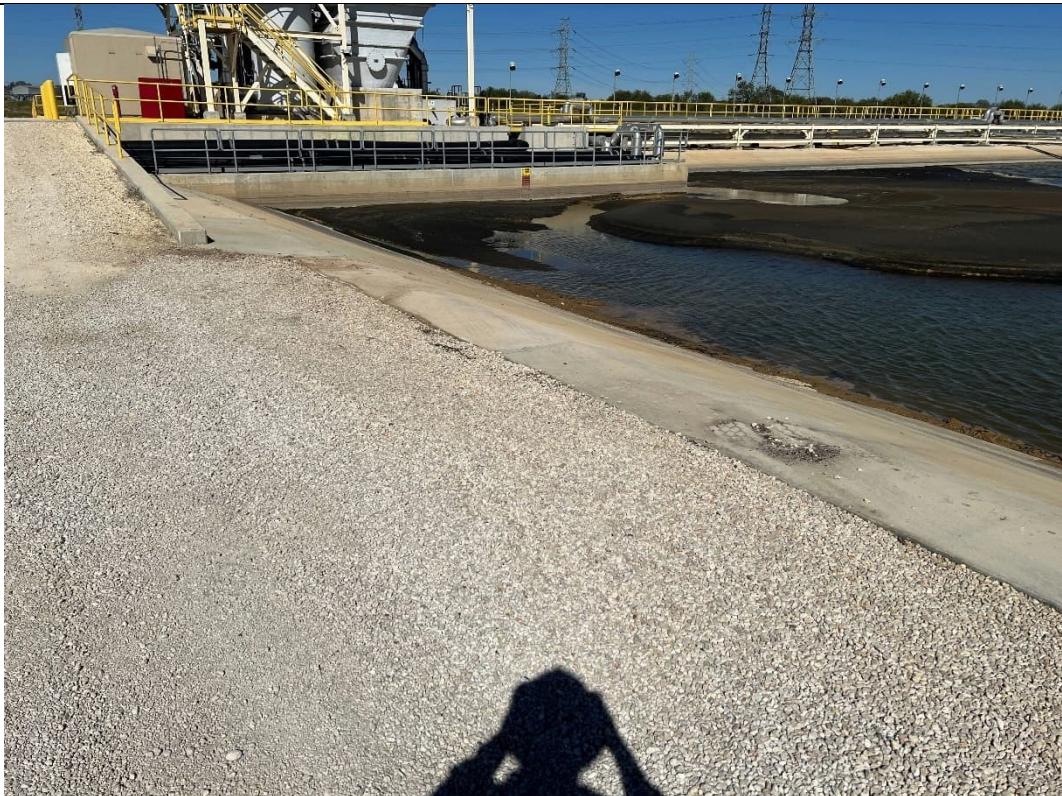
**Photograph: 45** West Plant Drains Pond – standing on the southwest corner – facing east.  
Photo taken 11/10/2025.



**Photograph: 46** West Plant Drains Pond – standing on the southwest corner – facing north.  
Photo taken 11/10/2025.



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**Photograph: 47** East Plant Drains Pond – standing on the south berm – facing northwest.  
Photo taken 11/10/2025.



**Photograph: 48** East Plant Drains Pond – standing on the south berm – facing north.  
Photo taken 11/10/2025.



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**Photograph: 49** East Plant Drains Pond – standing on the south berm – facing east.  
Photo taken 11/10/2025.



**Photograph: 50** East Plant Drains Pond – standing on the south berm – facing west. Photo taken 11/10/2025.



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**Photograph: 51** East Plant Drains Pond – standing on southeast corner – facing southeast.  
Photo taken 11/10/2025.



**Photograph: 52** East Plant Drains Pond – standing on southeast corner – facing north.  
Photo taken 11/10/2025.



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**Photograph: 53** East Plant Drains Pond – standing on northeast corner – facing southwest.  
Photo taken 11/10/2025.



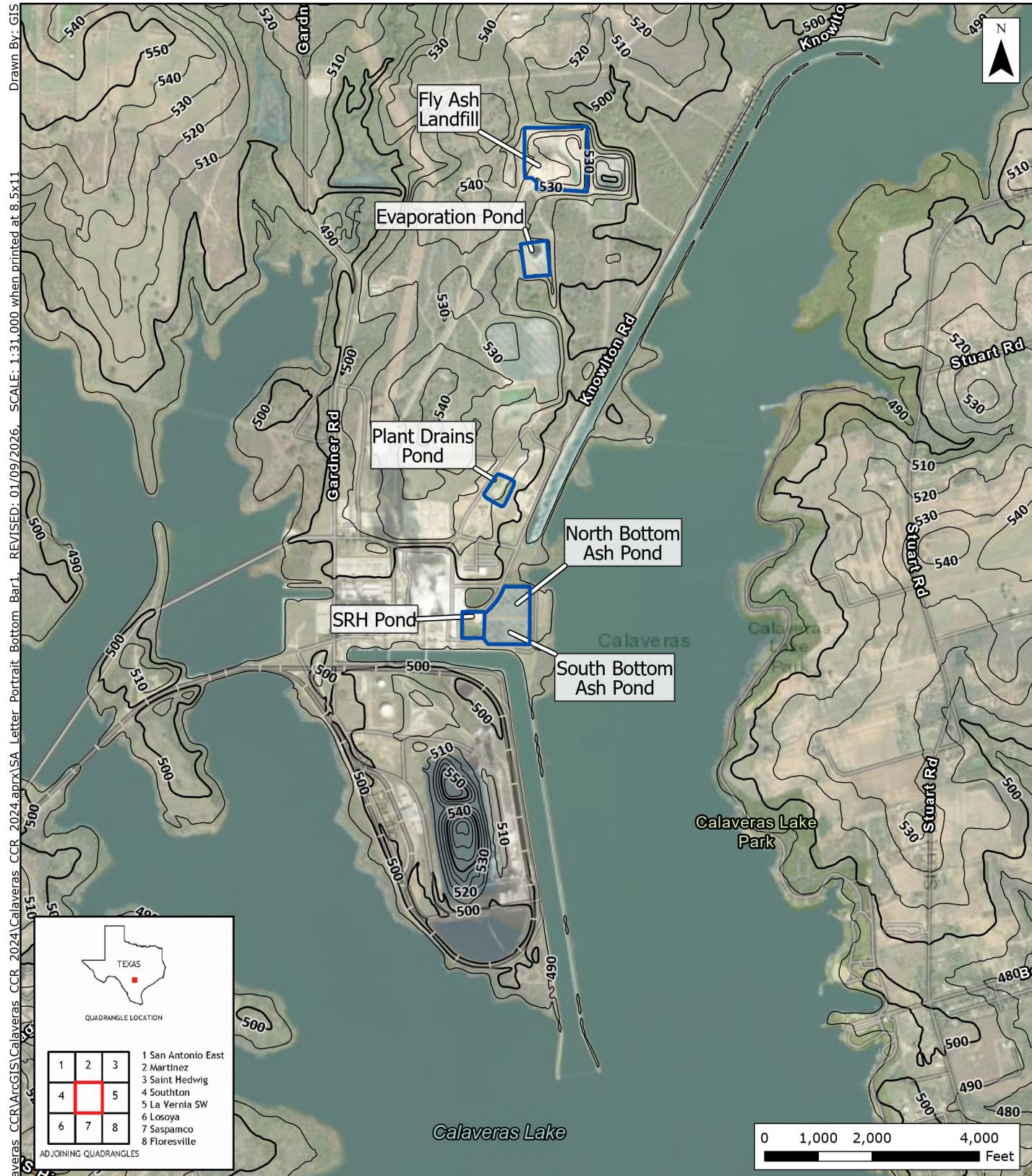
**Photograph: 54** East Plant Drains Pond – standing on the northeast corner – facing west.  
Photo taken 11/10/2025.



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## ATTACHMENT 2 FIGURES



**Figure 1**  
**CCR Unit Locations**  
**CPS Energy**  
 Calaveras Power Station  
 San Antonio, Texas

