



March 1, 2022

Ms. Kirsten Hillyer
U.S. Environmental Protection Agency
Office of Resource Conservation & Recovery (ORCR)
Materials Recovery & Waste Management Division (MRWMD)

Re: Calaveras - CCR Part A Demonstration, Request for Additional Information

Dear Ms. Hillyer:

CPS Energy is in receipt of your February 14, 2022, communication requesting additional information regarding the Alternative Capacity Infeasibility Demonstrations (ACID) dated November 30, 2020, for the Evaporation Pond and the Sludge Recycle Holding (SRH) Pond located at the Calaveras Power Station. CPS Energy is pleased to submit this summary in response to the request.

Additional information requested for the Evaporation Pond ACID - Calaveras Power Station

Request 1: *A narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity.*

Response 1: The following are activities that have been completed or are in progress on the new lined surface impoundment identified in the Evaporation Pond ACID:

- 100% design drawings and specifications - completed
- Permitting
 - Texas Pollutant Discharge Elimination System (TPDES) Permit Amendment and Notification Approval - in progress
 - Texas Commission on Environmental Quality (TCEQ) General Permit Application Preparation and Technical Report Review/Approval - in progress
 - City of San Antonio Cultural Resources and Environmental Permitting Review/Approval - completed
 - City of San Antonio Tree Survey and Permit Review/Approval - completed
 - Bexar County Flood Control Permit - completed
 - Bexar County Storm Water Quality Site Development Permit - completed
- Contractor Bid - completed
- Contractor Bid Evaluation and Management Review - completed
- Contract Negotiation - completed
- CPS Energy Board Review and Approval - completed
- Contract Award - completed
- Site Mobilization and Construction – in progress



Request 2: *A discussion of the issues that led to the delay (if a delay has occurred) to the requested date to cease receipt of waste.*

Response 2: Permitting through the City of San Antonio and Bexar County had delayed the mobilization to the field. Both the City of San Antonio and Bexar County took approximately double the time for the anticipated review period to issue permits. As indicated in the Evaporation Pond ACID, the original mobilization date for the construction of the new lined surface impoundment was October 14, 2021. However due to delays on permitting, the actual mobilization occurred on February 7, 2022.

Request 3: *An updated requested date to cease receipt of waste (if the original date requested has changed).*

Response 3: CPS Energy is requesting that the date to cease receipt of waste be updated to September 30, 2022, to allow non-CCR waste flow to the new lined surface impoundment.

Request 4: *An updated narrative justifying the new date to cease receipt of waste (if the original date requested has changed).*

Response 4: As mentioned above, permitting through the City of San Antonio and Bexar County had delayed the mobilization to the field by four months. The remainder of the construction activities are anticipated to be completed with the original durations as indicated in the Evaporation Pond ACID. The date of the startup & commissioning of the new lined surface impoundment will need to be shifted back four months to September 30, 2022, due to the delayed mobilization.

Additional information requested for the SRH Pond ACID - Calaveras Power Station

Request 1: *A narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity.*

Response 1: The following are activities that have been completed or are in progress on the new lined surface impoundment identified in the SRH Pond ACID:

- Environmental, archeological permits - completed
- Civil earthworks detailed design for the Plant Drains Pond - completed
- Civil structural and mechanical detailed design substantially - completed
- Electrical and controls initial design - completed
- Contractor Bid Evaluation and Management Review - completed
- Approval of Construction Contract - completed
- Obtain permits for construction - in progress
- Mobilize contractor on site - in progress



Request 2: *A discussion of the issues that led to the delay (if a delay has occurred) to the requested date to cease receipt of waste.*

Response 2: No delay has occurred that would change the original requested date.

Request 3: *An updated requested date to cease receipt of waste (if the original date requested has changed).*

Response 3: No change has occurred to the original requested date.

Request 4: *An updated narrative justifying the new date to cease receipt of waste (if the original date requested has changed).*

Response 4: No change has occurred to the original requested date.

Please call me at (210) 353-3625 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael M. Malone", written over a horizontal line.

Michael M. Malone, P.E.
CPS Energy Senior Manager
Environmental Management