

May 31, 2019

Mr. Michael Malone
CPS Energy
145 Navarro Street
San Antonio, Texas 78205

Project No. 0503422

CityCentre Four
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Subject: CCR Units – 2016 Annual Fugitive Dust Control Report
Calaveras Power Station
San Antonio, Texas



Dear Mr. Malone:

CPS Energy owns and operates the Calaveras Power Station which consists of two power plants that are subject to regulation under Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (a.k.a. the Coal Combustion Residuals [CCR] Rule). Per 40 CFR §257.80 (c), Environmental Resources Management (ERM) prepared this Annual Fugitive Dust Control Report to document actions taken to control CCR fugitive dust, record all citizen complaints, and summarize any corrective actions taken in 2016.

CCR Fugitive Dust Control Measures

ERM assessed compliance with the Fugitive Dust Control Plan (FDCP). Control measures implemented at the CPS Energy Calaveras Power Station included containing CCR inside enclosures or partial enclosures; operating water spray and fogging systems; reducing fall distances at material drop points; transporting CCR while moist; using wind barriers; using compaction and vegetative covers; enforcing vehicle speed limits; covering trucks transporting CCR; and reducing or halting operations during high wind. In addition, paved roads were reportedly swept several times per month, which is more frequent than the minimum monthly requirement specified in the FDCP.

Citizen Complaints

CPS Energy reported no citizen complaints regarding fugitive dust emissions from the CCR units or the handling equipment.

Corrective Measures

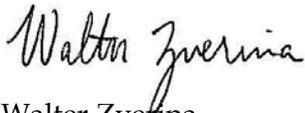
Visual observations were made quarterly at each CCR unit. Emission observations are recorded on a standard opacity form utilized for non-CCR inspections and not on the form provided in the FDCP. The standard opacity form contains more detailed information than the FDCP form. Emissions were observed and recorded during various operations (i.e., stacking at gypsum pile, truck loading at ash silos/dust collectors, ash dumping at landfill) associated with the CCR units and handling equipment. All reported opacity observations were within the limits of the New Source Performance Standard. As such, no corrective actions were necessary.

This report must be maintained in the facility's operating record and must be uploaded to the established CCR website.

We appreciate the opportunity to work with you on this project. Should you have any questions, please contact us.

Sincerely,

Environmental Resources Management



Walter Zverina
Senior Project Manager

cc: Gregg Tieken, CPS Energy