



**40 CFR 257.103(f)(2) Alternative Closure Requirements
Annual Alternative Capacity Update
and
Impoundment Closure Progress Report**

**CLECO Power LLC
Dolet Hills Power Station
Mansfield, LA**

December 1, 2021 - November 30, 2022

Background

Cleco Power's (Cleco) Dolet Hills Power Station (DHPS) is located in Mansfield, Louisiana. There is one generating unit at DHPS. The DHPS unit is a solid fuel boiler, which utilizes lignite to generate electricity.

Prior to September 2022, DHPS utilized Bottom Ash Basins 1 and 2 to manage CCR from Unit 1 and several other non-CCR wastestreams. Bottom ash was sent to the Bottom Ash Basins via bottom ash sumps and sluice piping. Non-CCR wastestreams consisted of demineralizer and pretreatment drains, demineralizer regeneration waste, pretreatment clarifier blowdown, stormwater runoff, and previously monitored wastewater from the treated sanitary wastewater system and hydrostatic testing discharges.

On August 28, 2020, EPA revised the CCR rule to require all unlined surface impoundments to cease receipt of waste and initiate closure by April 11, 2021. However, the CCR rule also includes site-specific alternative deadlines for surface impoundments to cease receipt of waste and initiate closure. One of these alternative closure provisions, 40 CFR 257.103(f)(2), provides a closure extension if a coal-fired boiler(s) at a facility will cease coal-fired operation by a date certain, but a surface impoundment must continue to be used due the lack of on-site and off-site alternative disposal capacity for CCR and non-CCR wastestreams. Surface impoundments that qualify for this extension and are larger than 40 acres must complete closure by October 17, 2028. Qualifying surface impoundments that are 40 acres or smaller must complete closure by October 17, 2023.

Cleco has elected to close the DHPS Bottom Ash Basins under 40. CFR 257.103(f)(2). On November 30, 2020, Cleco submitted a demonstration to EPA (Part A Demonstration) requesting approval to close under this alternative closure provision. In the demonstration, Cleco proposed that DHPS will cease generating coal-fired electricity by October 17, 2023. In the interim, however, the Bottom Ash Basins must continue to receive bottom ash and the above-mentioned non-CCR wastestreams from DHPS given the lack of alternative on-site and off-site disposal capacity. Accordingly, Cleco requested a site-specific extension for the Bottom Ash Basins to cease receipt and initiate closure after April 11, 2021 and complete closure by no later than October 17, 2023. This demonstration was deemed complete by the EPA and was pending final approval when the facility ceased placement of CCR and non-CCR wastes on September 1, 2022. Following the cessation of waste placement, Cleco initiated closure of the impoundments and officially withdrew the Part A Demonstration. The withdrawal documentation has been uploaded to Cleco's CCR website.

In accordance with 40 CFR 257.103(f)(2)(x), this progress report will provide an update on progress towards the closure of the CCR surface impoundments and outline the continued lack of alternative disposal capacity.

Purpose

As required by 40 CFR 257.103(f)(2)(x), this annual report will document the continued lack of alternative capacity and Cleco's progress towards the closure of the Bottom Ash Basins at

DHPS. This progress report is considered complete once the report has been placed in DHPS's operating record as required by 40 CFR 257.105(i)(20).

This Progress report contains information covering the period from December 1, 2021 through November 30, 2022.

Alternative Capacity Update

Prior to September 1, 2022, the DHPS Bottom Ash Basins received bottom ash, demineralizer and pretreatment wastewater drains, demineralizer regeneration waste, pretreatment clarifier blowdown, stormwater runoff, and previously monitored wastewater from the treated sanitary wastewater system and hydrostatic testing discharges.

Bottom ash was collected in the bottom ash sump under the boiler and pumped through a sluice piping network, which discharged into the Bottom Ash Basins. As stated in Cleco's Part A Demonstration, Cleco considered several alternative disposal options for this CCR wastestream. However, as EPA recognized in the preamble of the Part A final rule, the alternative disposal options for sluiced or wet handled CCR are greatly limited, and Cleco determined that none of the alternatives were viable.

Cleco also considered other disposal options for the above-mentioned non-CCR wastestreams. However, Cleco was not able to identify a viable alternate for these wastestream. Similarities between the bottom ash transport system and the non-CCR wastestreams, such as piping networks, the lack of a dewatering system, and inadequate tank availability onsite, were key factors in Cleco's determination.

Cleco also stated in the Part A Demonstration that despite efforts to obtain on-site and/or off-site alternative disposal capacity for the CCR and non-CCR wastestreams that were being placed in the Bottom Ash Basins, no other options are currently available. As of September 1, 2022, there are no longer any CCR or non-CCR wastestreams being placed in the impoundments. These wastestreams have been eliminated by the retirement of the coal fired boiler at DHPS.

Progress

In December of 2021, Cleco ceased coal-fired operations at DHPS. Cleco has since engaged engineering consultants to design closure plans and develop a CCR Notice of Intent to Close (NOI). The CCR NOI has been uploaded to Cleco's CCR website and the closure plans are pending approval by the Louisiana Department of Environmental Quality (LDEQ).

Additionally, in accordance with state regulations, a LDEQ NOI was submitted to LDEQ, which contained the final closure plans for the bottom ash impoundments. As mentioned above, these closure plans are pending LDEQ review.

Throughout the history of DHPS, Cleco has transferred bottom ash from the Bottom Ash Basins to the on-site CCR landfill, as permitted by the LDEQ Solid Waste Permits for the facility. In 2022, Cleco was able to continue this activity and reduce the amount of bottom ash in the Bottom Ash Basins, which will make closure milestones easily attainable.

Summary

Cleco has officially retired the coal fired boiler at DHPS and ceased placement of all wastes in the bottom ash impoundments. Following the cessation of waste placement, Cleco initiated closure of the impoundments and officially withdrew the Part A Demonstration. The withdrawal documentation has been uploaded to Cleco's CCR website. Cleco continues to ensure compliance with all applicable requirements of 40 CFR 257 Subpart D, and this progress report will serve as the final progress report for DHPS.