

**CLECO POWER LLC**  
**BRAME ENERGY CENTER**  
**LENA, RAPIDES PARISH, LOUISIANA**



**CCR COMPLIANT POST-  
CLOSURE PLAN**

**ASH MANAGEMENT LANDFILL  
CELL4**

**AGENCY INTEREST NO. 2922**

**D-079-0390/P-0379-R1-M3**

**DECEMBER 2023**

Providence Engineering and Environmental Group LLC  
1201 Main Street  
Baton Rouge, LA 70802  
(225) 766-7400  
[www.providenceeng.com](http://www.providenceeng.com)  
Providence Project No: 002-322



TABLE OF CONTENTS

| <u>Section</u>                            | <u>Page</u> |
|---|-------------|
| 1.0 INTRODUCTION .....                    | 1           |
| 2.0 PLAN OBJECTIVES .....                 | 1           |
| 3.0 EXISTING CONDITIONS .....             | 2           |
| 4.0 POST-CLOSURE PLAN .....               | 2           |
| 4.1 Groundwater Monitoring.....           | 2           |
| 4.2 Site Inspections .....                | 2           |
| 4.3 Post-Closure Contact.....             | 2           |
| 4.4 Property Use .....                    | 3           |
| 4.5 Completion of Post-Closure Care ..... | 3           |
| 5.0 REVISIONS AND AMENDMENTS.....         | 3           |

LIST OF APPENDICES

Appendix

A Certification

## 1.0 INTRODUCTION

On April 17, 2015, the United States Environmental Protection Agency (EPA) issued the final version of the federal coal combustion residuals rule (CCR Rule) to regulate the disposal of CCR materials generated at coal-fired units. The rule is being administered as part of the Resource Conservation and Recovery Act (RCRA, 42 U.S.C. §6901 et seq.), using the Subtitle D approach.

Cleco Power LLC (Cleco) operates an existing coal combustion residuals (CCR) landfill referred to as the Ash Management Landfill at the Brame Energy Center (BEC) located near Boyce, Rapides Parish, Louisiana. The landfill is considered a Type I Industrial Facility by the Louisiana Department of Environmental Quality and operates under solid waste permit P-0379-R1-M3. Cells 1-3 of the Ash Management Landfill were active prior to the effective date of the CCR Rule. On October 11, 2021, the Louisiana Department of Environmental Quality (LDEQ) approved a minor modification for design changes to Cell 4 to comply with CCR design requirements. These changes included raising the excavation grades in Cell 4, changes to final waste grades, raising the perimeter levee elevations, and reorientation of the leachate collection trenches. Cleco contracted and completed the design and construction of the lateral expansion for Cell 4 of the Ash Management Landfill. This report is to certify that Cell 4 of the Ash Management Landfill was designed, operates and meets the criteria outlined in 40 CFR 257.61(a).

Per 40 CFR §257.104(d)(4), Cleco must obtain certification from a qualified professional engineer that the post-closure meets the requirements of 40 CFR 257.104(d)(1) and is included in **Appendix A**.

This closure plan is in addition to, not in place of, any other applicable site permits, environmental standards, or work safety practices.

## 2.0 PLAN OBJECTIVES

In accordance with 40 CFR §257.104(d)(1), the Post-Closure Plan must contain the following:

- A description of post-closure care maintenance activities (and frequency of these activities) include the following:
  - Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.
  - Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of 40 CFR §257.90 through 40 CFR §257.98
  - For new CCR Landfills or any lateral expansion of a CCR Landfill, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of 40 CFR §257.70.
- The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period.
- A description of the planned uses of the property during the post-closure period.
  - Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring

system unless necessary to comply with 40 CFR §257.104 or if the owner or operator of the CCR unit demonstrates that the disturbance (including any removal of CCR) will not increase the potential threat to human health or the environment.

Per 40 CFR §257.104(d)(4), Cleco must obtain certification from a qualified professional engineer that the post-closure plan, and subsequent updates to the plan, meet the requirements for 40 CFR §257.104. This sealed document serves as that certification.

### **3.0 EXISTING CONDITIONS**

BEC is located near Boyce, Rapides Parish, Louisiana. BEC contains one CCR landfill (Cell 4) which is permitted by the Louisiana Department of Environmental Quality (LDEQ) under Permit No. P-0379-R1-M3. Cell 4 receives fly ash and bed ash generated during the operation of electric utility boiler in Unit 2. As noted in the permit and closure plan, the CCR unit will be closed by leaving the CCR material in place.

### **4.0 POST-CLOSURE PLAN**

Post-closure monitoring and maintenance will be as described in 40 CFR §257.104(b) of the CCR Rule. Cell 4 is a CCR landfill and will be closed through leaving CCR material in place. Procedures planned for closing the CCR unit are described here.

#### **4.1 Groundwater Monitoring**

Cleco will conduct sampling of the CCR unit monitoring network per 40 CFR §257.90 through §257.98 of the CCR Rule throughout the 30-year post-closure care period. If at the end of the 30-year post-closure care period, Cleco is operating under the assessment monitoring in accordance with 40 CFR §257.95, Cleco will continue to conduct post-closure care until the facility returns to detection monitoring in accordance with 40 CFR §257.95. Sampling for compliance with the CCR Rule will be performed semi-annually.

#### **4.2 Site Inspections**

Site inspections will be performed annually during the post-closure care period to confirm that the integrity and effectiveness of the final cover system is maintained per 40 CFR §257.104(b)(1). Maintenance of the final cover will include making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover. The area will be mowed approximately four times watch year to control vegetative growth. During the site inspections, Cleco will also inspect groundwater monitoring wells to confirm that they are in accordance with the requirements of 40 CFR §257.90 through 267.98 and inspect the leachate collection and removal system.

#### **4.3 Post-Closure Contact**

Per 40 CFR §257.104(d)(ii), Cleco has designated a contact for Cell 4 post-closure care period. The contact information is below:

|                      |                          |
|----------------------|--------------------------|
| <b>Name:</b>         | Environmental Specialist |
| <b>Affiliation:</b>  | Cleco Power, LLC         |
| <b>Address:</b>      | 275 Rodemacher Road      |
| <b>Phone Number:</b> | 318-793-1194             |
| <b>Email:</b>        | Elizabeth.lee@cleco.com  |

#### 4.4 Property Use

Cell 4 will be used as a grassland and wildlife area during the post-closure care period. The property is located within a secured power plant facility and will only be accessed during inspection and groundwater monitoring activities.

#### 4.5 Completion of Post-Closure Care

No later than 60 days following the completion of the post-closure care period, a notification verifying that post-closure care has been completed will be prepared and placed in the facility's CCR Operating Record. The notification will include certification by a qualified professional engineer in the State of Louisiana that post-closure care has been completed in accordance with the written Post-Closure Plan in effect and the requirements of 40 CFR §257.104.

### 5.0 REVISIONS AND AMENDMENTS

The initial Post-Closure Plan will be placed in the CCR Operating Record. The plan will be amended whenever there is a change in operation of the CCR unit that would substantially affect the current or planned closure operations. The Post-Closure Plan will be amended 60 days prior to a planned change in operation, or within 60 days following an unplanned change in operation. If a written Post-Closure Plan is revised after post-closure activities have commenced, the written Post-Closure Plan will be amended no later than 30 days following the triggering event. The initial Post-Closure Plan and any amendment will be certified by a qualified professional engineer in the State of Louisiana for meeting the requirements of 40 CFR §257.104 of the CCR Rule. Amendments and revisions will be placed on the CCR public website within 30 days following placement in the facility's CCR Operating Record.

**APPENDIX A**  
**CERTIFICATION**

APPENDIX A  
CERTIFICATION

I certify that this Post-Closure Plan fulfills the minimum requirements of 40 CFR 257.104, as applicable. This certification is based on my review of the Post-Closure Plan and operational information about the CCR unit.

**Gary J. Leonards, P.E.**

Name

**30568**

**Louisiana**

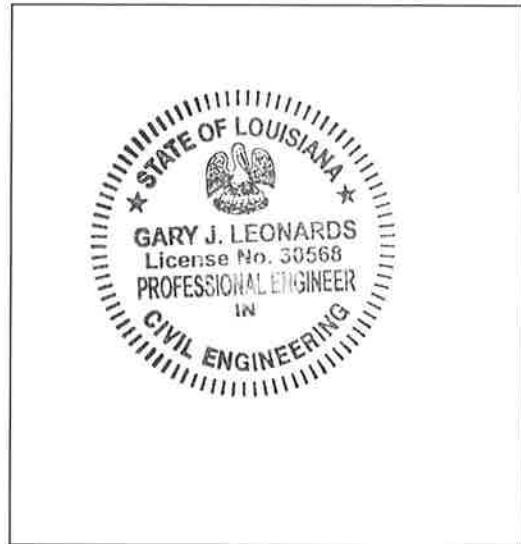
Registration No.

State

Signature

12/29/23

Date



(Seal)