

Inflow Design Flood Control System Plan Brame Bottom Ash Pond



CLECO Corporation

Rodemacher Unit 2
Project No. 90965

Revision 0
10/14/2016

Inflow Design Flood Control System Plan Brame Bottom Ash Pond

prepared for

**CLECO Corporation
Rodemacher Unit 2
Rapides Parish, Louisiana**

Project No. 90965

**Revision 0
10/14/2016**

prepared by

**Burns & McDonnell Engineering Company, Inc.
Kansas City, Missouri**

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INDEX AND CERTIFICATION

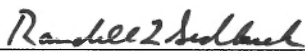
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Report Index

<u>Chapter Number</u>	<u>Chapter Title</u>	<u>Number of Pages</u>
1.0	Introduction	1
2.0	Plan Objectives	1
3.0	Existing Conditions	1
4.0	Design Basis / Flood Control System	2
5.0	Hydrologic and Hydraulic Capacity	2
6.0	Results	1
7.0	Periodic Assessment and Amendment	1
8.0	Record of Revisions and Updates	1
Appendix A	Site Plan	2
Appendix B	Engineering Calculations	3

Certification

I hereby certify, as a Professional Engineer in the state of Louisiana, that the information in this document was assembled under my direct supervisory control. This report is not intended or represented to be suitable for reuse by the CLECO Corporation or others without specific verification or adaptation by the Engineer.



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Date: 10/14/16

TABLE OF CONTENTS

	<u>Page No.</u>
1.0 INTRODUCTION	1-1
2.0 PLAN OBJECTIVES	2-1
3.0 EXISTING CONDITIONS	3-1
4.0 DESIGN BASIS / FLOOD CONTROL SYSTEM	4-1
4.1 Hazard Potential Classification	4-1
4.2 Inflow Design Flood System Criteria	4-1
4.2.1 Capacity Criteria	4-1
4.2.2 Freeboard Criteria	4-1
4.2.3 Flood Routing Design Criteria	4-1
4.3 Project Mapping	4-1
4.3.1 Mapping Sources	4-1
4.3.2 Vertical Datum	4-1
4.3.3 Horizontal Coordinate System	4-2
5.0 HYDROLOGIC AND HYDRAULIC CAPACITY	5-1
5.1 Pond Inflows	5-1
5.1.1 Runoff	5-1
5.1.2 Process Flows	5-1
5.2 Pond Outflows	5-2
6.0 RESULTS	6-1
7.0 PERIODIC ASSESSMENT AND AMENDMENT	7-1
8.0 RECORD OF REVISIONS AND UPDATES	8-1
APPENDIX A – SITE PLAN	
APPENDIX B – ENGINEERING CALCULATIONS	

LIST OF TABLES

	<u>Page No.</u>
Table 5-1: Watershed Runoff Calculated Data for Brame Bottom Ash Pond.....	5-1
Table 6-1: Modeled Pond Design	6-1

LIST OF ABBREVIATIONS

<u>Abbreviation</u>	<u>Term/Phrase/Name</u>
ac	acre
BMcD	Burns & McDonnell
Brame	Brame Energy Center
CCR	Coal Combustion Residual
CFR	Code of Federal Regulations
cfs	cubic feet per second
CLECO	CLECO Corporation
CY	cubic yard
ELG	Effluent Limitations Guidelines
EPA	Environmental Protection Agency
ft	feet
GPM	Gallons per Minute
hr	hour
in	inch
LDOTD	Louisiana Department of Transportation and Development
LPDES	Louisiana Pollutant Discharge Elimination System
LSU	Louisiana State University
MGD	Million Gallons per Day
min	minute
NAD 83	North American Datum of 1983
NAVD 88	North American Vertical Datum of 1988

<u>Abbreviation</u>	<u>Term/Phrase/Name</u>
NGVD 29	National Geodetic Vertical Datum of 1929
NRCS	Natural Resources Conservation Service
PFDS	Precipitation Frequency Data Server
RCRA	Resource Conservations and Recovery Act
SCS	Soil Conservation Service
U.S.C.	United States Code
USDA	US Department of Agriculture

1.0 INTRODUCTION

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

The existing CCR impoundments at CLECO Corporation's (CLECO's) Brame Energy Center (Brame) are subject to the CCR Rule and as such must meet the hydrologic and hydraulic capacity requirements outlined in 40 Code of Federal Regulations (CFR) §257.82. This report serves as the inflow design flood control system plan for the Bottom Ash Pond at Brame.

This inflow design flood control system plan is in addition to, not in place of, any other applicable site permits, environmental standards, or work safety practices.

2.0 PLAN OBJECTIVES

Per 40 CFR §257.82, the inflow design flood control system plan must contain documentation (including supporting engineering calculations) that the inflow design flood control system has been designed and constructed to:

- Adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood,
- Adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood, and
- Handle discharge from the CCR surface impoundment in accordance with the surface water requirements described in 40 CFR §257.3-3.

Per 40 CFR §257.82(c)(5), CLECO must obtain certification from a qualified professional engineer that the inflow design flood control system plan, and subsequent updates to the plan, meet the requirements of 40 CFR §257.82. This sealed document serves as that certification.

3.0 EXISTING CONDITIONS

Brame is located northwest of Alexandria in Rapides Parish, Louisiana. The Bottom Ash Pond is a 42.25-acre diked pond with approximately 1,100,000 CY of capacity. A site plan is included in Appendix A. The impoundment is surrounded by a 20-foot wide perimeter dike with a crest elevation of approximately 105 feet based on existing survey information.

The pond receives bottom ash, economizer ash, sluice water, and other process flows from Rodemacher Unit 2. CCR material is sluiced to the pond at 2.16 million gallons per day (MGD) for approximately 12 hours each day. Normal pool elevation is maintained at an elevation of approximately 94 feet through the use of a pump that operates on a float system. Periodically a separate, manually-operated pump is used to pump rainfall collected in the adjacent Fly Ash Pond into the Bottom Ash Pond; however, flow from the Fly Ash Pond has not been included as part of this analysis because rainfall collected in the Fly Ash Pond will be retained in the Fly Ash Pond until plant operators turn on the pump.

Excess water collected in the Bottom Ash Pond is pumped through a 24-inch corrugated metal pipe to an overflow channel where it can be discharged into Lake Rodemacher via permitted LPDES Outfall 401. The invert elevation of the corrugated metal pipe is 102.6 feet.

4.0 DESIGN BASIS / FLOOD CONTROL SYSTEM

4.1 Hazard Potential Classification

Per 40 CFR §257.73, CLECO has determined the Brame Bottom Ash Pond to be a significant hazard potential CCR surface impoundment.

4.2 Inflow Design Flood System Criteria

4.2.1 Capacity Criteria

The CCR Rule requires CCR surface impoundments to have adequate hydrologic and hydraulic capacity to manage flows for the inflow design flood. For this analysis, the criteria was interpreted as being the top of the surface impoundment dike should not be overtopped during the inflow design flood event.

4.2.2 Freeboard Criteria

The CCR documentation further discusses that operating freeboard must be adequate to meet performance standards, but a specific freeboard is not defined.

4.2.3 Flood Routing Design Criteria

The inflow design flood for this analysis is a 1,000-year flood event per 40 CFR §257.82(a)(3)(ii).

4.3 Project Mapping

Project mapping for this analysis consisted of an inventory of stormwater assets that contribute to the surface impoundment. Three primary sources of information were utilized: construction record drawings, plant operational information, and survey data.

4.3.1 Mapping Sources

Survey data utilized included LIDAR topography from the Louisiana State University (LSU) Atlas Lidar Downloader, retrieved in January of 2016. Construction record drawings of the surface impoundment were also utilized in the analysis.

4.3.2 Vertical Datum

Elevations shown on the existing drawings are in the National Geodetic Vertical Datum of 1929 (NGVD 29). Mapping sources referenced were in the North American Vertical Datum of 1988 (NAVD 88) and have been converted to NGVD 29.

4.3.3 Horizontal Coordinate System

Data from the LSU Atlas Lidar which was utilized as the basis for mapping and modeling efforts is in the Louisiana State Plane North, North American Datum of 1983 (NAD 83) coordinate system.

5.0 HYDROLOGIC AND HYDRAULIC CAPACITY

HEC-HMS 4.0 was used to model reservoir characteristics under the design storm event. Inputs to the HEC-HMS model were assumed to be as follows.

5.1 Pond Inflows

5.1.1 Runoff

5.1.1.1 Recurrence Interval and Rainfall Duration

The inflow flood design event for this study, as dictated by the hazard potential classification, was a 1,000-year flood event. Because a storm duration is not specified under 40 CFR §257.82 or other pertinent inflow flood design sections within the CCR Rule, a 24-hour storm duration was utilized.

5.1.1.2 Rainfall Distribution and Depth

The Soil Conservation Service (SCS) Type III rainfall distribution was used for computations associated with this evaluation. Precipitation data was acquired from the NOAA Precipitation Frequency Data Server (PFDS). Precipitation depth for the inflow design flood event is 22.6 inches.

5.1.1.3 Subbasin Characteristics

Calculations were determined based on the watershed parameters shown in Table 5-1. Refer to Appendix B for more detailed calculations.

Table 5-1: Watershed Runoff Calculated Data for Brame Bottom Ash Pond

Component	Value	Unit
Watershed Area	45.4	ac
SCS Storm Depth: 1,000-yr, 24-hr	22.6	in
Weighted Curve Number	86	-
Initial Abstraction	0.326	in
Time of Concentration	30.90	min
Basin Lag Time	18.54	min

5.1.2 Process Flows

When conducting the hydraulic analysis, it was assumed that the pond is maintained at the normal operating level (94.0 feet) prior to the storm event. All discharge into the pond is considered to be additional flow above the normal operating level. It was assumed sluicing operations would be maintained for the duration of the storm event control period.

5.2 Pond Outflows

Stage discharge information was not included in this model. To be conservative, it was assumed the Bottom Ash Pond pump system would be inoperable for the duration of the storm event control period.

6.0 RESULTS

The pond was modeled for a 1,000-year, 24-hour storm event with initial elevation set at normal operating level, no discharge, and the pond being 50% full of bottom ash up to the top of the dike.

Under the assumed conditions, the pond was able to contain runoff from the 1,000-year, 24-hour storm without overtopping. The results of the modeled storm event are as follows:

Table 6-1: Modeled Pond Design

Component	Property	Value	Unit
Subbasin Watershed	Peak Discharge	555.6	cfs
	Runoff Volume	20.8	in
Source Sluice Flow	Peak Discharge	3.3	cfs
Reservoir Bottom Ash Pond - 50% full of ash	Initial EL	94.0	ft
	Peak Inflow	559.0	cfs
	Peak Discharge	0.0	cfs
	Peak Elevation	100.5	ft
	Peak Storage (storage above initial EL)	109.7	ac-ft

After a significant storm event, excess water collected in the Bottom Ash Pond can be discharged via pumping to the permitted LPDES Outfall 401 similar to current operations.

7.0 PERIODIC ASSESSMENT AND AMENDMENT

CLECO must place the initial plan in the CCR Operating Record by October 17, 2016. After the initial plan is published in the Operating Record, periodic inflow design flood control system plans will be required every five years. CLECO may publish revised plans at shorter intervals, noting, however, the deadline for publishing the next revision will be maintained as five years after publish of the previous revision. CLECO may amend the plan at any time, and is required to do so whenever there is a change in conditions which would affect the current plan. All amendments and revisions must be placed on the CCR public website. A record of revisions made to this document is included in Section 8.0.

8.0 RECORD OF REVISIONS AND UPDATES

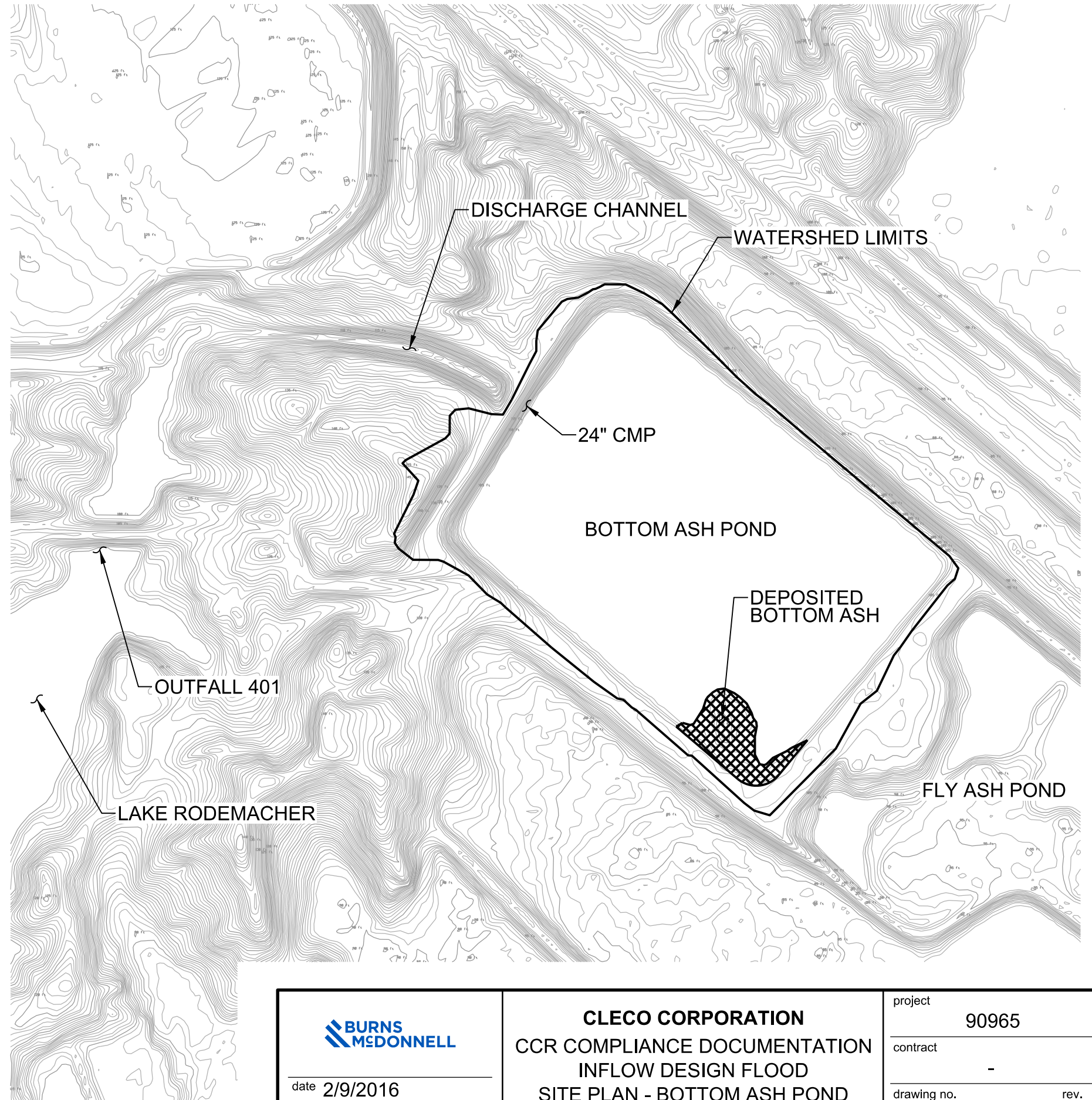
Revision Number	Date	Revisions Made	By Whom
0	10/14/2016	Initial Issue	Burns & McDonnell

APPENDIX A – SITE PLAN

NOTES:

- EXISTING CONTOURS PER LOUISIANA STATE UNIVERSITY ATLAS LIDAR DOWNLOADER, RETRIEVED JANUARY 2016
- ASH POND OPERATING CHARACTERISTICS ARE AS FOLLOWS:

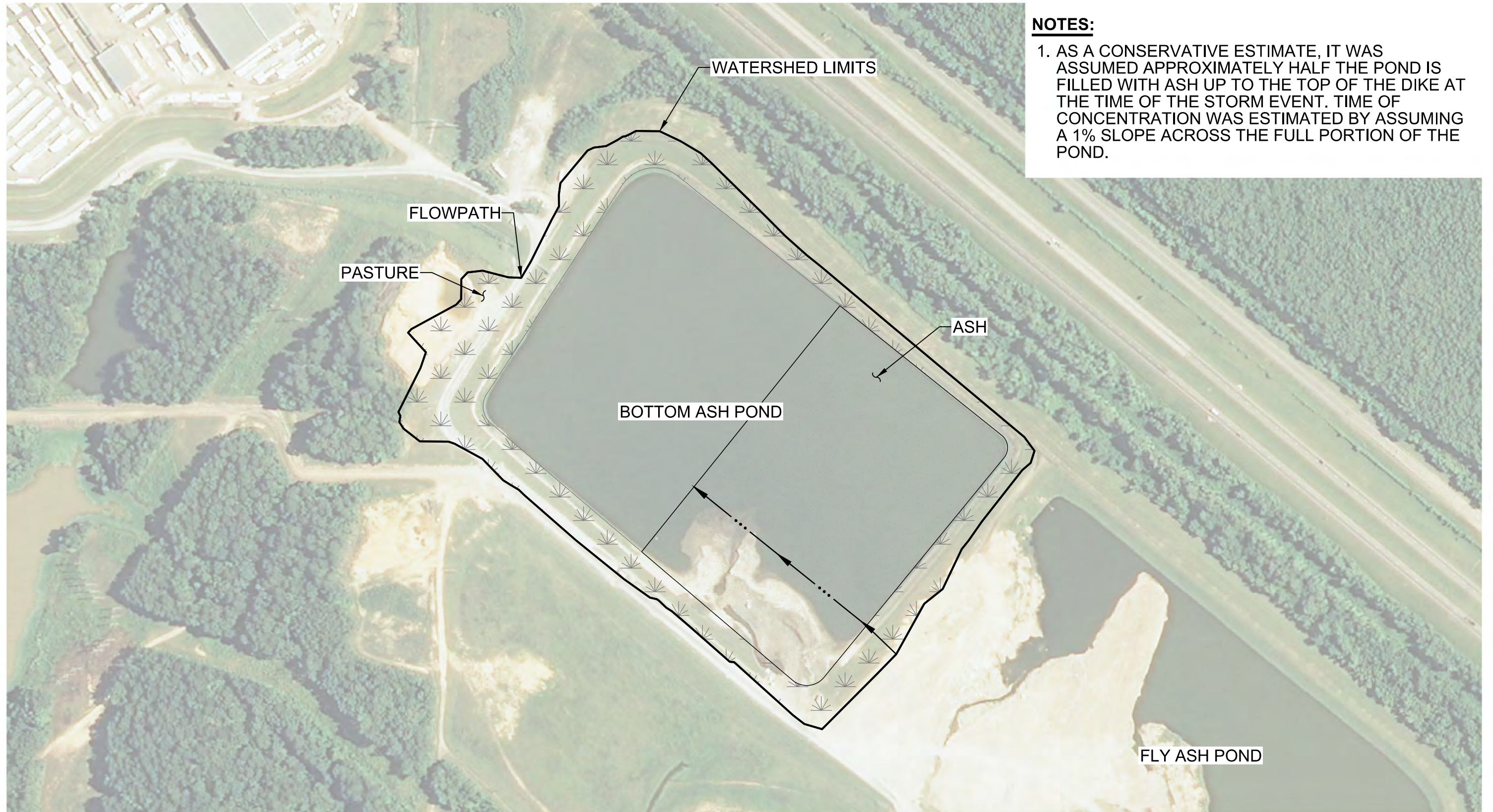
	WATERSHED AREA (AC)	OPERATING LEVEL (FT)
BOTTOM ASH POND	45.4	94



date 2/9/2016
designed A. MYERS

CLECO CORPORATION
CCR COMPLIANCE DOCUMENTATION
INFLOW DESIGN FLOOD
SITE PLAN - BOTTOM ASH POND

project	90965
contract	-
drawing no.	SK - CIVIL - 001
rev.	0



NOTES:

1. AS A CONSERVATIVE ESTIMATE, IT WAS ASSUMED APPROXIMATELY HALF THE POND IS FILLED WITH ASH UP TO THE TOP OF THE DIKE AT THE TIME OF THE STORM EVENT. TIME OF CONCENTRATION WAS ESTIMATED BY ASSUMING A 1% SLOPE ACROSS THE FULL PORTION OF THE POND.



date 2/9/2016
designed A. MYERS

CLECO CORPORATION
CCR COMPLIANCE DOCUMENTATION
INFLOW DESIGN FLOOD
SITE PLAN - BOTTOM ASH POND

project	90965
contract	-
drawing no.	SK - CIVIL - 002
rev.	0

APPENDIX B – ENGINEERING CALCULATIONS

- 10 Weighted Curve Number
 $CN_W = (CN_i * A_i) / A_T$
- 11 Weighted Rational Runoff Coefficient
 $C_W = (C_i * A_i) / A_T$

VARIABLES:

- 1 Q peak runoff rate, cfs
 2 C rational runoff coefficient, unitless
 3 I rainfall intensity, in/hr
 4 A_d total drainage area, ac or mi²
 5 t_{sheet} sheet flow travel time, min
 6 n Manning's roughness coefficient, unitless
 7 L hydraulic length of the watershed, ft
 8 P_2 2yr 24hr rainfall, in
 9 $S_{decimal}$ slope, ft/ft
 10 $t_{shallow}$ shallow concentrated flow travel time, min
 11 $V_{shallow}$ shallow velocity, ft/s
 12 $t_{channel}$ channel flow travel time, min
 13 $V_{channel}$ channel velocity, ft/s
 14 t_c time of concentration, min
 15 t_{lag} lag time, hrs
 16 S soil water storage capacity, in
 17 CN curve number, unitless
 18 I_a initial abstraction, in
 19 CN_W weighted curve number, unitless
 20 A_T total area, ac
 21 C_W weighted rational runoff coefficient, unitless
 22 CN_{WT} total weighted curve number, unitless
 23 C_{WT} weighted rational runoff coefficient, unitless

CALCULATIONS:

- 1 Establish drainage area

	Bottom Ash Pond
A_d (ac)	45.4
A_d (mi ²)	0.071

Measured in Microstation, see SK-CIVIL-001 in Appendix A. Area delineated using contours generated from the LSU Atlas Lidar.
 Conversion from ac to mi²

- 2 Establish rainfall data (assume SCS Type III distribution)

SCS Storm	Depth (in)
1000yr, 24hr	22.6

Reference 3

- 3 Establish CN, percent impervious cover, and initial abstraction. Assume antecedent moisture condition (AMC) II - average conditions.

Land Description	Bottom Ash Pond		
	CN _i *	A _i ** (ac)	CN _w
Open space, fair condition	69	12.7	19
Open space, poor condition (ash)	86	16.3	31
Pond	100	16.3	36
A_T (ac)		45.4	
CN_{WT}			86
S (in)			1.63
I_a (in)			0.326

Equation 10

Equation 10

Equation 10

Sum

Sum

Equation 8

Equation 9

*Reference 1, Table 20.4, p. 20-17 and Assumptions 4 & 5

**Measured in Microstation, see SK-CIVIL-002 in Appendix A. Adjusted ash area based on Assumption 4.

4 Establish Time of Concentration and Basin Lag time for SCS Unit Hydrograph Transform

Subbasin	Bottom Ash Pond	
Sheet Flow		
n	0.13	Reference 1, p. 20-3, Table 20.1 - range (natural)
L (ft)	300	Measured in Microstation, see SK-CIVIL-002 in Appendix A
P ₂ (in)	5.13	Reference 3, 2yr 24hr rainfall
S _{decimal} (ft/ft)	0.01	Assumed 1% slope across ash
t _{sheet} (hrs)	0.37	Equation 2
t _{sheet} (min)	21.93	Conversion from hrs to min
Shallow Flow		
S _{decimal} (ft/ft)	0.01	Assumed 1% slope across ash
V _{shallow} (ft/s)	1.00	Reference 4, Figure 15-4
L* (ft)	538	Measured in Microstation, see SK-CIVIL-002 in Appendix A
t _{shallow} (s)	538.00	Equation 3
t _{shallow} (min)	8.97	Conversion from s to min
Time of Concentration		
t _c (min)	30.90	Equation 6
Lag Time		
t _{lag} (min)	18.54	Equation 7

5 Run HEC-HMS with input parameters: all discharge into ponds (rainfall + sluice flow @ 2.16 MGD, 12 hr/day) is additional flow above normal operating level (EL 94) with sluicing operations are maintained over the duration of the storm event control period. Elevation-area data for the pond is as noted below.

EL	area* (ac)
94	16.3
95	16.5
96	16.7
97	16.8
98	17.0
99	17.1
100	17.3
101	17.5
102	17.6
103	17.8
104	18.0
105	18.2

*Measured in Microstation and adjusted based on pond being 50% full of ash

RESULTS:

Component	Subbasin		Reservoir				
	Peak Discharge (cfs)	Runoff Volume (in)	Initial EL*	Peak Inflow (cfs)	Peak Discharge (cfs)	Peak Elevation (ft)	Peak Storage** (ac-ft)
Bottom Ash Pond	555.6	20.76	94.0	559.0	0.0	100.5	109.7

*Assumed based on pump operation info provided by Owner

**Peak storage reflects storage above initial EL

CONCLUSION:

Under the modeled conditions, the Bottom Ash Pond can accept inflows from the design flood event and sluicing operations without overtopping.



CREATE AMAZING.

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