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2023 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Big Cajun II Power Plant

New Roads, Pointe Coupee Parish, Louisiana

Prepared for

Cleco Cajun, LLC
10431 Cajun II Road, Highway 981
New Roads, Louisiana 70760

Prepared by

Geosyntec Consultants, Inc.
2600 CitiPlace Court, Suite 500
Baton Rouge, Louisiana 70808

Project Number TXR9160B

December 2023

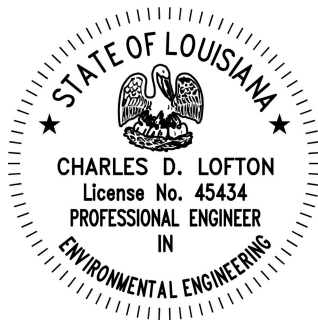
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Figure 1: Site Plan

1. INTRODUCTION

This 2023 Annual CCR Fugitive Dust Control Report (“Report”) was prepared for Cleco Cajun, LLC, a subsidiary of Cleco Corporate Holdings, LLC. (“Cleco”), Big Cajun II Power Plant (Facility) pursuant to the air criteria requirements of Section (§) 257.80 of the Federal Coal Combustion Residuals (CCR) Rule (the CCR Rule) contained in Title 40 Code of Federal Regulations (CFR) Part 257.

Under 40 CFR §257.80, the Facility must adopt measures that will effectively minimize CCR from becoming airborne onsite, which includes CCR fugitive dust that originates from CCR units, roads, and other CCR management and material handling activities. The measures employed to minimize fugitive dust migration are identified and described within the Facility’s CCR Fugitive Dust Control Plan (“Plan”) (CB&I, 2015). The Plan was previously placed into the Facility Operating Record, and Cleco personnel conduct site CCR management operations in accordance with the Plan.

In accordance with the CCR Rule, this Report:

- describes the actions taken by the operator to control CCR fugitive dust;
- provides a record of all citizen complaints (if any); and
- summarizes implemented corrective measures (if any).

Geosyntec Consultants, Inc. (“Geosyntec”) understands that the 2016 Annual CCR Fugitive Dust Control Report (CB&I, 2016) was placed into the Operating Record on 19 December 2016. Subsequent annual reports were placed into the Operating Record on 19 December 2017, 19 December 2018, 19 December 2019, 19 December 2020, 19 December 2021, and 19 December 2022 (Geosyntec, 2017; Geosyntec, 2018; Geosyntec, 2019; Geosyntec, 2020; Geosyntec, 2021; Geosyntec, 2022). The completion deadline for a subsequent annual report is one year after the completion date of the previous annual report. An annual report is considered complete once the document is placed within the Operating Record. Therefore, this Report was developed to address the period between 19 December 2022 and its issuance date of 19 December 2023 and is intended to be placed in the Operating Record upon issuance.

To prepare this Report, Geosyntec reviewed the Plan, the 2016 through 2022 Annual CCR Fugitive Dust Control Reports (CB&I, 2016; Geosyntec, 2017; Geosyntec, 2018; Geosyntec 2019; Geosyntec 2020; Geosyntec, 2021; Geosyntec 2022), and available 2023 fugitive dust inspection logs. Geosyntec also visited the facility on 24 October 2023 to: (i) review and observe site features and CCR management procedures; (ii) inquire about any citizen complaints received or corrective actions made during the current record period; and (iii) discuss operations with the environmental coordinator who is responsible for on-going CCR fugitive dust control inspections and overall Plan implementation. This Report was reviewed by the Facility’s environmental coordinator to confirm the accuracy of the information presented herein.

2. FUGITIVE DUST CONTROL MEASURES

The following sections provide details on the background (i.e., history) of the Facility and Fugitive Dust Control Measures which are in place at the Facility.

2.1 Facility Background

The Facility is a coal and natural gas-fired, steam turbine electric power generation facility located on 1,939 acres northeast of New Roads, Louisiana. Big Cajun II is currently owned and operated by Cleco Cajun, LLC, a subsidiary of Cleco, and has operated for over 30 years. A site map showing relevant Facility areas associated with CCR management is presented on Figure 1. A description of the processes related to CCR generation and management is provided below.

Coal is delivered to the Facility via barge on the Mississippi River to a dock located east of the Facility. The coal is unloaded onto a conveyor belt which transports the material to a storage area north of the boiler units (Figure 1). The Facility has three boiler units. Boiler Units 1 and 3 use coal as the primary fuel source, which generate CCR material (i.e., fly ash and bottom ash). Boiler Unit 2 was previously converted to use natural gas as the primary fuel source and no longer generates CCR.

Fly ash generated by Unit 1 and Unit 3 is pneumatically transported to storage silos and is subsequently transported off-site for beneficial reuse or disposal. As market demand dictates, fly ash within the Fly Ash Basin is removed and sold to external vendors.

Bottom ash generated by the Facility is collected within hoppers at the base of the Boiler Units 1 and 3. The bottom ash in the Boiler Unit 1 hopper is transported hydraulically (i.e., sluiced) via pipe into the on-site Bottom Ash Basin. The bottom ash in the Boiler Unit 3 hopper is transported off-site for beneficial reuse or disposal.

2.2 Fugitive Dust Control Measures

Control measures are required to effectively prevent airborne transfer of CCR fugitive dust that originates from CCR units, roads, and other CCR management and material handling activities at the Facility. Consistent with the Plan, the following CCR fugitive dust control measures were implemented by Facility personnel at the potential CCR fugitive dust sources during the period addressed within this Report.

2.2.1 Fly Ash Handling Practices

The fly ash storage silos are equipped with a baghouse to capture CCR fugitive dust during transfer of fly ash from the boiler units into the Boiler Units 1 and 3 storage silos. Most of the fly ash is transported from each silo with closed pneumatic tank trucks. A delivery chute is lowered from the base of each silo to transfer dry fly ash into the fill opening of the closed tanker truck. Fugitive dust generated during the truck filling process is captured using a fly ash unloading area blower. When open top trucks are used, (i) the trucks are not filled to full capacity (i.e., some freeboard is maintained in the truck); and (ii) the trucks are tightly covered with a tarp during transport to an off-site location.

2.2.2 Bottom Ash Handling Practices

Bottom ash from Boiler Unit 1 is transported hydraulically through a pipe and sluiced directly to the Bottom Ash Basin, which does not produce fugitive dust due to: (i) the high water content of the sluiced bottom ash and (ii) the bottom ash travels through an enclosed pipe. Bottom ash from Boiler Unit 3 is collected in hoppers after which the damp material is hauled via covered dump trucks to an off-site location.

2.2.3 Transport Roads

Site roads used to transport CCR materials are evaluated by Facility personnel and watered using a water truck, as-needed, when the observed surface dryness is susceptible to dust migration. Fugitive dust emissions are also controlled with strict observation of a 15 mile per hour maximum vehicle speed limit for all site roads. Paved roads and parking lots are also periodically swept during routine maintenance activities.

2.2.4 Surface Impoundments

The Facility maintains surface water within each impoundment which limits the potential for dust migration for submerged areas. In addition, access roads in and around the CCR surface impoundments are evaluated and watered when surface conditions indicate the potential for dust migration.

3. CITIZEN COMPLAINTS AND CORRECTIVE MEASURES

The following sections provide details on documenting citizen complaints and appropriate corrective measures in response to citizen complaints.

3.1 Citizen Complaints

Per the Plan (CB&I, 2015), citizen complaints that involve fugitive dust events at the Facility are logged in the Facility's Environmental Management Information System (EMIS) database within 24 hours of complaint receipt. The EMIS automatically forwards the complaint to the facility manager, Cleco's regional environmental coordinator, and Cleco's Corporate Environmental Department.

No citizen complaints were received during the period addressed by the 2023 Annual Report.

3.2 Corrective Measures

Per the Plan (CB&I, 2015), if a citizen complaint is received: (i) Cleco will conduct a thorough investigation; (ii) record and enter the investigation results into the EMIS database; and (iii) communicate the investigation results to the appropriate parties. If an investigation confirms a fugitive dust emission event, Cleco will conduct a root cause analysis to address the source of the excess fugitive dust and will develop a plan to mitigate future occurrences and remediate impacts, as necessary.

No corrective measures were necessary during the period addressed by the 2023 Annual Report.

4. ASSESSMENT OF PLAN EFFECTIVENESS

Per the procedures set forth in the Plan (CB&I, 2015) and consistent with 40 CFR §257.80, the Plan will be periodically reviewed by the Facility's environmental coordinator and assessed to evaluate the Plan's effectiveness to provide the appropriate procedures and methods for minimizing CCR from becoming airborne at the Facility. The Plan review will serve to either confirm the Plan's effectiveness or identify sections which necessitate revision to reflect any relevant changes in plant or CCR unit operations or necessary improvements in CCR fugitive dust control protocols. The Plan must be amended whenever there is a change in conditions that substantially affects the Plan, such as the construction and operation of a new CCR unit.

No new CCR units were commissioned, and no new CCR management operations or processes were implemented. Excavation and removal of material from the fly ash basin is ongoing. Transportation of excavated material from the fly ash basin was performed in accordance with the fugitive dust control measures identified in Sections 2.2.1, 2.2.3, and 2.2.4. No other modifications to existing CCR management operations or processes were revised that necessitated a change in the Plan. In addition, no citizen complaints were received, and no corrective measures were taken with regards to CCR fugitive dust control. No actions outside of the normal CCR fugitive dust control measures were required. As part of the review process before issuance of this Report, the Facility's environmental coordinator identified that no additional or modified CCR fugitive dust control measures are warranted at this time.

5. RECORDKEEPING, NOTIFICATION, INTERNET REQUIREMENTS

5.1 Recordkeeping Requirements

In accordance with 40 CFR §257.105(g), the Plan (CB&I, 2015), any subsequent amendment of the Plan, Annual CCR Fugitive Dust Control Reports, and related information will be kept in the Facility Operating Record. The appropriate documents will be maintained in the Operating Record for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, record, or study – except that only the most recent Plan must be maintained in the Operating Record.

The Facility is regularly monitored for CCR fugitive dust conditions and emissions. Should CCR fugitive dust emissions occur, the Facility will document the incident in accordance with the Plan, including detailing the corrective measures taken to reduce the fugitive dust. The incident log (if any) will also be included in the next annual report. No CCR fugitive dust conditions were observed by Facility personnel during the period addressed by this Report.

5.2 Notification Requirements

In accordance with 40 CFR §257.106(g), the State Director of the Louisiana Department of Environmental Quality (LDEQ) will be notified once this Annual CCR Fugitive Dust Control Report is placed in the Operating Record and on the publicly accessible internet site.

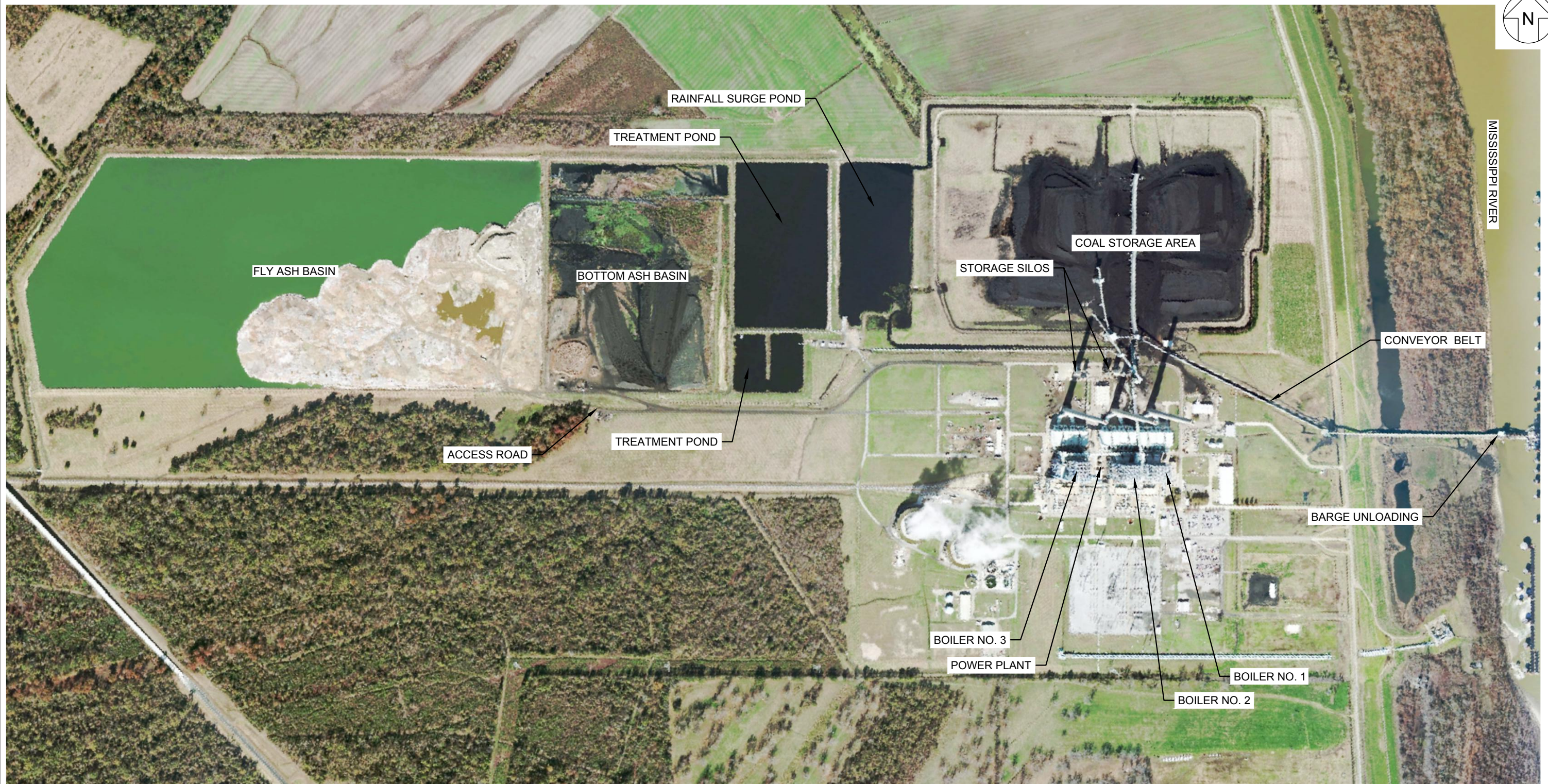
5.3 Internet Requirements

In accordance with 40 CFR §257.107(g), the most recent Annual CCR Fugitive Dust Control Report will be made available on the Facility's publicly accessible internet site within 30 days of it being placed in the Operating Record.

6. REFERENCES

- CB&I Environmental & Infrastructure, Inc. (CB&I). CCR Compliance – Fugitive Dust Control Plan. Louisiana Generating, LLC, Big Cajun II. October 2015.
- CB&I. CCR Compliance – Annual Fugitive Dust Control Report. Louisiana Generating, LLC, Big Cajun II. December 2016.
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- Geosyntec. Annual Fugitive Dust Control Report. Louisiana Generating, LLC, Big Cajun II, December 2019.
- Geosyntec. 2020 Annual Fugitive Dust Control Report. Louisiana Generating, LLC, Big Cajun II, December 2020.
- Geosyntec. 2021 Annual Fugitive Dust Control Report. Louisiana Generating, LLC, Big Cajun II, December 2021.
- Geosyntec. 2022 Annual Fugitive Dust Control Report. Louisiana Generating, LLC, Big Cajun II, December 2022.

FIGURE



NOTE:

1. AERIAL PHOTO SOURCE: BING MAPS, MICROSOFT CORPORATION, 2017 .
2. LEGEND AND LOCATION OF CCR OPERATIONAL FEATURES TAKEN FROM OCTOBER 2016 STRUCTURAL INTEGRITY ASSESSMENT REPORT BY CB&I ENVIRONMENT & INFRASTRUCTURE, INC.



<p>SITE PLAN BIG CAJUN II POWER PLANT 10431 CAJUN II ROAD NEW ROADS, LA 70760</p>	
	<p>FIGURE 1</p>
<p>BATON ROUGE, LA</p>	<p>DECEMBER 2023</p>

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