

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



CCR COMPLIANT FUGITIVE
DUST CONTROL PLAN

ASH MANAGEMENT LANDFILL
CELL 4

AGENCY INTEREST NO. 2922

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

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REVISION LOG

Revision No.	Revision Date	Revised Section(s)	Notes
A	October 2015	N/A	Original publication
B	August 2023		Incorporation of conversion of Fly Ash Pond closure into landfill footprint
C	December 2023		Addition of Cell 4

TABLE OF CONTENTS

<u>Section</u>		<u>Page</u>
1.0	INTRODUCTION	1
2.0	PLAN OBJECTIVES	1
3.0	FUGITIVE DUST SOURCES AND CONTROLS	1
3.1	Bottom Ash/Economizer Ash Handling	2
3.2	Fly Ash Handling.....	2
3.3	CCR Landfill	3
3.4	Haul Roads.....	3
3.5	CCR Impoundments.....	4
4.0	PROCEDURES FOR LOGGING CITIZEN COMPLAINTS.....	5
5.0	PERIODIC ASSESSMENT OF THE PLAN	5
6.0	ANNUAL REPORT	5

LIST OF TABLES

<u>Table</u>		
1	CCR Fugitive Dust Sources	2
2	Fly Ash Handling Control Measures.....	3
3	CCR Landfill Control Measures.....	3
4	Haul Roads Control Measure.....	4
5	CCR Impoundment Control Measures.....	4

LIST OF APPENDICES

Appendix

- A Citizen Compliant Log
- B 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 257.80(b).

Per 40 CFR §257.80(b)(7), Cleco must obtain certification from a qualified professional engineer that the fugitive dust control plan meets the requirements of 40 CFR 257.80(b) and is included in **Appendix B**.

This CCR Fugitive Dust Control Plan is in addition to, not in place of, any other applicable site permits, environmental standards, or work safety practices.

2.0 PLAN OBJECTIVES

The Fugitive Dust Control Plan identifies Cleco control measures and practices to minimize and control fugitive dust as required by the CCR Rule. The plan defines the ways in which Cleco personnel and subcontractors will mitigate CCR dust emissions at the plant.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies potential CCR fugitive dust sources at the facility.
- Identifies control measures and practices to control and minimize CCR fugitive emissions.
- Identifies CCR fugitive dust control recordkeeping requirements.
- Identifies CCR fugitive dust control notification requirements.

3.0 FUGITIVE DUST SOURCES AND CONTROLS

Cleco operates Rodemacher Unit 2 (523 MW) near Lena, Louisiana in Rapides Parish. Coal combustion residuals produced at Rodemacher Unit 2 include fly ash, bottom ash, and economizer ash, which are currently utilized for beneficial use, disposed of, or stored in the onsite impoundments and landfill cell. In addition to the controls outlined in this plan, Cleco adheres to controls and Best

Management Practices that are required and outlined in site permits and plans. Cleco also holds subcontractors responsible for fugitive dust control emissions.

Table 1 lists the potential fugitive dust sources identified as part of the CCR handling at the facility, briefly describing operations at each potential source.

**TABLE 1
CCR FUGITIVE DUST SOURCES**

Source Name	Description
Bottom Ash/Economizer Ash Handling	Sluiced to a CCR impoundment
Fly Ash Handling	Enclosed collection and pneumatic transport to silo; Normally processed through the ash conditioner to hydrate prior to transport to the landfill. Ceased placing waste in the fly ash pond on April 11, 2021. Any unsold material is now placed in Cell 4.
CCR Landfill	Truck unloading/material placement/compaction/grading
Haul Roads	Transport road from the plant site to the CCR impoundment
CCR Impoundments	Disposal/storage area for CCR materials

3.1 Bottom Ash/Economizer Ash Handling

Bottom ash and economizer ash are handled wet and sluiced to a CCR impoundment onsite. Since the ash is sluiced in a wet condition via pipeline to the site impoundment, there are no potential fugitive dust sources in the handling of bottom/economizer ash at the site, both at the generation point of the ash and at the slurry discharge point into the CCR impoundment. Dust control measures at the impoundment are discussed in Section 3.4.

3.2 Fly Ash Handling

Fly ash is pneumatically transported from both the precipitator and the fabric filter (baghouse) and stored temporarily in a fly ash silo or byproducts silo. Ceased placing waste in the fly ash pond on April 11, 2021. Any unsold material is now placed in Cell 4. The ASTM C-618 quality Class C fly ash from the precipitator is generally loaded dry from the fly ash silo into enclosed trucks and transported offsite for beneficial use. Fly ash from the fabric filter that does not meet the Class C specification is sent from the byproducts silo to the pug mill where it is conditioned, loaded into haul trucks and transported to the fly ash impoundment for disposal. Fly ash that will be stored onsite prior to beneficial use is transported to the fly ash pond and is further conditioned by water trucks as necessary to control fugitive dust emissions. Dust control measures are described in Table 2.

**TABLE 2
FLY ASH HANDLING CONTROL MEASURES**

Control/Activity	Description
General Silo Controls	Storage silo is equipped with a bin vent filter.
Dry Loading for Reuse	The dry loading process includes a telescopic chute that lowers into tanker trucks to minimize material fall distance. The loading chute has over-suction to prevent fugitive dust emissions during unloading. Trucks are enclosed.
Landfill Disposal	Fly ash that is not suitable for reuse is conditioned by mixing water and the ash in a pug mill and is transported and unloaded into the CCR impoundment. Fly ash that is suitable for reuse that will be stored prior to reuse is loaded as noted above and transported to the impoundment in an enclosed tanker type truck. The trucks transporting the ash are equipped with dust curtains and watering systems at the unloading point to wet the ash as it is placed within impoundment to prevent fugitive dust emissions.

3.3 CCR Landfill

CCR materials are hauled from the ash silo area to the CCR landfill for disposal. Dust Control measures are described in **Table 3**.

**TABLE 3
CCR LANDFILL CONTROL MEASURES**

Control/Activity	Description
Grading/Construction	The conditioned CCR Fly ash is hauled to the landfill for disposal. The product is partially hydrated in the in the pug mills prior to transport. If product dries it will be rewetted with Bottom Ash Pond water during placement.

3.4 Haul Roads

The plant has a haul road connecting the plant to the CCR impoundment site. Haul trucks utilize the haul road to transport CCR materials to the impoundment. Dust control measures are described in **Table 4**.

TABLE 4

HAUL ROADS CONTROL MEASURE

Control/A	Description
Haul Roads	Haul roads within the plant are paved; this minimizes fugitive dust generation during transport. Haul roads to the CCR impoundments from the plant are gravel and are treated with water trucks for fugitive dust control. Haul roads also have low speed limit signs posted to lower potential for fugitive dust emissions.
Haul Trucks	All fly ash haul trucks are tanker type and are enclosed. Other trucks hauling to the CCR impoundments are carrying conditioned ash with moisture content suitable for minimizing fugitive dust emissions.

3.5 CCR Impoundments

Bottom and Economizer ash is sluiced to a CCR impoundment. Fly ash is hauled to a separate CCR impoundment. Dust control measures are described in Table 5.

TABLE 5

CCR IMPOUNDMENT CONTROL MEASURES

Control/Activity	Description
Wet Sluicing – Bottom/ Economizer Ash	CCR material is sluiced in a wet condition and placed in the impoundment. There are no fugitive dust emissions issues near the bottom ash impoundment. Should fugitive dust become a concern as ash dries on the perimeter of the impoundment, water trucks will be used to further wet any ash that may pose an issue during especially high wind events.
Placing Unconditioned Fly Ash	Unconditioned fly ash is hauled to the impoundment in an enclosed tanker type haul truck. The trucks are equipped with dust curtains and a watering system at the unloading point to condition the material during unloading. Should fugitive dust become a concern as ash dries on the perimeter of the impoundment, water trucks will be used to further wet any ash that may pose an issue during especially high wind events.
Placing Conditioned Fly Ash	Material is conditioned by mixing water and the ash in the pug mill at the byproducts silo, and is then placed in the impoundment. Should fugitive dust become a concern as ash dries on the perimeter of the impoundment, water trucks will be used to further wet any ash that may pose an issue during especially high wind events.

4.0 PROCEDURES FOR LOGGING CITIZEN COMPLAINTS

A specific requirement of the CCR Fugitive Dust Control Plan requires owners and operators of all CCR units to develop and implement formal procedures to log citizen complaints involving CCR fugitive dust events. These complaints must, then, be included as part of the annual CCR fugitive dust control report. This report must be placed in the operating record and on the owner or operator's publicly accessible internet site.

Cleco will log citizen complaints as received on the log form in **Appendix A**.

Citizens, groups, or agencies who wish to log a complaint may do so at the following link: <https://fs21.formsite.com/Cleco/ClecoDustConcerns/index.html>

Complaints can also be submitted in writing to the plant address at:

275 Rodemacher Rd.,
Lena, LA 71447,
Attn: Environmental Coordinator

5.0 PERIODIC ASSESSMENT OF THE PLAN

Cleco may amend the written CCR Fugitive Dust Control Plan at any time; however, Cleco must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit. The plan and any subsequent amendments must be certified by a qualified professional engineer.

Cleco commits to assessment of the plan, at a minimum, on an annual basis, during preparation of the annual CCR Fugitive Dust Control Report.

6.0 ANNUAL REPORT

Cleco is required to prepare an annual CCR Fugitive Dust Control Report that includes:

- A description of the actions taken by the owner or operator to control CCR fugitive dust,
- A record of all citizen complaints, and
- A summary of any corrective measures taken.

The initial annual report must be completed no later than 14 months after placing the initial CCR Fugitive Dust Control Plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. The annual CCR Fugitive Dust Control Report is complete when the plan has been placed in the facility's operating record.

APPENDIX A
CITIZEN COMPLAINT LOG

Brame Energy Center – CCR Fugitive Dust Complaint Log

Date	Plaintiff Location, Group, or Affiliation	Nature of Complaint	Action Taken to Mitigate Fugitive Emissions

APPENDIX B
CERTIFICATION

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CERTIFICATION

I certify that this Fugitive Dust Control Plan fulfills the minimum requirements of 40 CFR 257.80(b)(1) – (7), as applicable. This certification is based on my review of the Cleco Brame Fugitive Dust Control Plan and operational information about the CCR units.

Gary J. Leonards, P.E.

Name

30568

Louisiana

Registration No.

State

Signature

Date

12/29/23



(Seal)