

US EPA ARCHIVE DOCUMENT



Cleco Corporation
2030 Donahue Ferry Rd
P. O. Box 5000
Pineville, LA 71361-5000

May 14, 2009

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

RE: Rodemacher Power Station – Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e).

Dear Sir:

The United States Environmental Protection Agency has requested information from facilities relating to the surface impoundments or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by products from combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag or flue gas emission control residuals. A full and complete response to the information request is attached.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions for this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,

Steve Carter
Vice President – Regulated Generation

Information for source:
Cleco Power, LLC
Rodemacher Power Station
Lena, LA
Fly Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less than Low Hazard Potential, please provide the rating for each management unit.

Response: No rating currently available.

Indicate who established the rating.

Response: No rating currently available.

What was the basis of the rating.

Response: No rating currently available.

What federal or state agency regulates the unit(s).

Response: Louisiana Department of Environmental Quality

If the unit(s) does not have a rating, please note that fact.

Response: No rating currently available

2. What year was each management unit commissioned and expanded?

Response: 1982

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: Fly ash and water.

4. Was the management unit(s) designed by a Professional Engineer?

Response: yes

Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer?

Response: yes

Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: No

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)?

Response: A structural integrity evaluation took place on March 25, 2009. In addition, the impoundment is visually examined daily for indications of issues as required by the impoundment Solid Waste permit.

Briefly describe the credentials of those conducting the structural integrity assessments/evaluations.

Response: The March 25, 2009 inspection was conducted by TRC Engineers, Inc. TRC is an infrastructure, environmental, and energy engineering services company with more than 2,600 employees in 70 offices nationwide. TRC provides services in bridge design and inspections, transportation design and rehabilitation, civil works, construction engineering and inspection as well as environmental services to federal, state and local agencies as well as private sector clients. The daily impoundment inspections are conducted by Power plant operators.

Identify actions taken or planned by facility personnel as a result of these assessments or evaluations.

Response: No actions taken or currently planned.

If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors.

Response: No actions taken.

If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: None currently planned other than daily inspections by operators.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)?

Response: October 24, 2007

If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?

Response: The date of the next inspection has not been provided.

Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.

Response: Louisiana Department of Environmental Quality

Please provide a copy of the most recent official inspection report or evaluation.

Response: Inspection report attached.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: No issues were identified.

8. What is the surface area (acres) and total storage capacity of each of the management units?

Response: 109 acres/1,560 acre-feet

What is the volume of materials currently stored in each of the management unit(s)?

Response: 1,081,498 cubic yards

Please provide the date that the volume measurement(s) was taken.

Response: May 9, 2009

Please provide the maximum height of the management unit(s).

Response: 22.5 ft

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include groundwater).

Response: No known spills/releases have occurred.

10. Please identify all current legal owners(s) and operator(s) at the facility.

Response: Jointly owned by Cleco Power, Louisiana Energy and Power Authority, and Lafayette Utilities System LLC
Operator – CLECO Power LLC

Information for source:
Cleco Power, LLC
Rodemacher Power Station
Lena, LA
Bottom Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less than Low Hazard Potential, please provide the rating for each management unit.

Response: No rating currently available.

Indicate who established the rating.

Response: No rating currently available.

What was the basis of the rating.

Response: No rating currently available.

What federal or state agency regulates the unit(s).

Response: Louisiana Department of Environmental Quality

If the unit(s) does not have a rating, please note that fact.

Response: No rating currently available

2. What year was each management unit commissioned and expanded?

Response: 1982

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: Bottom ash and sluice water

4. Was the management unit(s) designed by a Professional Engineer?

Response: yes

Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer?

Response: yes

Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: No

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)?

Response: A structural integrity evaluation took place on March 25, 2009. In addition, the impoundment is visually examined daily for indications of issues as required by the impoundment Solid Waste permit.

Briefly describe the credentials of those conducting the structural integrity assessments/evaluations.

Response: The March 25, 2009 inspection was conducted by TRC Engineers, Inc. TRC is an infrastructure, environmental, and energy engineering services company with more than 2,600 employees in 70 offices nationwide. TRC provides services in bridge design and inspections, transportation design and rehabilitation, civil works, construction engineering and inspection as well as environmental services to federal, state and local agencies as well as private sector clients. Daily inspections are conducted by Power plant operators.

Identify actions taken or planned by facility personnel as a result of these assessments or evaluations.

Response: No actions taken or currently planned.

If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors.

Response: No actions taken.

If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: None currently planned other than daily inspections by operators.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)?

Response: October 24, 2007

If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?

Response: The date of the next inspection has not been provided.

Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.

Response: Louisiana Department of Environmental Quality

Please provide a copy of the most recent official inspection report or evaluation.

Response: Inspection report attached.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: No inspection was conducted by State or Federal officials during the past year.

8. What is the surface area (acres) and total storage capacity of each of the management units?

Response: 36 acres/740 acre-feet

What is the volume of materials currently stored in each of the management unit(s)?

Response: 1,033,824 cubic yds

Please provide the date that the volume measurement(s) was taken.

Response: May 9, 2009

Please provide the maximum height of the management unit(s).

Response: 29.1 ft

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include groundwater).

Response: No known spills/releases have occurred.

10. Please identify all current legal owners(s) and operator(s) at the facility.

Response: Jointly owned by Cleco Power, Louisiana Energy and Power Authority, and Lafayette Utilities System LLC
Operator – CLECO Power LLC