Comments

EPA:

Page 4 – Be consistent when identifying owner. Primary owner seems to be Cleco, not AEP-SWEPCO. Cleco responded to EPA's survey, according to Page 3.

Need to indicate when all the units were constructed in their descriptions.

State:

The Louisiana Dam Safety Program would like to offer the comments below for inclusion into the report:

- Please note under State Issued Permits – *For those impoundments that fall under the Louisiana Dam Safety Program (http://www.dotd.la.gov/intermodal/dams/rs38.aspx) Louisiana Revised Statue 38:25.A. Where the impoundment of liquid substances or hazardous wastes and materials by dikes, dams, or barriers is permitted or regulated under the Department of Natural Resources, that office shall adopt rules and regulations for the construction, operation and maintenance of said facilities in accordance with the requirements, rules and regulations promulgated under this Chapter and such impoundments are exempted from the provisions of this Chapter.*

  Please note that these former Department of Natural Resources' responsibilities related to waste now belong to the Louisiana Department of Environmental Quality.

- Although the report includes design standards, hydrologic design criteria and stability factor of safety standards, from the federal administration, it does not cite state standards. *The Louisiana Dam Safety Program design standards found in Louisiana Administrative Code Title 56, Part III, Chapter7,* http://www.dotd.la.gov/intermodal/dams/Regulations.aspx, *should be included in the appropriate table.*

If I can be of any further assistance, please feel free to contact me.

Stephen Tassin, P.E.
Dam Safety Program
LADOTD, Office of Public Works
P. O. Box 94245
Baton Rouge, LA 70804
Office: 225-274-4185

Company: See letter dated February 23, 2011

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

February 23, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Comments to the November 2010 AMEC Draft Assessment Report
Dolet Hills Power Station, Mansfield, LA
AMEC Project No. 3-2106-0183.0004

Dear Mr. Hoffman:

We appreciate the opportunity to review and comment on this draft report. We are not asserting a business confidentiality claim for these comments or the final report.

The formatting of our comments will be the quote from the draft report in italics followed by our comments.

Section 1.4 Ash Ponds

Information regarding the FlyAsh/FGD Landfill Pond was not included in Cleco's response to EPA's Request for Information. However, provided documentation notes this pond receives stormwater runoff from the Landfill; therefore, this pond would contain traces of bottom ash, fly ash and FGD sludge. Information regarding the involvement of a professional engineer with the design, construction, and inspection and monitoring of the pond prior to 2009 was not provided.

The original design and construction details were included in the November 14, 1985 original permit application submitted by Waldemar S. Nelson and Co., and were approved by a professional engineer.

Section 1.4.1 Ash Ponds

AEP-SWEPCO Corporation's March 24, 2009 response to the EPA's request for information, as well as recent communications with Cleco personnel, provided the following information.

The March 24, 2009 response was from Cleco Power, LLC.

Section 1.4.2 Surge Ponds

The Auxiliary Surge Pond has a surface are of 1.54 acres and a storage capacity of 0.35 acre-feet (565 CY).

The surface area of the Auxiliary Surge Pond is 0.35 acres and the storage capacity is 1.54 acre-feet (2,484 CY).

Also, based on visual observations, there is less material present in the surge ponds than is permitted. The information presented to the EPA in April 2009 was based on the information that we had available at that time.

3.5.2 Annual Safety Assessments

<u>2010 Safety Assessment</u>

The landslides located on the inner slopes of the Auxiliary Ash Pond, reported in the 2009 Safety Assessment, were noted to have been repaired.

The pond indicated in this reference should be the Secondary Surge Pond.

Appendix A

The inspection report for the Ash Basin No. 2 indicates past significant seepage when the slope investigations in the past were for Ash Basin No. 1.

If you have any questions or need additional information, please contact me at (318) 484-7742.

Sincerely,

Brent Croom
Manager Waste & Water