Cleco Corporation
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Pineville, LA 71361-5000

August 29, 2011

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

RE: Response to the May 4, 2011 AMEC Assessment Report Titled: "Report of Dam Safety Assessment of Coal Combustion Surface Impoundments" Dolet Hills Power Station

Dear Mr. Hoffman:

Our responses to the recommendations in Enclosure 2 of your letter dated July 28, 2011 are included in the attachment.

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

Sincerely,

Brent Croom
Manager Waste & Water

4.2.1 Hydrologic and Hydraulic

Ash Ponds 1 and 2:

Further review of the originally provided hydrologic documentation for the Ash Ponds (1, 2, and Secondary) showed that Ash Ponds 1 and 2 appear to be able to contain runoff from the 50- year 24-hour rainfall events and send excess runoff from larger rainfall events into the Secondary Pond. Reference to maintenance of a two foot freeboard with the capacity to pass the 100-year 24-hour rainfall event was also described for these two ponds.

AMEC recommends that detailed calculations be completed to provide documentation in support of the "Specifications" described above as well as in Table 5 of the final Assessment report.

Secondary Ash Pond:

AMEC recommends that detailed calculations be completed to provide clear and concise documentation in support of the relationship between all three Ash Ponds and the "Specifications" described in Table 6 of the final Assessment report for the Secondary Ash Pond.

Surge Ponds 1 and 2, and Fly Ash/FGD Landfill Pond:

AMEC recommends that an appropriate design storm rainfall and freeboard depth in accordance with MSHA guidelines be applied to each impoundment's watershed to assess whether the dam and decant system can safely store, control, and discharge the design flow. Based on the size and rating for the ponds, the design storm would be the 100-year, 24-hour event. Hydraulic calculations should also be completed to determine the rate at which the discharge system could pass the design storm, if necessary, or draw down elevated water surfaces following such an event. The analysis should consider all critical stages over the life of the pond including full pond conditions.

Response:

Cleco will complete a hydrologic and hydraulic evaluation for the above listed facilities. We expect to complete these tasks by December 31, 2011.

4.2.2 Geotechnical and Stability

Surge Ponds 1 and 2, and Fly Ash/FGD Landfill Pond:

AMEC recommends that complete geotechnical and stability studies be completed for these ponds.

Response:

Cleco will complete the above mentioned geotechnical and stability studies. We expect to complete this task by March 31, 2012.

4.2.3 Monitoring and Instrumentation

Any environmental sampling of the monitoring wells within the zone of influence of the impoundment structures should include groundwater elevation readings. These readings should be reviewed at least annually by a Professional Engineer.

Response:

Cleco will continue monitoring the groundwater levels within the zone of influence of the applicable impoundments. This is an ongoing activity that we will continue.

4.2.4 Inspection Recomendations

Annual visual inspections of each management unit should be performed by a Professional Engineer. Inspection reports should be maintained by the facility. Additionally, daily inspections performed by facility O&M personnel should be supported by an inspection checklist that could also serve as documentation of the inspection.

Vegetation on the impoundments should continue to be aggressively managed. We further recommend that vegetation be managed based on guidance in (a) Corps of Engineers EM 1110-2-301, Guidelines for Landscape Planting and Vegetation Management at Floodwalls, Levees, and Embankment Dams and (b) FEMA 534, Technical Manual for Dam Owners: Impacts of Plants on Earthen Dams. Additionally, animal impact should be mitigated based on guidance in FEMA 473, Technical Manual for Dam Owners: Impacts of Animals on Earthen Dams.

Response:

We will utilize a Professional Engineer to inspect these facilities annually. We will complete this task by December 31, 2011.

Vegetation and animal impact management is an on-going maintenance activity which Cleco will continue.