

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

CLECO POWER LLC

AI # 83623

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT  
LA. R.S. 30:2001, ET SEQ.

\* Settlement Tracking No.  
\* SA-AE-19-0096  
\*  
\* Enforcement Tracking No.  
\* AE-CN-15-00204  
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SETTLEMENT

The following Settlement is hereby agreed to between Cleco Power LLC (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a limited liability company that owns and/or operates a fossil-fueled steam electric generator facility located in Eunice, Acadia Parish, Louisiana (“the Facility”).

II

On September 20, 2017, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-15-00204 (Exhibit 1).

III

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

IV

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount

of FOUR THOUSAND AND NO/100 DOLLARS (\$4,000.00), of which Seven Hundred Fifty-Nine and 67/100 Dollars (\$759.67) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

Respondent further agrees that the Department may consider the inspection report(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VI

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

## VIII

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

## IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Acadia Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

## X

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

## XI

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

## XII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

**CLECO POWER LLC**

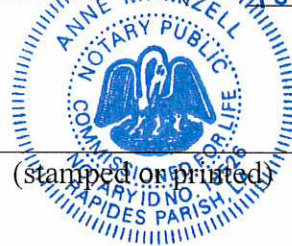
BY: *Russ Snyder*  
(Signature)

RUSS SNYDER  
(Printed)

TITLE: VP - GENERATION OPERATIONS

THUS DONE AND SIGNED in duplicate original before me this 16<sup>th</sup> day of January, 20 20, at Pinerville, LA.

*Anne M. Mizell*  
NOTARY PUBLIC (ID # 18526)



(stamped or printed)

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
Chuck Carr Brown, Ph.D., Secretary

BY: *Lourdes Iturralde*  
Lourdes Iturralde, Assistant Secretary  
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 8<sup>th</sup> day of April, 20 20, at Baton Rouge, Louisiana.

*On H*  
NOTARY PUBLIC (ID # 19181)

*Perry Theriot*  
(stamped or printed)

Approved: *Lourdes Iturralde*  
Lourdes Iturralde, Assistant Secretary



Jeff Landry  
Attorney General

## State of Louisiana

DEPARTMENT OF JUSTICE  
CIVIL DIVISION  
P.O. BOX 94005  
BATON ROUGE  
70804-9005

RECEIVED

MAR 24 2020

LA DEPT OF ENV QUALITY  
LEGAL DIVISION

March 13, 2020

Herman Robinson, General Counsel  
La. Department of Environmental Quality  
Legal Division  
P.O. Box 4302  
Baton Rouge, LA 70821-4302

Cleco Power LLC  
c/o Mark D. Pearce  
Agent for Service of Process  
2030 Donahue Ferry Road  
Baton Rouge, LA 71360

Re: AG Review of DEQ Settlement;  
Cleco Power LLC  
Settlement No.: SA-AE-19-0096

Dear Mr. Robinson and Cleco Power LLC:

Louisiana Revised Statute 30:2050.7 authorizes the Louisiana Department of Environmental Quality, with the concurrence of the Attorney General, to settle claims for penalties under the Louisiana Environmental Quality Act or the regulations or permit terms and conditions applicable thereto. Specifically, La. R.S. 30:2050.7(E)(2)(a) provides, “[s]ettlements provided for under this Section shall be submitted to the attorney general for his approval or rejection...[a]pproval or rejection by the attorney general shall be in writing with a detailed written reason for rejection.”

Settlement No. SA-AE-19-0096, and the underlying enforcement action, has been submitted to me for approval or rejection as required by law. Pursuant to the authority granted to me by Art. IV, Sec. 8 of the state constitution and R.S. 30:2050.7, I approve the above referenced settlement.

Sincerely,

**JEFF LANDRY**  
**ATTORNEY GENERAL**

By: \_\_\_\_\_

  
Ryan M. Seidemann  
Assistant Attorney General

# SETTLEMENT PAYMENT FORM

Please attach this form to your settlement payment  
and submit to:

Department of Environmental Quality  
Financial Services Division  
P. O. Box 4303  
Baton Rouge, Louisiana 70821-4303  
**Attn:** Accountant Administrator

Payment # \_\_\_\_\_

**Respondent: Cleco Power LLC**

**Settlement No: SA-AE-19-0096**

**Enforcement Tracking No(s): AE-CN-15-00204**

**Payment Amount: \$4,000.00**

**AI Number: 83623**

**Alternate ID No(s):**

**TEMPO Activity Number: ENF20170001**

<b>For Official Use Only. Do Not write in this Section.</b>	
<b>Check Number:</b>	<b>Check Date:</b>
<b>Check Amount:</b>	<b>Received Date:</b>
<b>PIV Number:</b>	<b>PIV Date:</b>
<b>Stamp "Paid" in the box to the right and initial.</b>	
<b>Route Completed form to: Celena Cage, Administrator Enforcement Division</b>	
<b>And copy Perry Theriot Legal Division</b>	



JOHN BEL EDWARDS  
GOVERNOR

CHUCK CARR BROWN, PH.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

September 20, 2017

CERTIFIED MAIL (7004 2510 0006 3853 3889)  
RETURN RECEIPT REQUESTED

**CLECO POWER LLC**  
c/o Mark D. Pearce  
Agent for Service of Process  
2030 Donahue Ferry Road  
Pineville, LA 71360

**RE: CONSOLIDATED COMPLIANCE ORDER  
& NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-15-00204  
AGENCY INTEREST NO. 83623**

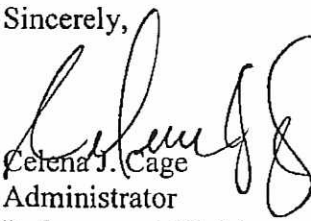
Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **CLECO POWER LLC (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Pascal Ojong at (225) 219-4468.

Sincerely,

  
Cerena J. Cage  
Administrator  
Enforcement Division

CJC/PON/pon  
Alt ID No. 0040-00105  
Attachment





c: Cleco Power LLC  
30385 Crowley-Eunice Highway  
Eunice, LA 70535

**STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE**

**IN THE MATTER OF**

**CLECO POWER LLC  
ACADIA PARISH  
ALT ID NO. 0040-00105**

**PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.**

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**ENFORCEMENT TRACKING NO.**

**AE-CN-15-00204**

**AGENCY INTEREST NO.**

**83623**

**CONSOLIDATED  
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **CLECO POWER LLC (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

I.

The Respondent owns and/or operates the Acadia Power Station (the Facility), a fossil-fueled steam electric generator facility, located at 30385 Crowley-Eunice Highway in Eunice, Acadia Parish, Louisiana. The Facility operates or has operated under the authority of Title V Air Permit No. 0040-00105-V3 issued on or about July 17, 2015.

II.

On or about November 5, through November 6, 2014, a Chemical Accident Prevention Plan (CAPP) inspection of the Respondent's facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations.

While the Department's investigation is not yet complete, the following violations were noted during the course of the inspection:

- A. The Respondent had one management of change (MOC) since the last CAPP inspection. The change occurred during an outage in October 2012. The MOC procedure did not have the required regional approval signature. The MOC procedure was incomplete and the form did not identify a workflow for approval and did not require approval of the change before work begins on the project. There was no identifiable part of the MOC process that requires consideration of safety and health impacts. Each failure to develop and implement written procedures to manage changes is a violation of 40 CFR 68.75(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- B. The Respondent reported that the facility had recommendations from the internal compliance audit but there was no documented response to each of the recommendations that were made or a documented response that the deficiencies had been corrected. Each failure to promptly determine and document an appropriate response to each of the findings or recommendations of the compliance audit and to document that deficiencies had been corrected is a violation of 40 CFR 68.79(d) which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). The Respondent stated that the facility has been working on having a formalized system of documenting recommendations or action items. This will ensure the facility promptly addresses the recommendations from the compliance audit.
- C. The Respondent reported that it complied with 40 CFR 68.87(b)(2) by training contractors on the hazards of the process through the site orientation video. The Respondent was unable to verify if five (5) contractors present during an outage in October 2012, had viewed the orientation video. Each failure to maintain documentation or evidence that contractors were trained on the known hazards related to the contractor's work and the process is a

violation of 40 CFR 68.200 which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).

D. The Respondent reported that it complied with 40 CFR 68.87(b)(2) by training contractors on the applicable emergency response program through the site orientation video. The Respondent was unable to verify if five (5) contractors present during an outage in October 2012, had viewed the orientation video. The failure to document that contract operators were trained on the applicable provisions of the emergency response program is a violation of 40 CFR 68.200, which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2)

### **COMPLIANCE ORDER**

Based on the foregoing, the Respondent is **hereby ordered:**

#### **I.**

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Act, the Air Quality Regulations, and all applicable permits.

#### **II.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation demonstrating that the MOC procedure has been updated as referenced in Paragraph II. A of the Findings of Fact.

#### **III.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation demonstrating that the audit action items were addressed as referenced in Paragraph II. B of the Findings of Fact.

#### **IV.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation demonstrating that the contractors are trained on the

applicable emergency response program and that they are informed of the hazards of the process as referenced in Paragraph II. C and II. D of the Findings of Fact.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
**Attn: Pascal Ojong**  
**Re: Enforcement Tracking No. AE-CN-15-00204**  
**Agency Interest No. 83623**

**THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:**

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
**Attn: Hearings Clerk, Legal Division**  
**Re: Enforcement Tracking No. AE-CN-15-00204**  
**Agency Interest No. 83623**

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

## NOTICE OF POTENTIAL PENALTY

### I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

### II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Pascal Ojong at (225) 219-4468 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

### III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

### IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached **"CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL**

**PENALTY REQUEST TO CLOSE**” form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

The **NOTICE OF POTENTIAL PENALTY** will not be closed if the Respondent owes outstanding fees to the Department. Please contact the Financial Services Division at 225-219-3865 or via email at [\\_DEQ-WWWFinancialServices@la.gov](mailto:_DEQ-WWWFinancialServices@la.gov) to determine if you owe outstanding fees.

VI.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 20<sup>th</sup> day of September, 2017.



\_\_\_\_\_  
Lourdes Iturralde  
Assistant Secretary  
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
P.O. Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Pascal Ojong



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
 OFFICE OF ENVIRONMENTAL COMPLIANCE  
 ENFORCEMENT DIVISION                      CONSOLIDATED COMPLIANCE ORDER &  
 POST OFFICE BOX 4312                      NOTICE OF POTENTIAL PENALTY  
 BATON ROUGE, LOUISIANA 70821-4312                      REQUEST TO CLOSE



Enforcement Tracking No.	AE-CN-15-00204	Contact Name	Pascal Ojong
Agency Interest (AI) No.	83623	Contact Phone No.	(225) 219-4468
Alternate ID No.	0040-00105		
Respondent:	Cleco Power LLC	Facility Name:	Acadia Power Station
	c/o Mark D. Pearce	Physical Location:	30385 Crowley-Eunice Highway, ,
	Agent for Service of Process		
	2030 Donahue Ferry Road	City, State, Zip:	Eunice, Louisiana 70535
Pineville, LA 71360	Parish:	Acadia Parish	

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph V of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraphs II-IV Of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.

In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00204), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.

In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00204), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$\_\_\_\_\_ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance.

- Monetary component = \$ \_\_\_\_\_
- Beneficial Environmental Project (BEP) component (optional)= \$ \_\_\_\_\_
- DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00204) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT		
<p><i>I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.</i></p>		
Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date
MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:		
<p>Louisiana Department of Environmental Quality                      Office of Environmental Compliance                      Enforcement Division                      P.O. Box 4312                      Baton Rouge, LA 70821                      Attn: Pascal Ojong</p>		