

US EPA ARCHIVE DOCUMENT

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March 26, 2009

Mr. Richard Kinch
US Environmental Protection Agency (53306P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460



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

Dear Mr. Kinch:

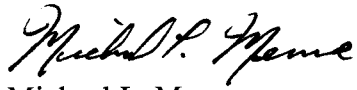
This letter and attachments are AmerenEnergy Generating and AmerenEnergy Resources Companies' response to the United States Environmental Protection Agency's request for information relating to the surface impoundments or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

AmerenEnergy Generating and AmerenEnergy Resources Companies have received requests for information about their five coal-fired power stations in Illinois. Although most of our surface impoundments are not considered to be dams by State or Federal regulations, we are subject to State and Federal NPDES regulations and have had Agency personnel inspect these units. We are providing a full and complete response to each separate request for information set forth in your Enclosure A (attached) with responses corresponding to numbering in your questions. If you have any further questions please feel free to contact Paul Pike at (314) 554-2388.

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 of 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,

A handwritten signature in black ink that reads "Michael L. Menne". The signature is written in a cursive style with a large initial "M".

Michael L. Menne
Vice President – Environmental Services

Enclosure A

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids. .

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.
2. What year was each management unit commissioned and expanded? ;
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).
4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste-management unit(s) under the supervision of a Professional Engineer?
5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?
6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.
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.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

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 releases to groundwater).

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

AmerenEnergy Generating Company Response

Meredosia Power Station
 800 W. Washington
 Meredosia, Illinois 62665

- Coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.

- See table below.

Management Unit	Year Commissioned or Expanded
Fly Ash Pond	1968
Bottom Ash Pond	1972

- See table below.

Management Unit	Materials Contained in Unit*
Fly Ash Pond	1
Bottom Ash Pond	2

*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.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

- The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the waste management units is under the supervision of a Professional Engineer.
- The most recent annual internal professional engineering inspection of the management units occurred in 2009. Since these management units are not classified by regulation as dams the evaluation only included a visual inspection of the units. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the

implementation of the company Dam Safety Program and this Group is supervised by a licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Fly Ash Pond	186	700	650	24
Bottom Ash Pond	34	186	139	24

The volume measurement includes area excavated below natural surface level and was determined in 2007.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are only aware of one instance when there was a release from our surface impoundments to the land. The incident occurred in late December, 2006, when we released a small amount of water (less than 500 gallons) from the fly ash pond to the land. In response, we modified the pond and developed internal procedures to prevent a recurrence of the situation. We are not aware of any other spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
10. The current legal owner and operator at the facility is AmerenEnergy Generating Company.

AmerenEnergy Generating Company Response

Hutsonville Power Station
15142 East 1900 Avenue
Hutsonville, Illinois 62433

1. One of the coal-combustion by-product surface impoundments at this Station is classified as a dam by State or Federal regulatory agencies. The unit that we refer to as Ash Pond A is classified under Illinois regulations as a Class III dam which is considered to be a low risk unit. The potential hazard rating was established by company employees, and the basis of the rating was the size of the pond and that in case of a failure, it has a low probability for causing loss of life, where there are no permanent structures for human habitation, or minimal economic loss in excess of that which would naturally occur downstream of the dam if the dam had not failed.. The Illinois Department of Natural Resources is the agency that regulates the unit. All the remaining coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.
2. See table below.

Management Unit	Year Commissioned or Expanded
Ash Pond A	1986
Ash Pond B	2000
Ash Pond C	2000
Bottom Ash Pond	1940

3. See table below.

Management Unit	Materials Contained in Unit*
Ash Pond A	1
Ash Pond B	1, 2
Ash Pond C	1, 2, 5
Bottom Ash Pond	2

*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.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; sanitary wastewater treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the management units is under the supervision of a Professional Engineer.
5. The most recent annual internal professional engineering inspection of the management units occurred in 2009. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the implementation of the company Dam Safety Program and this Group are supervised by a licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

Ash Pond A was evaluated for its structural integrity during its design in March, 1984. The individual who conducted the structural integrity assessments/evaluations was a geotechnical engineer who is licensed by the State of Illinois as a professional engineer. The evaluation was used to guide construction of the facility and no corrective actions other than possible design changes of the proposed unit were required based on the evaluation.

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Ash Pond A	14	250	50	22
Ash Pond B	4.4	70	10	17
Ash Pond C	2	20	5	12

Bottom Ash Pond	1.2	6	3	15
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The volume measurement includes area excavated below natural surface level and was determined in 2007.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
10. The current legal owner and operator at the facility is AmerenEnergy Generating Company.

AmerenEnergy Generating Company Response

Newton Power Station
 6725 North 500th Street
 Newton, Illinois 62448

1. Coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.
2. See table below.

Management Unit	Year Commissioned or Expanded
Primary Ash Pond	1977
Secondary Ash Pond	1977

3. See table below.

Management Unit	Materials Contained in Unit*
Primary Ash Pond	1, 2, 5
Secondary Ash Pond	1, 2, 5

*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.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems; primary water treatment; boiler water make-up treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the waste management units is under the supervision of a Professional Engineer.
5. The most recent annual internal professional engineering inspection of the management units occurred in 2009. Since these management units are not classified by regulation as dams the evaluation only included a visual inspection of the units. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the implementation of the company Dam Safety Program and this Group is supervised by a

licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Primary Ash Pond	400	9250	2000	47
Bottom Ash Pond	9.3	83	minimal	29

The volume measurement includes area excavated below natural surface level and was determined in 2007.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
10. The current legal owner and operator at the facility is AmerenEnergy Generating Company.

AmerenEnergy Resources Generating Company Response

Duck Creek Power Station
17751 N. Cilco Road
Canton, Illinois 61520

1. Coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.
2. See table below.

Management Unit	Year Commissioned or Expanded
Ash Pond 1	1976
Ash Pond 2	1986

3. See table below.

Management Unit	Materials Contained in Unit*
Ash Pond 1	1, 2, 4
Ash Pond 2	1, 2, 4

*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.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; sanitary wastewater treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the waste management units is under the supervision of a Professional Engineer.
5. The most recent annual internal professional engineering inspection of the management units occurred in 2009. Since these management units are not classified by regulation as dams the evaluation only included a visual inspection of the units. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the implementation of the company Dam Safety Program and this Group is supervised by a

licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

- 6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
- 7. Not applicable, see response to Question 6.
- 8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Ash Pond 1	58	1300	1900	50
Ash Pond 2	85	1000	800	45

The volume measurement includes area excavated below natural surface level and was determined in 2007.

- 9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
- 10. The current legal owner and operator at the facility is AmerenEnergy Resources Generating Company.

AmerenEnergy Resources Generating Company Response

E. D. Edwards Power Station
7800 South Cilco Lane
Bartonville, Illinois 61607

1. Coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.

2. See table below.

Management Unit	Year Commissioned or Expanded
Ash Pond	1960

3. See table below.

Management Unit	Materials Contained in Unit*
Fly Ash Pond	1, 2, 5

*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.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the waste management units is under the supervision of a Professional Engineer.

5. The most recent annual internal professional engineering inspection of the management units occurred in 2009. Since these management units are not classified by regulation as dams the evaluation only included a visual inspection of the units. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the implementation of the company Dam Safety Program and this Group is supervised by a licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then

corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Fly Ash Pond	89	1,800	1,000	32

The volume measurement includes area excavated below natural surface level and was determined in 2007.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
10. The current legal owner and operator at the facility is AmerenEnergy Resources Generating Company.