

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 27, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Michael Menne, Vice President Environmental Services
Ameren Energy
One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149
St Louis, Mo. 63166-6149

Dear Mr. Menne,

On August 12, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the ED Edwards facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the ED Edwards facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the ED Edwards facility is enclosed. This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the ED Edwards facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by July 27, 2011. Please send your response to:

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

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

Recommendations

Recommendations shall be written concisely and identify the specific actions to be taken. The first word in the recommendation should be an action word (i.e. "Prepare," "Perform," or "Submit"). The recommendations shall be prioritized and numbered to provide easy reference. Impoundment safety recommendations shall be grouped, listed, or categorized similar to the U.S. Department of Interior, "Reclamation Manual, Directives and Standards, Review/Examination Program for High- and Significant-Hazard Impoundments," FAC 01-07 dated July 1998 as follows:

Priority 1 Recommendations: Priority 1 Recommendations involve the correction of severe deficiencies where action is required to ensure the structural safety, operational integrity of a facility, and the safety of the impoundment.

Priority 2 Recommendations: Priority 2 Recommendations are where action is needed or required to prevent or reduce further damage, impair operation, and/or improve or enhance the O&M of the facility. These items do not appear to threaten the safety of the impoundment.

Priority 1 Recommendations

1. Prepare an EAP for the facility.
2. Perform a hydrologic and hydraulic study.
3. Review stability and seismic analyses that are being prepared by Ameren Energy.
4. Evaluate the depth and rate of movements of the west slope.
5. Monitor potential erosion in creek.
6. Perform video assessments of culvert piping.
7. Control vegetation on the upstream and downstream slopes.

Priority 2 Recommendations

1. Repair erosion of embankments.
2. Maintain a log of maintenance and other activities at the fly ash impoundments and supporting facilities.
3. Monitor groundwater levels.