

US EPA ARCHIVE DOCUMENT



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

March 13, 2013

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

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

Re: Request for Action Plan regarding Ameren Energy Generating Co's – Hutsonville Power Station

Dear Mr. Menne,

On June 2, 2011 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Ameren Energy Generating Co's – Hutsonville Power Station 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 Ameren Energy Generating Co's – Hutsonville Power Station 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 Ameren Energy Generating Co's – Hutsonville Power Station facility can be accessed at the secured link below. The secured link will expire in 60 days.

Here is the link: <http://www.yousendit.com/download/UVJqV293Mm1UME0xZXNUQw>

Here is the Password: Ame42690G

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 Ameren Energy Generating Co's – Hutsonville Power Station facility. These recommendations are listed in Enclosure 1.

Since these recommendations relate to actions which could affect the structural stability of the CCR management unit(s) 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 provide a rationale. Please provide a response to this request by **April 15, 2013**. 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  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov), [dufficy.craig@epa.gov](mailto:dufficy.craig@epa.gov), [kelly.patrickm@epa.gov](mailto:kelly.patrickm@epa.gov) and [englander.jana@epa.gov](mailto:englander.jana@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

Enclosure

Enclosure 1  
**Ameren Energy Generating Co's – Hutsonville Power Station Recommendations  
(from the final assessment report)**

## **CONCLUSIONS**

**In general, the Pond A was found to have the following deficiencies:**

1. Animal burrows along the crest;
2. Minor sloughing on the downstream slope;
3. No documented hydrologic/hydraulic analysis; and,
4. Conditions leading to inadequate freeboard.

**In general, the Pond B was found to have the following deficiencies:**

1. No documented stability analysis.

**In general, the Pond D was found to have the following deficiencies:**

1. The calculated factor of safety under seismic loading was less than the generally accepted value 1.0.

## **RECOMMENDATIONS**

Please note that access to the downstream slope of Pond D along the Wabash River was limited and additional deficiencies may or may not be present along the slope. The following sections describe the recommended approach to address current deficiencies. Prior to undertaking recommended maintenance, repairs, or remedial measures, the applicability of permits needs to be determined for activities that may occur within the jurisdiction of the appropriate regulatory agencies.

### **Studies and Analyses**

**GZA recommends the following studies and analyses:**

1. Perform a stability analysis of the slopes of Pond B;
2. Perform a hydrologic/hydraulic analysis on Pond A to establish the maximum allowable water elevation; and,
3. Perform seismic stability analysis of the Pond D embankment.

### **Recurrent Operation & Maintenance Recommendations**

**GZA recommends the following operation and maintenance level activities:**

1. Repair sloughing on the downstream slope of Pond A;
2. Fill currently observed animal burrows by injecting grout under low to moderate pressures to ensure the entire limits of the respective burrow is adequately filled;
3. Exercise stoplogs and slide gates;
4. Increase frequency of maintenance mowing such that overgrowth of vegetation is minimized; and,
5. Develop an Emergency Action Plan for the impoundments.

### **Remedial Measures Recommendations**

1. In conjunction with the results of the hydrologic and hydraulic analyses, make provisions for an emergency overflow spillway(s) if appropriate;
2. In conjunction with the results of the stability analyses, make provisions to address deficiencies if/as necessary; and
3. In conjunction with the results of the seismic stability analysis, take measures to increase the factor of safety of the embankment for Pond D under seismic loading to at least 1.0 as appropriate.