

US EPA ARCHIVE DOCUMENT



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

July 28, 2011

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

Dear Mr. Menne,

On November 17, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Labadie 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 Labadie 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 Labadie Power Station 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 Labadie Power Station 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 provide a rationale. Please provide a response to this request by August 29, 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  
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)

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

**Labadie Power Station Recommendations (from the final assessment report)**

Based on the findings of our visual inspection and *review* of the available records for the Bottom Ash Pond and the Fly Ash Pond, O'Brien & Gere recommends that additional maintenance of the embankments be completed to correct the miscellaneous deficiencies in the final report. The seepage along the toe of the western embankment should continue to be monitored and any changes in the color, rate or location of seepage brought immediately to the attention of the Ameren Dam Safety & Engineering group. Additional measures may be required if changes in the color, rate or location of seepage are observed.

**6.1. URGENT ACTION ITEMS**

None of the recommendations are considered to be urgent, since the issues noted in the final report do not appear to threaten the structural integrity of the impoundments in the near term.

**6.2. LONG TERM IMPROVEMENTS**

The deficient conditions observed during the inspection do not require immediate attention, but additional actions should be implemented in the near future as part of a regular maintenance plan. The recommended maintenance/improvement actions are described below:

**Bottom Ash Pond**

- Outboard slopes - remove deleterious vegetation and continue regular maintenance of the slopes.
- Additional studies - no additional studies may be needed. The input for cross section 5 should be provided.
- If the Bottom Ash Pond is not taken out of service and replaced with the dry landfill, a seepage collection and monitoring system installed along the outboard slope of the western embankment if changes in the color, rate or location of seepage are *observed*.

**Fly Ash Pond**

- Outboard slopes - repair animal burrows.
- Inboard slopes - remove the small tree growing along the northern portion of the embankment.
- Interior crest - repair erosion near discharge end of six-inch diameter PVC pipes .
- Additional studies - no additional studies may be needed. However, an explanation as to why the water level readings in Soundings P-3 and P-4 were not used in the analyses should be provided, and/or the slope stability analyses should be re-run using the data from Sounding P-4 (apparent worst-case scenario).

**6.3. MONITORING AND FUTURE INSPECTIONS**

Continue weekly inspections by Labadie Power Station personnel and annual inspections by the Ameren Dam Safety & Hydro Engineering group.

**6.4. TIME FRAME FOR COMPLETION OF REPAIRS/IMPROVEMENTS**

It is recommended that the minor repairs recommended above be completed within *twelve* (12) months.