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

July 26, 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 September 29, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Meramec 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 Meramec 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 Meramec 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 Meramec 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 23, 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 of 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

Enclosure 2

Meramec Power Station Recommendations (from the final assessment report)

1.2.1 Recommendations Regarding the Structural Stability

The minimum factor of safety for steady seepage required by MDNR and USEPA is not met. Ameren Missouri has initiated a project to be implemented in 2011 to flatten the existing slopes on the downstream side of Pond 1, 2, and 4 to improve the factor of safety to meet and exceed minimum Factors of Safety (see Appendix A, Docs 1.11 and 1.12 of the final report). According to Ameren Missouri the project cannot begin until river levels recede to normal levels (i.e., Summer 2011). We strongly recommend the dikes be re-configured as quickly as possible.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

The data provided indicates the 100-year, 24-hour storm event will overtop embankment levees of Pond 1 and Pond 2, and the 100-year Mississippi River flood will inundate Meramec Power Station. However, based on the history (including the 2011 flooding) and future downstream slope improvement project, failures of the embankment levees are not anticipated. It is recommended to monitor 100-year, 24-hour storm events for overtopping of the embankment levees and make repairs from potential erosion caused by overtopping.

1.2.3 Recommendations Regarding the Description of the Management Unit(s)

Documented descriptions of the CCW ponds and operational procedures were not provided. An Operation & Maintenance manual for the Meramec PS to provide a summary of the purpose and processes within the CCW ponds is planned by Ameren Missouri in 2011.

1.2.4 Recommendations Regarding the Maintenance and Methods of Operation

It is recommended to continue to monitor the seepage area observed at the outside toe of Pond 4 for changed conditions.

It is recommended to continue to monitor the inside slope and retaining wall of Pond 1.

As recommended in the engineer's report of November 2010, Ameren Missouri must continue to ensure positive drainage is maintained from the inactive ponds.

1.2.5 Recommendations Regarding the Surveillance and Monitoring Program

Internal inspections of the outlet structures with a remote camera or by personnel using confined-space procedures should be conducted on a frequency of at least once every 5 years.

1.2.6 Recommendations Regarding Continued Safe and Reliable Operation

Continued safe and reliable ash management is dependent upon completing the proposed modifications to the downstream side of the dikes for Ponds 1, 2 and 4 as soon as possible. Ameren Missouri should notify USEPA upon completion of the re-configuration project.