

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Ameren UE, Rush Island Power Station, Festus, MO
Round 7 Draft Assessment Report

To: File

From: Jana Englander, OSWER, US EPA

Date: January 10, 2011

No Comments



February 11, 2011

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

**Re: Ameren Missouri
Rush Island Power Station
Response to Dewberry & Davis Draft CCW Impoundment
Round 7 - Dam Safety Assessment Report**

Dear Mr. Hoffman:

The draft Coal Combustion Waste Impoundment, Round 7 – Dam Assessment Report for the Rush Island Power Station was received by Ameren Missouri from the U.S. EPA on February 4, 2011. The dam inspection and assessment report were performed for the EPA by Dewberry & Davis. Please note that we have recently revised the designation for our Company from AmerenUE to Ameren Missouri.

The report found the Rush Island Ash Pond to be “Satisfactory” for continued safe and reliable operation. We agree with this finding.

It should be noted that since the field inspection was completed, the Missouri Department of Natural Resources (MDNR) has accepted our dam safety permit application and issued a Registration Permit R-494 for the dam.

Some comments on the draft report are provided below. Excerpts of the Dewberry & Davis report are presented in bold face type and our responses are provided in regular type.

1.3.1 List of Participants:

“Andy William” with AmerenUE should be “Andy Williamson”

2.4.2 Outlet Structure: The outlet pipe has two CO₂ control valves and a sampling pump that regulate discharge. Site plans indicate a design inlet invert of 382.54 feet and a design outlet invert of 372.49 feet.

One of the valves is driven off of the pH level of the discharge and is either 100% or 0% open depending on the pH. The other valve is not tied to any parameter and is a manually controlled throttle valve.

3.0 SUMMARY OF RELEVANT REPORTS, PERMITS, AND INCIDENTS: Quarterly mowing of bottom ash pond slopes to extend at least 15 feet beyond the downstream toe.

The word “bottom” should be removed.

5.3.2 Outlet Conduit: The outlet pipe has two CO2 control valves and a sampling pump that regulate discharge water.

One of the valves is driven off of the pH level of the discharge and is either 100% or 0% open depending on the pH. The other valve is not tied to any parameter and is a manually controlled throttle valve.

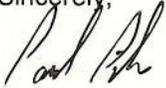
Business Confidentiality Claim

We request the Draft Dam Safety Assessment Report for the Rush Island Power Station prepared by Dewberry & Davis, as well as our response to the report remain confidential. This request is made in accordance with the procedures described in 40 CFR, Part 2, Subpart B.

When initially submitting documents to Dewberry & Davis for preparation of their report we also designated the support materials as confidential.

If you need further information, please feel free to contact me at 314-554-2388.

Sincerely,



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