

Ameren Services

Environmental Services  
314.554.2388 (Phone)  
314.554.4182 (Facsimile)  
ppike@ameren.com

One Ameren Plaza  
1901 Chouteau Avenue  
PO Box 66149  
St. Louis, MO 63166-6149  
314.621.3222

Filed  
April 8, 2014  
Data Center  
Missouri Public  
Service Commission

January 26, 2010

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: Request for Information under Section 104 (e) of the Comprehensive  
Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

Dear Mr. Kinch:



This letter and attachments are AmerenEnergy Resources Company and Electric Energy Inc. response to the United States Environmental Protection Agency's request for information relating to the surface impoundments or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

AmerenEnergy Resources Company and Electric Energy Inc. have received requests for information about their two coal-fired power stations in Illinois. Although most of our surface impoundments are not regulated as dams by State or Federal Agencies, they are subject to State and Federal NPDES regulations and have had Agency personnel inspect these units. We are providing a full and complete response to each separate request for information set forth in your Enclosure A (attached) with responses corresponding to numbering in your questions. If you have any further questions please feel free to contact Paul Pike at (314) 554-2388.

*I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.*

Sincerely,

A handwritten signature in cursive script that reads "Michael L. Menne".

Michael L. Menne  
Vice President – Environmental Services  
Ameren Services

Exhibit No. 346  
Date 3-3-2014 Reporter Stewart  
File No. EA-2012-0281

## Enclosure A

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids. .

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.
2. What year was each management unit commissioned and expanded? ;
3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).
4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste-management unit(s) under the supervision of a Professional Engineer?
5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?
6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.  
Please provide a copy of the most recent official inspection report or evaluation.
7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to

deal with the issue or issues. Please provide any documentation that you have for these actions.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

10. Please identify all current legal owner(s) and operator(s) at the facility.

**AmerenEnergy Resources Company Response**

Coffeen Power Station  
134 CIPS Lane  
Coffeen, Illinois 62433

1. Coal-combustion by-product surface impoundments at this Station are not classified as dams by State or Federal regulatory agencies so they have not been rated.
2. See table below.

<b>Management Unit</b>	<b>Year Commissioned or Expanded</b>
Recycle Pond	1979
Gypsum Management Facility Recycle Pond	2009

3. See table below.

<b>Management Unit</b>	<b>Materials Contained in Unit*</b>
Recycle Pond	3, 5
Gypsum Management Facility Recycle Pond	4

\*Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other.

Other types of materials that are temporarily or permanently contained in the unit(s) include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; sanitary wastewater treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management units at this facility were designed by a Professional Engineer. The construction of the management units were done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the management units is under the supervision of a Professional Engineer.
5. The most recent annual internal professional engineering inspection of the management units occurred in 2009. AmerenEnergy Resources Company has formed a Dam Safety Group consisting of civil engineers who oversee the implementation of the company Dam Safety Program and this Group is supervised by a licensed Professional Engineer. The Dam Safety Program requires routine, annual and special inspection of the ash ponds and employees performing these inspections receive dam safety training. If maintenance issues are identified in these

visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is reviewed and evaluated by Dam Safety Group personnel.

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit(s), and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Material (Acre-ft)	Maximum Height of Unit (ft.)
Recycle Pond*	23	500	250	41.5
Gypsum Management Facility Recycle Pond	17	243	<1	16

\* The volume measurement includes area excavated below natural surface level and was determined in 2007.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundments to surface water or to the land.
10. The current legal owner and operator at the facility is AmerenEnergy Resources Company.

**Electric Energy Inc. Company Response**

Joppa Plant  
2100 Portland Road  
Joppa, Illinois 62953

1. Coal-combustion by-product surface impoundment at this Station is not classified as a dam by State or Federal regulatory agencies so they have not been rated.
2. See table below.

<b>Management Unit</b>	<b>Year Commissioned or Expanded</b>
Ash Pond	1973

3. See table below.

<b>Management Unit</b>	<b>Materials Contained in Unit*</b>
Ash Pond	1, 2, 3, 5

\*Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other.

Other types of materials that are temporarily or permanently contained in the unit include, but are not limited to residual wastes remaining following treatment of wastewater from these systems: primary water treatment; boiler water make-up treatment; laboratory and sampling streams; boiler blowdown; floor drains; coal pile run off; house service water systems; and pyrites.

4. The management unit at this facility was designed by a Professional Engineer. The construction of the management unit was done under the supervision of a Professional Engineer. And, inspection and monitoring of the safety of the waste management unit is under the supervision of plant personnel.
5. The most recent annual engineering inspection of the management units occurred in 2009. The inspection was performed by a licensed professional engineer. Since the management unit is not classified by regulation as a dam the evaluation only included a visual inspection of the units. Electric Energy Inc. has an in-house program for dam safety consisting of procedures to implement the company Dam Safety Program and this is overseen by plant personnel. The Dam Safety Program requires routine, annual and special inspection of the ash pond and employees performing these inspections receive dam safety training. If maintenance issues are identified in these visual inspections, then corrective actions are taken by either plant employees or contractors to remedy the issue and final acceptance of the work is

reviewed and evaluated by plant personnel and as needed by a licensed professional engineer..

6. No State, or Federal regulatory official has inspected or evaluated the safety (structural integrity) of the management unit, and we are not aware of a planned state or federal inspection or evaluation in the future.
7. Not applicable, see response to Question 6.
8. See table below.

Management Unit	Surface Area (Acres)	Total Storage Capacity (Acre-ft)	Volume of Stored Ash (Acre-ft)	Maximum Height of Unit (ft.)
Ash Pond	103	3833	2957	55

The volume measurement includes area excavated below natural surface level and was determined in 2009.

9. Assuming that brief history means incident(s) which could have occurred in the last ten (10) years, we are not aware of any spills or unpermitted releases of coal-combustion by-products from our surface impoundment to surface water or to the land.
10. The current legal owner and operator at the facility is Electric Energy Inc.

Bcc: C. D. Naslund  
C. Iselin  
J. Coyle  
J. R. Romang  
W. Shepperd  
M. Pullen  
T. Larbes  
B. Parker  
S. D. Bluemner  
M. J. Wagstaff  
S. J. Harvey  
S. B. Knowles  
D. J. Lidisky  
M. M. Bryant  
C. R. Henderson  
J. C. Pozzo  
M. F. Bollinger  
M. J. Smallwood  
P. R. Pike  
File: WM 3.16  
WM 3.29