



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

Filed
April 8, 2014
Data Center
Missouri Public
Service Commission

(217) 782-5544

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

7010 2780 0002 1167 6079

February 13, 2013

Mr. John C. Pozzo
1 Ameren Plaza
1901 Chouteau Ave.
St. Louis, MO 63103

Re: Notice of Intent to Pursue Legal Action
Ameren Grand Tower Generating Station
Identification No.: 6285
Violation Notice: W-2012-00062

RECEIVED

FEB 15 2013

Dear Mr. Pozzo:

IEPA/CAS

This Notice of Intent to Pursue Legal Action is provided pursuant to Section 31(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(b)(2012). The Illinois Environmental Protection Agency ("Illinois EPA") is providing this notice because you have failed to respond adequately to the Violation Notice dated June 27, 2012, and issued by the Illinois EPA within the time frame required by Section 31 of the Act.

The Illinois EPA is providing this notice because it may pursue legal action for the violations of environmental statutes, regulations and permits specified in Attachment A. The Notice of Intent to Pursue Legal Action provides the opportunity to schedule a meeting with representatives of the Illinois EPA to attempt to resolve the violations of the Act, regulations and permits specified in Attachment A. If a meeting is requested, it must be held within thirty (30) days of receipt of this notice unless an extension of time is agreed to by the Illinois EPA.

If you wish to schedule a meeting with representatives of the Illinois EPA or have any questions, please contact Joey Logan-Wilkey at (217) 782-5544 within twenty (20) days of your receipt of this notice.

Sincerely,

Connie L. Tonsor
Deputy Counsel
Division of Legal Counsel

Attachment

JLW:jlw:p:Ameren

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

MAR 28 2013

REVIEWER EAV

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120

9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312)814-6026

PLEASE PRINT ON RECYCLED PAPER

ATTACHMENT A

AMEREN, GRAND TOWER GENERATING STATION, ID:6285
 VIOLATION NOTICE NO. W-2012-00062:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Ameren must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation**Description**

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well APW-1 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.25 su	6.5-9.0 su	03/23/2011
pH	5.76 su	6.5-9.0 su	11/29/2010
TDS	1,310 mg/l	1,200 mg/l	11/29/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation**Description**

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well APW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	5.93 su	6.5-9.0 su	11/29/2010
Boron	6.97 mg/l	2.0 mg/l	02/15/2012
Boron	5.84 mg/l	2.0 mg/l	11/28/2011
Boron	7.06 mg/l	2.0 mg/l	09/12/2011
Boron	8.61 mg/l	2.0 mg/l	06/22/2011
Boron	7.93 mg/l	2.0 mg/l	03/24/2011
Boron	6.16 mg/l	2.0 mg/l	11/29/2010

ATTACHMENT A

AMEREN, GRAND TOWER GENERATING STATION, ID:6285

VIOLATION NOTICE NO. W-2012-00062:

ViolationDescription

APW-2 continued

Parameter	Sample Value	GW Standard	Collection Date
Iron	8.53 mg/l	5.0 mg/l	02/15/2012
Iron	10.1 mg/l	5.0 mg/l	03/24/2011
Iron	7.44 mg/l	5.0 mg/l	11/29/2010
Manganese	0.636 mg/l	0.15 mg/l	02/15/2012
Manganese	0.660 mg/l	0.15 mg/l	11/28/2011
Manganese	0.691 mg/l	0.15 mg/l	09/12/2011
Manganese	0.654 mg/l	0.15 mg/l	06/22/2011
Manganese	0.678 mg/l	0.15 mg/l	03/24/2011
Manganese	0.774 mg/l	0.15 mg/l	11/29/2010
Sulfate	410 mg/l	400 mg/l	02/15/2012
Sulfate	428 mg/l	400 mg/l	06/22/2011
Sulfate	425 mg/l	400 mg/l	03/24/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ViolationDescription

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well APW-3 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.43 su	6.5-9.0 su	11/29/2010
Boron	4.90 mg/l	2.0 mg/l	02/15/2012
Boron	4.68 mg/l	2.0 mg/l	11/28/2011
Boron	4.65 mg/l	2.0 mg/l	09/12/2011
Boron	4.79 mg/l	2.0 mg/l	06/22/2011
Boron	4.90 mg/l	2.0 mg/l	03/24/2011
Boron	4.59 mg/l	2.0 mg/l	11/29/2010
Manganese	0.281 mg/l	0.15 mg/l	02/15/2012
Manganese	0.266 mg/l	0.15 mg/l	11/28/2011
Manganese	0.252 mg/l	0.15 mg/l	09/12/2011
Manganese	0.268 mg/l	0.15 mg/l	06/22/2011
Manganese	0.290 mg/l	0.15 mg/l	03/24/2011
Manganese	0.315 mg/l	0.15 mg/l	11/29/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

AMEREN, GRAND TOWER GENERATING STATION, ID:6285

VIOLATION NOTICE NO. W-2012-00062:

Violation

Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well APW-4 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.05 su	6.5-9.0 su	11/29/2010
Boron	2.97 mg/l	2.0 mg/l	02/15/2012
Boron	3.91 mg/l	2.0 mg/l	11/28/2011
Boron	6.17 mg/l	2.0 mg/l	09/12/2011
Boron	8.90 mg/l	2.0 mg/l	06/22/2011
Boron	7.01 mg/l	2.0 mg/l	03/24/2011
Boron	4.01 mg/l	2.0 mg/l	11/29/2010
Manganese	0.253 mg/l	0.15 mg/l	11/29/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.



Illinois EPA FOIA Exemption Reference Sheet

SID: 25140

Agency ID: Media File Type WATER

Bureau ID: W0770400003

Site Name: AMEREN-GRAND TOWER POWER STAT

Site Address1: 1820 Power Plant Rd

Site Address2:

Site City: Grand Tower

State: IL

Zip: 62942-

**This record has been determined to
be partially or wholly exempt from
public disclosure**

Exemption Type:

Exempt in Whole

Exempt Doc #: 7

Document Date: 9/12/2012

Staff: EAV

Document Description: INTERNAL DRAFT

Category ID: 08

Category Description: COMPLIANCE

Exempt Type: Exempt in Whole

Permit ID:

Date of Determination: 3/28/2013



**Grand Tower Station
(IL0000124) Monitor Wells
Jackson County**





2012

U.S. DEPARTMENT OF ENERGY
EPA - DIVISION OF RESTORATION AND REMEDIATION
RELEASEABLE

OCT 12 2012

REVIEWER EAV

Legend

-  Monitor Wells
-  County



- poss. be CCA
- most filled in
- maybe 3 years
- needs covered

SOURCE INFORMATION

Monitoring well data obtained from Ameren Energy. Bing maps obtained from ESRI. Map compiled and created by the groundwater section.

- take out of service - cover