



Ameren Services

August 14, 2012

CERTIFIED MAIL: 7011 3500 0001 1068 1251

IL Environmental Protection Agency
Division of Public Water Supplies
Attn: Andrea Rhodes, CAS #19
P.O. Box 19276
Springfield, IL 62794-9276

RECEIVED

AUG 17 2012

IEPA/CAS

RE: Violation Notices:

Grand Tower ID # 6285, VN # W-2012-00062
Newton ID # 6286, VN # W-2012-00063
Coffeen ID # 6287, VN # W-2012-00064
Meredosia ID # 6288, VN # W-2012-00065

Dear Ms. Rhodes:

Ameren Services submits this response as authorized agent for Ameren Energy Resources Company (AER). In accordance with provisions of the violation notices listed above that were received on July 2, 2012, we are requesting a meeting with IEPA to discuss details of the future actions necessary to reconcile the alleged violations. We believe this meeting will benefit both parties by providing a venue to openly discuss both the regulatory/enforcement elements, as well operational and temporal aspects of any future actions.

We believe our ability to provide detailed information to the agency at this time, including dates by which compliance will be achieved, is hampered by the absence of a broader groundwater characterization, the determinant need for a groundwater management zone (GMZ), and the absence of a thorough corrective action assessment. The matter is further complicated by the broad action required across the AER fleet, as well as considerations associated with pending federal regulations impacting both the management of coal combustion residues and changes to the steam electric effluent guidelines. These federal rules, which have not been finalized, will likely directly impact the viability of existing ash ponds and the need for alternative waste water treatment. A failure to appropriately consider the elements of these new rules relative to state compliance action will likely add unnecessary costs to any corrective action.

In closing, I want to reiterate our interest and commitment in engaging the agency on how best to reconcile the issues identified in the notices of violation. Please feel free to contact me or John Pozzo at 314.554.2280 at your convenience to schedule a meeting at a mutually agreeable time in the near future.

Sincerely,

Steven G. Whitworth
Manager, Environmental Services

cc: Marcia T. Willhite, Chief Bureau of Water
Julie Armitage, Acting Chief General Counsel

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

OCT 12 2012

REVIEWER EAV



Agency ID: Media File Type: WATER
Bureau ID: W0770400003
Site Name: AMEREN-GRAND TOWER POWER STAT
Site Address1:
Site Address2:
Site City: State: IL Zip:

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

Exemption Type:

Exempt in Whole

Exempt Doc #: 1

Document Date: 9 /6 /2012

Staff: EAV

Document Description: INTERNAL EMAIL: BUSCHER TO RHODES

Category ID: 08

Category Description: COMPLIANCE

Exempt Type: Exempt in Whole

Permit ID:

Date of Determination: 10/12/2012



Agency ID: Media File Type: WATER
Bureau ID: W0770400003
Site Name: AMEREN-GRAND TOWER POWER STAT
Site Address1:
Site Address2:
Site City: State: IL Zip:

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

Exemption Type:

Exempt in Whole

Exempt Doc #: 2

Document Date: 8 /31/2012

Staff: EAV

Document Description: INTERNAL EMAIL: CRUMLY TO WILLHITE ET AL

Category ID: 08 Category Description: COMPLIANCE
Permit ID:

Exempt Type: Exempt in Whole
Date of Determination: 10/12/2012



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:
Site Address2:
Site City: State: IL Zip:

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

Exemption Type:

Exempt in Whole

Exempt Doc #: 3

Document Date: 6 /18/2012

Staff: EAV

Document Description: BOW PROPOSED VN'S

Category ID: 08 Category Description: COMPLIANCE
Permit ID:

Exempt Type: Exempt in Whole
Date of Determination: 10/12/2012