



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 C. Whitworth  
Manager, Environmental Services

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

ENVIRONMENTAL DIVISION OF RECORDS MANAGEMENT  
CHICAGO

AUG 18 2012

REVIEWER EAV



Illinois EPA FOIA Exemption Reference Sheet

SID: 25142

Agency ID: 170001465082      Media File Type: WATER  
Bureau ID: W0798070001  
Site Name: Ameren Cips - Newton  
Site Address1: 6725 North 500th Street  
Site Address2:  
Site City: Newton      State: IL      Zip: 62448-

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

**Exemption Type:**

**Exempt in Whole**

**Exempt Doc #: 1**

**Document Date: 6 /18/2012**

**Staff: EAV**

**Document Description: BOW PROPOSED AN'S**

**Category ID: 08**

**Category Description: COMPLIANCE**

**Exempt Type: Exempt in Whole**

**Permit ID:**

**Date of Determination: 10/12/2012**



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 C. Whitworth  
Manager, Environmental Services

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

IEPA - DIVISION OF RECORDS MANAGEMENT  
RECEIVABLE

AUG 18 2012

REVIEWER EAV



Illinois EPA FOIA Exemption Reference Sheet

SID: 25141

Agency ID: Media File Type: WATER

Bureau ID: W1350150004

Site Name: AMEREN-COFFEEN 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: 6 /18/2012**

**Staff: EAV**

**Document Description: INTERNAL EMAIL: LOGAN-WILKEY TO CRUMLY**

**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: W1350150004

Site Name: AMEREN-COFFEEN 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: 6 /18/2012**

**Staff: EAV**

**Document Description: BOW PROPOSED VN'S**

**Category ID: 08**

**Category Description: COMPLIANCE**

**Exempt Type: Exempt in Whole**

**Permit ID:**

**Date of Determination: 10/12/2012**