



# 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

February 13, 2013

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

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

7010 2780 0002 1167 6062

Re: Notice of Intent to Pursue Legal Action  
Ameren Coffeen Generating Station  
Identification No.: 6287  
Violation Notice: W-2012-00064

**RECEIVED**

FEB 15 2013

**IEPA/CAS**

Dear Mr. Pozzo:

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

*Intervenor* Exhibit No. 318  
Date 3-31-2014 Reporter Stewart  
File No. EA-2012-0281



## ATTACHMENT A

AMEREN, COFFEEN GENERATING STATION, ID:6287

VIOLATION NOTICE NO. W-2012-00064:

**Violation****Description**

APW-2 continued

Parameter	Sample Value	GW Standard	Collection Date
TDS	1700 mg/l	1200 mg/l	05/04/2011
TDS	1600 mg/l	1200 mg/l	01/26/2011
TDS	1810 mg/l	1200 mg/l	12/01/2010

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-3 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.1 mg/l	2.0 mg/l	01/25/2012
Boron	2.5 mg/l	2.0 mg/l	01/26/2011
Boron	2.07 mg/l	2.0 mg/l	12/01/2010
Manganese	0.37 mg/l	0.150 mg/l	01/25/2012
Manganese	0.866 mg/l	0.150 mg/l	11/11/2011
Manganese	0.84 mg/l	0.150 mg/l	07/28/2011
Manganese	0.85 mg/l	0.150 mg/l	05/04/2011
Manganese	0.44 mg/l	0.150 mg/l	01/26/2011
Manganese	0.866 mg/l	0.150 mg/l	12/01/2010
Sulfate	830 mg/l	400 mg/l	01/25/2012
Sulfate	761 mg/l	400 mg/l	11/11/2011
Sulfate	940 mg/l	400 mg/l	05/04/2011
Sulfate	810 mg/l	400 mg/l	01/26/2011
Sulfate	761 mg/l	400 mg/l	12/01/2010
TDS	1900 mg/l	1200 mg/l	01/25/2012
TDS	1760 mg/l	1200 mg/l	11/11/2011
TDS	2100 mg/l	1200 mg/l	07/28/2011
TDS	1800 mg/l	1200 mg/l	05/04/2011
TDS	1800 mg/l	1200 mg/l	01/26/2011
TDS	1760 mg/l	1200 mg/l	12/01/2010

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, COFFEEN GENERATING STATION, ID:6287  
 VIOLATION NOTICE NO. W-2012-00064:

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.

ViolationDescription

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
Boron	7.4 mg/l	2.0 mg/l	01/25/2012
Boron	8.1 mg/l	2.0 mg/l	11/11/2011
Boron	6.3 mg/l	2.0 mg/l	07/28/2011
Boron	6.7 mg/l	2.0 mg/l	05/04/2011
Boron	7.2 mg/l	2.0 mg/l	01/26/2011
Boron	7.16 mg/l	2.0 mg/l	12/01/2010
Manganese	0.730 mg/l	0.150 mg/l	01/25/2012
Manganese	0.40 mg/l	0.150 mg/l	11/11/2011
Manganese	0.410 mg/l	0.150 mg/l	07/28/2011
Manganese	0.530 mg/l	0.150 mg/l	05/04/2011
Manganese	0.418 mg/l	0.150 mg/l	12/01/2010
Sulfate	840 mg/l	400 mg/l	01/25/2012
Sulfate	650 mg/l	400 mg/l	11/11/2011
Sulfate	840 mg/l	400 mg/l	05/04/2011
Sulfate	840 mg/l	400 mg/l	01/26/2011
Sulfate	833 mg/l	400 mg/l	12/01/2010
TDS	1600 mg/l	1200 mg/l	01/25/2012
TDS	1600 mg/l	1200 mg/l	11/11/2011
TDS	1600 mg/l	1200 mg/l	07/28/2011

## ATTACHMENT A

AMEREN, COFFEEN GENERATING STATION, ID:6287

VIOLATION NOTICE NO. W-2012-00064:

ViolationDescription

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
Boron	3.6 mg/l	2.0 mg/l	01/25/2012
Boron	3.9 mg/l	2.0 mg/l	11/11/2011
Boron	3.2 mg/l	2.0 mg/l	07/25/2011
Boron	3.9 mg/l	2.0 mg/l	05/04/2011
Boron	3.8 mg/l	2.0 mg/l	01/26/2011
Boron	3.54 mg/l	2.0 mg/l	12/01/2010
Manganese	0.460 mg/l	0.150 mg/l	01/25/2012
Manganese	0.670 mg/l	0.150 mg/l	11/11/2011
Manganese	0.740 mg/l	0.150 mg/l	07/25/2011
Manganese	0.81 mg/l	0.150 mg/l	05/04/2011
Manganese	0.240 mg/l	0.150 mg/l	01/26/2011
Manganese	0.78 mg/l	0.150 mg/l	12/01/2010
Sulfate	680 mg/l	400 mg/l	01/25/2012
Sulfate	450 mg/l	400 mg/l	11/11/2011
Sulfate	750 mg/l	400 mg/l	07/25/2011
Sulfate	650 mg/l	400 mg/l	05/04/2011
Sulfate	670 mg/l	400 mg/l	01/26/2011
Sulfate	600 mg/l	400 mg/l	12/01/2010
TDS	1300 mg/l	1200 mg/l	11/11/2011
TDS	1300 mg/l	1200 mg/l	07/25/2011
TDS	1300 mg/l	1200 mg/l	05/04/2011

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.







**Coffeen Power Station  
(IL0000108) Monitor Wells  
Montgomery County**



2012

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF POLLUTION MANAGEMENT  
RELEASE

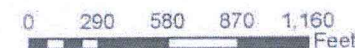
OCT 12 2012

REVIEWER EAV

**Legend**



Monitor Wells



*- Probably no CCA  
- long term / still using  
pond*

**SOURCE INFORMATION**

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

