

August 3, 2010

William E. Buscher, P.G.
Illinois Environmental Protection Agency
Groundwater Section
Division of Public Water Supplies
1021 North Grand Avenue
P.O. Box 19276
Springfield, IL 62794-9276



Dear Mr. Buscher:

Subject: Pending Proposal for a Groundwater Management Zone
AmerenUE Venice Station

In your letter of June 29th, you provided two comments on Ameren's Draft Groundwater Management Zone (GMZ) proposal dated March 25, 2010. Based on your comments and follow-up communications with Lynn Dunaway, we are submitting this letter as an addendum to our pending request, to clarify our original document and hopefully, to address your comments.

Comment 1

You identified one of a number of references (in our original submittal) to local groundwater ordinances and their potential use as institutional controls. However, as you clarified, institutional controls are not required for the establishment of a GMZ. Further, although five communities located in St. Clair and Madison counties have enacted groundwater use restriction ordinances, we recognize that most are not directly applicable to Ameren's Venice Plant closure activities and that some have not been reviewed by the Illinois EPA Division of Legal Council, which is required in order to be used as an institutional control.

Ameren is seeking approval to initiate closure activities next year and while we consider establishment of a GMZ as an essential first step to authorize installation of the proposed cap and cover, we do not need and thus amend our prior submittal to rescind our request to manage groundwater use/exposure in the area through institutional controls.

We reserve the option to seek approval in the future, to implement use of institutional controls for management of site conditions, or as might be helpful in establishing alternative site-specific groundwater standards if deemed appropriate.

Comment 2

As described in our original request, the existing monitoring well network does not fully meet our needs for ash pond closure while some existing wells no longer provide relevant data. A total of nine new wells were proposed along with the elimination (permanent abandonment) of two existing wells. Four of the proposed wells are located on Terminal Railroad Association property, south of the ash ponds. We did not believe it would be prudent to initiate discussions with the Railroad to modify our monitoring easement or move forward with installation of the new wells until IEPA made clear its position on our proposal.

We are prepared to move forward without delay, to install the proposed wells. In the meantime, consistent with the request in your letter, we have expanded the parameters monitored in our current network to all of those listed in 35 IAC 620.410(a) and (d) other than radium 226 and 228. Ameren is continuing to collect groundwater samples from the existing network on a quarterly basis (without regard to the expiration of the permit requiring monitoring). We note that MW4, was recently abandoned (removed and grouted) as a condition of providing unimpeded easement to the Illinois Department of Transportation as part of the new Mississippi River bridge project. (A second well, MW5 was just off the easement centerline, and was protected with a concrete slab and at-grade caps and covers.)

In follow-up correspondence with Lynn Dunaway, he also requested that Ameren identify the statistical approach we planned to establish background groundwater concentrations. Ameren plans to calculate background statistics in a manner consistent with 811.320(d) and (e). Specifically, we will base background on a minimum of four consecutive quarterly samples from wells that show no effects of impacts from the Venice ash ponds (based on boron and sulfate concentrations). Analytical results lower than the PQL will be processed as outlined under 811.320(e). An appropriate statistical test (e.g., tolerance interval or confidence interval and non-parametric forms of these tests) will be selected on a constituent-by-constituent basis, based on the detection frequency and data distribution for each constituent.

Further, Ameren intends to provide documentation of the proposed statistical approach for evaluating compliance with off-site and on-site groundwater quality standards in the Closure Plan. For this analysis, we envision a trend-based approach similar in concept to that described in the proposed site specific rule for Hutsonville Station, Section 840.116.

Please do not hesitate to contact me, or Michael Bollinger, if you have any additional questions. We thank you in advance for your prompt response to this addendum, as we continue plan development in anticipation of initiating closure next year.

Sincerely,

Michael F. Bollinger /

John C. Pozzo, Managing Supervisor
Water Quality

cc: Lynn Dunaway

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File: WQ 3.13.4