AMEREN MISSOURI: Meramec Energy Center

Notice of Intent to Initiate Closure of the Inactive Surface Impoundment MCPE (Pond 489)

Rev	Date	Revisions	Originator	Reviewer	Approver
0	12-09-15	Initial Issue	C. J. Giesmann		RCS 12-9-15

In 2000, Ameren Missouri constructed a 25-acre surface impoundment (denominated as pond #489 on technical drawings), for the management of coal ash materials generated at the Meramec Energy Center. While a synthetic (HPDE) liner was used in the construction of pond # 489, such liner system does not comply with the performance requirements set forth in the CCR Rule. Ameren Missouri intends to complete closure activities no later than April 17, 2018, effectively exempting the impoundment from all other CCR requirements. §40 CFR 257.100(b).

A closure plan encompassing technical analysis and engineering drawings is under development. Closure of Unit #489 will follow the engineering design and construction processes required by §40 CFR 257 and include the following elements:

1. CCR material will be left in place.
2. CCR material within the unit # 489 will be exposed to precipitation events until such time as the cap system is installed. Closure activities will include an assessment of saturation within the unit and whether additional dewatering activities are necessary to remove free liquids or to compact and stabilize the underlying ash material to support the final cover system. Measures will be taken to minimize post-closure infiltration of liquids.
3. Storm water will be routed to newly designed drainage systems so as to minimize water infiltration.
4. Material within the impoundment will be sloped and graded. Site specific slopes will be determined for the exterior embankment and the cap.
5. The impoundment will be covered with a cap system comprised of earthen materials (or other approved materials) and a synthetic liner designed to a performance standard of no less than 1×10^{-5} permeability. The cap will be covered with soil sufficient to support vegetative growth or other approved materials so as to minimize erosion. Excess embankment materials, if any, will be evaluated for use within the vegetative cover on the final cap.
6. Structural integrity analyses of the impoundment in the closed condition will be performed. Appropriate factors of safety will be defined to the following stability criteria: short and long term slope stability analysis (exterior berm and capping materials); seismic event slope stability (exterior embankment and cover materials); bearing capacity and maximum induced settlement.
7. A construction quality assurance (CQA) plan will be developed to verify construction occurs in accordance with project plans and specifications.

Set forth below is a preliminary schedule for the development and execution of a closure plan encompassing the above elements.

2016 – Detailed Engineering Design, Bidding

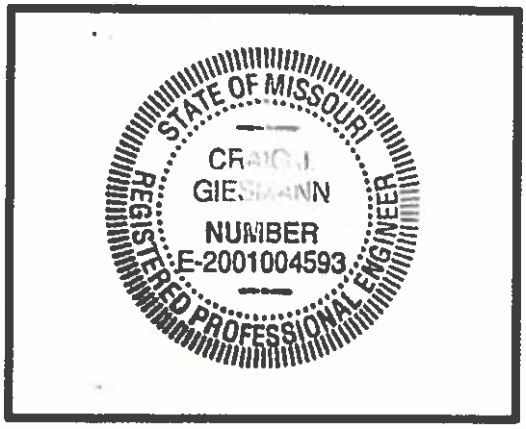
2017 – Construction

- Dewatering
- Drainage Improvement Installation
- Site Contouring
- Cap and Cover Installation

2018 – Project Completion prior to April 17th

PROFESSIONAL ENGINEER CERTIFICATION

The following PE Certification is certifying that the design of the final cover system will meet the requirements of 40 CFR 257.100(b)(3)(ii) and that the closure in place, 40 CFR 257.100(b)(1) through (4), of the inactive surface impoundment is technically feasible to be completed by April 17, 2018.



CRAIG J. GIESMANN

Printed Name of Professional Engineer

Craig J. Giesmann

Signature

E-2001004593 MO 12-9-15

Registration No. **Registration State** **Date**