

REPORT
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**MERAMEC ENERGY CENTER
CCR SURFACE IMPOUNDMENT
REQUEST FOR A SITE-SPECIFIC ALTERNATIVE
CLOSURE DATE
ANNUAL PROGRESS REPORT**

Prepared for



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Ameren Missouri
Meramec Energy Center
CCR Surface Impoundment
Request for a Site-Specific Alternative Closure Date
Annual Progress Report

1. INTRODUCTION

On August 28, 2020, the U.S. Environmental Protection Agency (EPA) issued revisions to the CCR Rule that require all unlined surface impoundments to initiate closure by April 11, 2021, unless an alternative deadline is requested and approved. 40 C.F.R. § 257.101(a)(1). Specifically, the CCR Rule authorizes the continued use of CCR Surface Impoundments if the facility will cease operation of the coal-fired boiler(s) and complete closure of the impoundments within certain specified timeframes. 40 C.F.R. § 257.103(f)(2) “Permanent Cessation of a Coal-Fired Boiler(s) by a Date Certain”.

On November 27, 2020, Ameren Missouri (Ameren) submitted a request to the EPA, pursuant to 40 C.F.R. § 257.103(f)(2), for approval of a site-specific alternative deadline for closure of CCR Surface Impoundments MCPA, MCPB and MCPD at Ameren’s Meramec Energy Center (Meramec or MEC). To date, the EPA has not approved this request. In accordance with 40 C.F.R. § 257.103(f)(2)(x), Ameren has prepared the following Annual Progress Report to document the continued lack of alternative capacity and the progress towards the closure of these CCR surface impoundments at the MEC. Ameren will place this Progress Report in the facility’s operating record as required by 40 C.F.R. § 257.105(i)(20).

2. ANNUAL PROGRESS REPORT

In their November 2020 request for approval of a site-specific alternative deadline for closure of MCPA, MCPB and MCPD, Ameren stated that the MEC facility is scheduled to be retired and permanently cease generating electric power by December 31, 2022. The MEC provides critical voltage support to the transmission system and must be able to continue to perform this critical reliability function through the end of 2022 while transmission upgrades occur elsewhere in the system. The planned date for permanent cessation of the coal-fired boiler(s) at the MEC remains unchanged at December 31, 2022.

MCPA, MCPB and MCPC are used to manage sluiced bottom and economizer ash (CCRs), wastewaters (non-CCR) from the Energy Center's Combined Drain Sump (CDS), monitoring well purge water, coal pile runoff, and stormwater runoff. Ameren demonstrated in their November 2020 request to the EPA that the interconnected MCPC, MCPA, and MCPB impoundment must remain operational and continue to receive and manage these waste streams until the MEC ceases generating electricity; and pursuant to 40 C.F.R. § 257.103(f)(2), requested that they be allowed to complete closure of this 18.9-acre CCR impoundment no later than October 17, 2023. Because the MEC will continue to operate the coal-fired boiler(s) at the MEC through December 31, 2022, the requested date for completing closure of MCPC, MCPA, and MCPB at the MEC remains unchanged at October 17, 2023.

Ameren is systematically closing the CCR Surface Impoundments at the MEC as reflected in Figure 1. CCR Surface Impoundment MCPD stopped receiving fly ash before April 11, 2021 and was closed by October 7, 2021. In preparation for closure of the remaining CCR Surface Impoundments (MCPC, MCPA, and MCPB), Ameren has evaluated alternatives and is completing on-site infrastructure improvements and applicable permit modifications to remove all CCR and non-CCR water discharges

As required by 40 C.F.R. § 257.103(f)(2)(i), Ameren previously demonstrated that no alternative disposal capacity is currently available for the waste streams that are presently managed in MCPA, MCPB, and MCPC. This lack of alternative disposal capacity remains unchanged for the reasons documented in Ameren's original November 2020 request to the EPA. Since April 2021, fly ash produced at the MEC has and will continue to be beneficially used onsite for closing MCPD and/or MCPA, MCPB, and MCPC, or transported off-site for disposal. However, the MEC will continue to produce wet waste streams that can only be managed in the existing surface impoundment system.

As required by 40 C.F.R. § 257.103(f)(2)(ii), Ameren previously provided a copy of the MEC's Corrective Measures Assessment Report to show that potential risks to human health and the environment from the continued operation of the CCR surface impoundment have been adequately mitigated. As part of this corrective measures assessment, Ameren evaluated in situ treatment options to address groundwater impacts at its Energy Center sites and is in the process of demonstrating the effectiveness of the treatment technology.

As required by 40 C.F.R. § 257.103(f)(2)(iii), Ameren previously certified in November 2020 that the MEC facility is in compliance with the CCR rule, including the requirement to conduct any necessary corrective action. This certification is unchanged and remains valid.

Ameren previously demonstrated in November 2020 that the criteria in § 257.103(f)(2)(iv) has been met for the MEC by submitting the Closure Plans for CCR Surface Impoundments MCPA, MCPB, and MCPC, and a narrative that specified and justified the date by which they intend to cease receipt of waste into these CCR units in order to meet the October 17, 2023 closure deadline. This previous demonstration is unchanged and remains valid.