UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 7, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Chester Cardwell, Plant Manager
Sikeston Power Station
P.O. Box 370
Sikeston, Mo. 63801

Dear Mr. Cardwell,

On April 28, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Sikeston Power Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain “wet” handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Sikeston Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Sikeston Power Station facility is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Sikeston Power Station facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by February 7, 2011. Please send your response to:

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight of hand delivery mail, please use the following address:

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-237
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

6.1. URGENT ACTION ITEMS

None of the recommendations are considered to be urgent, since the issues noted above do not appear to threaten the structural integrity of the impoundment in the near term.

6.2. LONG TERM IMPROVEMENT

The deficient conditions observed during the inspection do not require immediate attention, but additional investigations/analyses and corrective actions should be implemented in the near future as part of a regular maintenance plan. The recommended maintenance/improvement actions are described below:

Bottom Ash Pond

-Outboard slopes – remove deleterious vegetation and continue regular maintenance of the slopes.
-Outboard toe – Implement plan to replace the ditch with drain piping along the toe to improve drainage.
-Inboard slopes – remove the small trees growing along the northern portion of the embankment. Keep vegetation under control to allow for visual inspection of the exposed portion of the slope above the waterline.
-Additional studies – perform geotechnical investigation, cross-sectional topographic survey, and slope stability analyses of critical slopes. Install piezometers to monitor phreatic levels within the embankment. Analyze for normal pool with steady state seepage, maximum surcharge pool, and seismic loading conditions.

Fly Ash Pond

-Outboard slopes – remove deleterious vegetation and continue regular maintenance of the slopes.
-Outboard toe – Implement plan to replace the ditch with drain piping along the toe to improve drainage.
-Inboard slopes – keep vegetation under control to allow for visual inspection of the exposed portion of the slope above the waterline.
-Repair or replace the slide gate operator stems.
-Additional studies – perform geotechnical investigation, cross-sectional topographic survey, and slope stability analyses of critical slopes. Install piezometers to check phreatic levels within the embankment. Analyze for normal pool with steady state seepage, maximum surcharge pool, and seismic loading conditions. Installation of the piezometers will help to verify if the wet area near the outlet structure is the result of seepage through or beneath the embankment or is perched groundwater or stagnant surface water.

6.3. MONITORING AND FUTURE INSPECTION

Consideration should be given to regular inspections by licensed dam safety engineers to document the continued proper maintenance and operation of the Bottom Ash and Fly Ash Ponds. Consideration should be given to development of an O&M Plan that would establish a firm schedule for operations, maintenance, and inspection activities.

6.4. TIME FRAME FOR COMPLETION OF REPAIRS/IMPROVEMENTS

Based on conversations with representatives of the BMU, funds for improving a section of the drainage ditch are budgeted in the Capital Improvements plan for the next fiscal year. It is O'Brien & Gere's recommendation that the owner continue toward this schedule as planned. It is recommended that the other improvements and stability analyses recommended above be completed in a timely manner.