NPDES Permit No. IL0000175 Notice No. JAR:13073001.jar

Public Notice Beginning Date: December 10, 2014

Public Notice Ending Date: January 9, 2015

National Pollutant Discharge Elimination System (NPDES)
Permit Program

Draft Reissued NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency Bureau of Water, Division of Water Pollution Control Permit Section 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276 217/782-0610

Name and Address of Discharger: Name and Address of Facility:

AmerenUE Venice Energy Center 1901 Chouteau Ave., MC-602 701 Main Street P.O. Box 66149 Venice, IL 62090 St. Louis, MO 63166 (Madison County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES permit to discharge into the waters of the state and has prepared a draft permit and associated fact sheet for the above named discharger. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. The last day comments will be received will be on the Public Notice period ending date unless a commentor demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the draft permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the permit applicant. The NPDES permit and notice number(s) must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final permit is issued. For further information, please call Jaime Rabins at 217/782-0610.

The applicant is engaged in the generation of electricity using natural gas fired combustion turbines (SIC 4911). Wastewater is generated by periodically discharging evaporative cooler water to maintain correct water chemistry, shop drains from the shop area, and precipitation which contacts the capped ah ponds. Plant operation results in an average discharge of 0.0144 MGD of evaporative cooler blowdown and shop drains from outfall 001, and an intermittent discharge of stormwater from the north capped ash pond and south capped ash pond.

The following modifications are proposed:

- 1. A new outfall, 010 is proposed for the intermittent discharge of stormwater from the north capped ash pond.
- 2. A new outfall, 011 is proposed for the intermittent discharge of stormwater from the south capped ash pond.

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Application is made for the existing discharges which are located in Madison County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude		Longitude		Stream Classification	Biological Stream Characterization
009	Mississippi River	38° 39' 26"	North	90° 10' 33"	West	General Use	Not Rated
010	Mississippi River	38° 39' 13"	North	90° 10' 31"	West	General Use	Not Rated
011	Mississippi River	38° 39' 02"	North	90° 10' 31"	West	General Use	Not Rated

To assist you further in identifying the location of the discharge please see the attached map.

The waterbody segment J-02 receiving the discharge from outfall(s) 009, 010, and 011 is on the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List. The receiving water has not been given an integrity rating or been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The impaired designated uses and pollutants causing impairment are tabulated below:

<u>Designated Uses</u>	Pollutants Causing Impairment
Fish Consumption	Mercury and Polychlorinated biphenyls (PCBs)
Food Processing Water Supply	Manganese

The discharge(s) from the facility shall be monitored and limited at all times as follows:

Outfall: 009 Evaporative Cooler Blowdown and Shop Drains (DAF = 0.0144 MGD)

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		_	
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	
Flow (MGD)							
рН						35 IAC 304.125	
Temperature						35 IAC 309.146	
Total Suspended Solids				15	30	35 IAC 304.124	
Oil and Grease				15	30	35 IAC 304.124	
Total Residual Chlorine					0.05	35 IAC 302.208	
Fluoride				Monitor Only		35 IAC 309.146	

The following explain the conditions of the proposed permit:

The discharge (0.0144 MGD) flows into a large river (46,500 cfs) and thus no reasonable potential to exceed thermal water quality standards exist outside of mixing. Allowed mixing will be granted for the thermal discharges from this facility.

The special conditions clarify: flow, pH, temperature, monitoring location, TRC, DMRs, re-opener, and water treatment additive usage.

Antidegradation Assessment for AmerenUE, Venice Energy Center NPDES Permit No. IL0000175 Madison County

The subject facility completed closing an approximately sixty acre ash pond during December 2012. The cap consists of a geosynthetic liner will approximately 3 feet of clean soil. The soil cap will be fully vegetated with grasses. The facility has applied for two new outfalls for the discharge of storm water from the cap. The stormwater will not have contact with the ash constituents.

Identification and Characterization of the Affected Water Body.

The subject facility proposes to discharge to the Mississippi River at a point where 46,500 cfs of flow exists upstream of the outfall during critical 7Q10 low-flow conditions. The Mississippi River is classified as a General Use Water. The Mississippi River is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*, nor is it given an integrity rating in that document. The Mississippi River, Waterbody Segment, J-02, is listed on the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for fish consumption use with potential causes given as mercury and polychlorinated biphenyls and public and food processing water supply use with potential cause given as manganese. Aquatic life and primary contact recreation uses are fully supported. This segment of the Mississippi River is subject to enhanced dissolved oxygen standards.

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

Dissolved solids loading will increase to the Mississippi River to a very slight degree. The increase will be imperceptible in the river and will cause no impact on any use.

Fate and Effect of Parameters Proposed for Increased Loading.

The suspended solids discharged will remain in the stream.

Purpose and Social & Economic Benefits of the Proposed Activity.

The proposed project will prevent stormwater from contacting the coal ash.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

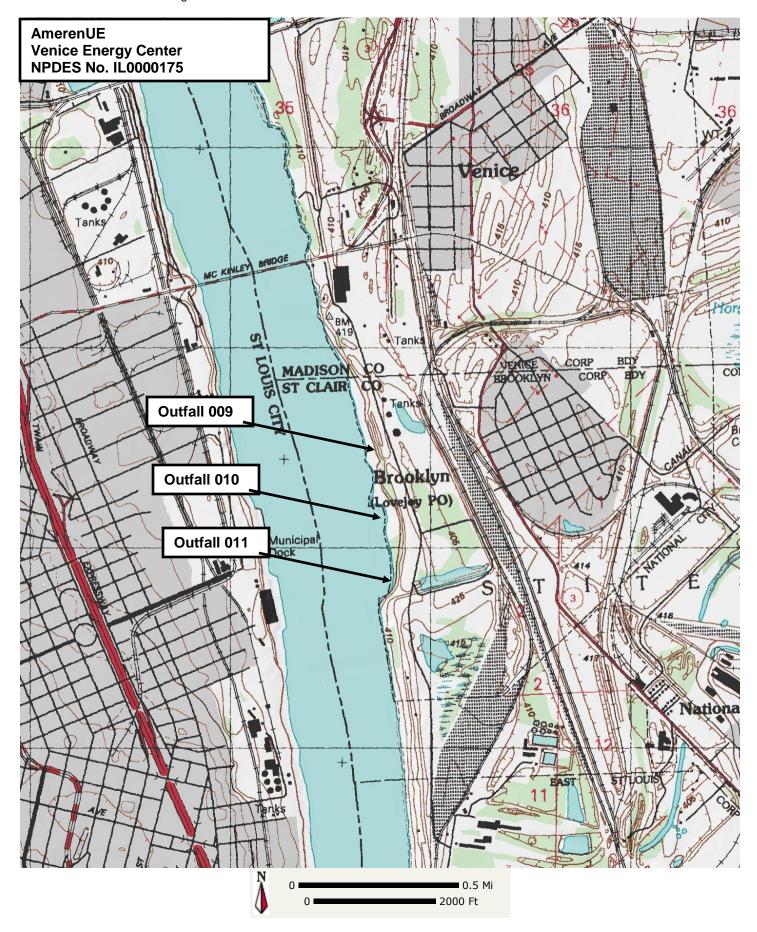
The plan for construction of the soil cap is consistent with appropriate technology for this size and type of project. The closure plan has been selected to avoid or minimize environmental impacts. Viable alternatives to the selected treatment process do not exist for this project.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities.

On July 26, 2012, the IDNR EcoCAT web-based tool was used and indicated that there were endangered/threatened species (Peregrine Falcon (*Falco peregrinus*) and Western Sand Darter (*Ammocrypta clarum*)) present in the vicinity of the discharge. While the IDNR EcoCAT web-based tool did not terminate the consultation because of the near-by presence of endangered/threatened species, future termination is likely since the discharge will only be stormwater.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the draft permit was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all existing uses of the receiving stream will be maintained; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the community at large by prevent stormwater from contacting the coal ash. Comments received during the NPDES permit public notice period will be evaluated before a final decision is made by the Agency.



Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: Issue Date: Effective Date:

Name and Address of Permittee: Facility Name and Address:

AmerenUE Venice Energy Center 1901 Chouteau Ave., MC-602 701 Main Street P.O. Box 66149 Venice, IL 62090 (Madison County)

Discharge Number and Name:

Receiving Waters:

OUNDER Evaporative Cooler Blowdown and Shop Drains

Mississippi River

OUNDER Cooler Blowdown and Shop Drains

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Alan Keller, P.E. Manager, Permit Section Division of Water Pollution Control

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Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall: 009 Evaporative Cooler Blowdown and Shop Drains (DAF = 0.0144 MGD)

		ITS lbs/day (DMF)	CONCENTRATION LIMITS mg/I			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Flow (MGD)	See Special Condition 1				2/Month	
pH	See Special Condition 2				2/Month	Grab
Temperature	See Special Co	ndition 3			2/Month	Single Reading
Total Suspended Solids			15	30	2/Month	Grab
Oil and Grease			15	30	2/Month	Grab
Total Residual Chlorine	See Special Co	ndition 4		0.05	2/Month	Grab
Fluoride		Monitor Only		1/Quarter	Grab	

Quarterly sampling results shall be submitted with the March, June, September and December DMRs.

Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall: 010 Stormwater from the North Capped Ash Pond (Intermittent Discharge) 011 Stormwater from the South Capped Ash Pond (Intermittent Discharge)

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Flow (MGD)	See Special Condition 1				1/Month	

See Special Condition 10.

Special Conditions

<u>SPECIAL CONDITION 1</u>. Flow shall be measured in units of Million Gallons per Day (MGD) and reported as a monthly average and a daily maximum value on the monthly Discharge Monitoring Report.

<u>SPECIAL CONDITION 2</u>. The pH shall be in the range 6.0 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

<u>SPECIAL CONDITION 3</u>. This facility meets the allowed mixing criteria for thermal discharges pursuant to 35 IAC 302.102. No reasonable potential exists for the discharge to exceed thermal water quality standards. The permittee shall monitor the flow and temperature of the discharge prior to entry into the receiving water body. Monitoring results shall be reported on the monthly DMR. This permit may be modified to include formal temperature limitations should the results of the monitoring show that there is a reasonable potential to exceed a thermal water quality standard. Modification of this permit shall follow public notice and opportunity for comment.

<u>SPECIAL CONDITION 4.</u> All samples for total residual chlorine (TRC) shall be analyzed by an applicable method contained in 40 CFR 136, equivalent in accuracy to low-level amperometric titration. Any analytical variability of the method used shall be considered when determining the accuracy and precision of the results obtained.

<u>SPECIAL CONDITION 5</u>. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

<u>SPECIAL CONDITION 6</u>. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) Forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (NetDMR) instead of mailing paper DMRs to the IEPA. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using NetDMR shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency Division of Water Pollution Control 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

<u>SPECIAL CONDITION 7</u>. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

<u>SPECIAL CONDITION 8</u>. In the event that the permittee must request a change in the use of water treatment additives, the permittee must request a change in this permit in accordance with Standard Conditions - - Attachment H.

SPECIAL CONDITION 9. The use or operation of this facility shall be by or under the supervision of a Certified Class K operator.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from outfall 010 and 011 for the following parameters on a semi-annual basis. Sampling data for a specific parameter required by other conditions of this permit may be used to satisfy this sampling requirement. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted to the address in special condition 6 in June and December. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

	Minimum
PARAMETER	reporting limit
Boron	0.01 mg/L
Chloride	1.0 mg/L
Manganese	0.5 mg/L
Mercury (grab)**	1.0 ng/L*
	Boron Chloride Manganese

Special Conditions

00945	Sulfate	1.0 mg/L
01092	Zinc	0.025 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

<u>SPECIAL CONDITION 11.</u> The permittee shall conduct a quarterly inspection of the ash pond cap and submit an annual report on the inspections to the address in special condition 6 in December of each year. This Permit may be modified with public notice to establish increased sampling and/or effluent limitations, based on the information obtained.

^{*1.0} ng/L = 1 part per trillion.

^{**}Utilize USEPA Method 1631E and the digestion procedure described in Section 11.1.1.2 of 1631E.