EARTHJUSTICE

Missouri Coal Ash Disposal in Ponds and Landfills

Summary of Coal Ash Generating Facilities in MO:[i]

Plant	Operator	Disposal Unit	County
Asbury Power Station	Empire District Electric Co.	1 pond	Jasper
Blue Valley Power Station	City of Independence	3 ponds	Jackson
Hawthorn Generating Station	Kansas City Power & Light Co.	1 pond	Jackson
Iatan Power Station	Kansas City Power & Light Co.	1 pond	Platte
Labadie Power Station	Ameren UE	2 ponds	Franklin
Lake Road Generating Station	Aquila Networks-Missouri	2 ponds	Buchanan
Meramec Power Station	Ameren UE	4 ponds	St. Louis
Montrose Generating Station	Kansas City Power & Light Co.	1 pond/landfill*	Henry
New Madrid Power Station	Associated Electric Co-op Inc.	4 ponds	New Madrid
Rush Island Power Station	Ameren UE	1 pond	Jefferson
Sibley Generating Station	Aquila Networks-Missouri	2 ponds/landfill*	Jackson
Sikeston Power Station	City of Sikeston	2 ponds	Scott
Sioux Power Station	Ameren UE	2 ponds/landfill*	St. Charles
Thomas Hill Energy Center	Associated Electric Co-op Inc.	6 ponds/landfill*	Randolph
James River Power Station (SPCIUT)	City of Springfield	landfill*	Greene
Southwest Power Station (Southwest II)	City of Springfield	landfill*	Greene
University of Missouri Columbia	University of Missouri Columbia		Boone
Chamois	Central Electric Power Coop		Osage
Columbia	City of Columbia		Boone
Marshall	City of Marshall		Saline
Missouri City	City of Independence		Clay

*indicates one or more coal ash landfills.[ii]

Amount of coal ash generated per year: 2.68 million tons. Missouri ranks 16th in the country for coal ash generation. [iii]

Coal Ash Ponds in MO

Number of Coal Ash Ponds: Approximately 32 ponds at 14 plants.[iv]

Pond Ratings: One pond is rated "high" hazard (meaning that failure is likely to take human lives), and five ponds are rated "significant" hazard (meaning that a failure would cause economic and/or environmental damage).[v] Twenty-one of the ponds are over 30 years old.[vi] The age of these ponds makes it unlikely that they have safeguards like liners and leachate collection systems.

Capacity: According to the EPA surface impoundment database, Missouri's coal ash ponds cover an area of over 1,000 acres. [vii] The 19 ponds for which EPA has storage capacity data can hold over 48 million cubic yards of coal ash.

EPA Dam Inspection Results: Three coal ash ponds at the Ashbury Power Station were recently rated "poor" by EPA inspectors during EPA's latest round of dam inspections.[viii] One of these coal ponds is a significant-hazard rated pond.

Documented lack of Safeguards: According to a 2007 EPA risk assessment, the Meramec plant in St. Louis County has no liner, and the Blue Valley plant has only a clay liner. The Meramec plant does not have a leachate collection system or groundwater monitoring, and the Blue Valley plant did not provide any data about its leachate collection system or groundwater monitoring.[ix]

Deficiencies in Missouri's Regulatory Program:

In Missouri, only the largest, most dangerous of the state's 32 coal ash ponds are regulated for dam safety. Amazingly, Missouri allows ponds impounding more than 170 million gallons of coal ash to escape safety regulations. This amount is roughly equivalent to 35,000 bathtubs full of coal ash or an area the size of Washington's National Mall covered in sludge about two feet deep. Furthermore, Missouri has not assigned a hazard rating to a single coal ash impoundment in the state. (Although EPA has recently assigned one pond a high hazard rating and rated five ponds significant hazard.) Fourteen of Missouri's coal ash ponds are over 25 feet high or impound more than 500 acre feet, yet state regulators have inspected only one pond in the past five years, despite the fact that about half the ponds were not constructed by professional engineers and fewer than half are currently monitored by professional engineers.

Other key safety regulations are also missing in Missouri. State regulations do not require regular inspections by dam safety officials. Missouri regulations also do not require groundwater monitoring or composite liners at all ponds and landfills, nor do the regulations prohibit dumping directly into the water table or require bonds to ensure cleanup at coal ash landfills.

These deficiencies are threatening Missouri's environment. The Missouri Department of Natural Resources (DNR) has known since 1992 that a 154-acre, unlined ash pond at Ameren's Labadie plant – the largest coal plant in the state and the 14th largest coal plant in the nation – has been leaking some 50,000 gallons per day. DNR has not required groundwater monitoring or cleanup, despite the threat to the local population that relies on groundwater for drinking water and agricultural use. DNR has also allowed the plant to continue operating under a 1994 NPDES permit, which technically expired in 1999, without issuing an updated renewal permit to require groundwater monitoring and cleanup.

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[i] U.S. EPA. Database of coal combustion waste surface impoundments (2011). Information collected by EPA from industry responses to Information Collection Request letters issued to the companies 2009- 2011, available at http://www.epa.gov/osw/nonhaz/industrial/special/fossil/surveys/index.htm .

[ii] U.S. Department of Energy's Energy Information Administration, Form EIA-767, Annual Steam-Electric Plant Operation and Design Data. 2005.

[iii] U.S. EPA and United States Department of Energy (U.S. DOE). *Coal Combustion Waste Management at Landfills and Surface Impoundments, 1994-2004* (August 2006).

[iv] U.S. EPA. Database of coal combustion waste surface impoundments (2011).

[v] *Id.*

[vi] *Id.*

[vii] U.S. EPA. Database of coal combustion waste surface impoundments (2009).

[viii] US EPA. Coal Combustion Residuals Impoundment Assessment Reports, available at http://www.epa.gov/osw/nonhaz/industrial/special/fossil/surveys2/index.htm.

[ix] RTI International. *Human and Ecological Risk Assessment of Coal Combustion Wastes, Draft* (August 6, 2007), prepared for the US Environmental Protection Agency.