

February 14, 2020

Project No. 18113500

Erik Booth and Paul Cederquist
Grand Haven Board of Light and Power
J.B. Sims Generating Station
1231 N. 3rd Street
Harbor Island, Grand Haven, MI 49417

PERMANENT CESSATION OF A COAL FIRED BOILER BY A DATE CERTAIN NOTIFICATION PER 40 CFR 257.103

Dear Mr. Booth and Mr. Cederquist

This letter has been prepared to serve as notification that the J.B. Sims Generating Station's (JBSGS) coal fired boiler units have permanently ceased operation as of February 13, 2020. The JBSBS is owned and operated by the Grand Haven Board of Light and Power (GHBLP) and is located on Harbor Island in Grand Haven, Michigan.

On July 8, 2019, the GHBLP issued a notification and documentation of "No Alternative Disposal Capacity" to the site's operating record, pursuant to Title 40 of the Code of Federal Regulations Section 257 (40 CFR 257), Section 103. The "No Alternative Disposal capacity" demonstration per 40 CFR 257.103 outlined specific conditions that must be met to qualify for continued operation of the Unit 3 East and West Bottom Ash Impoundments at JBSGS. In that July 8, 2019 notification, the GHBLP certified that the JBSGS would cease operations of the coal-fired boilers by June 2020, however, operations of the boilers were ceased on February 13, 2020.

Per 40 CFR 257.103(b)(2), "for a CCR surface impoundment that is 40 acres or smaller, the coal-fired boiler must cease operation and the CCR surface impoundment must have completed closure no later than October 17, 2023". The GHBLP JBSGS Board has certified and announced that coal-fired boiler operations have ceased on February 13, 2020, as required by 40 CFR §257.103(b)(1) and (b)(2). The Unit 3 East and West Bottom Ash Impoundments will remain operational during the demolition of the plant and CCR removal from the Units 1 and 2 Inactive Ash Impoundments. Closure of the CCR Units located at the site has been initiated and will be completed no later than October 17, 2023.

Sincerely,

Golder Associates Inc.

Tiffany D. Johnson, P.E.

Principal

David M. List, P.E.

Principal