



March 2, 2021

20437025

Timothy Unseld and Kent Walters

Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341

**RESPONSE TO EGLE FEBRUARY 3, 2021 MIXING ZONE LETTER RE: FORMER J.B. SIMS POWER PLANT,
HARBOR ISLAND, GRAND HAVEN, MICHIGAN**

Dear Mr. Unseld and Mr. Walters:

Golder Associates Inc. (Golder) is sending this letter on behalf of the Grand Haven Board of Light and Power (GHBLP) in response to the February 3, 2021 letter from the Michigan Department of Environment, Great Lakes and Energy (EGLE) regarding the Request for a Mixing Zone Determination (MZD) for the J.B Sims Generating Station (JB Sims).

On October 28, 2020, Golder Associates Inc. (Golder) sent a Request for a Mixing Zone Determination to the EGLE Materials Management Division (MMD), as MMD has been the point of contact for coal combustion residuals (CCR) issues relating to the JB Sims Site. However, in retrospect, it appears that sending this request to MMD led to a misunderstanding for which we apologize. The MZD request was made as part of the intended remedial action plan (RAP) for the JB Sims Site, which is comprised of the western portion of Harbor Island in Grand Haven, Michigan. At this time, we would like to defer this request for future discussions with the EGLE Remediation and Redevelopment Division (RRD) and/or MMD (depending on the future CCR closure plans for the site) for the site-wide remediation strategy for JB Sims which will follow and which is not the same as the CCR unit closures.

MMD's correspondence dated February 3, 2021 raised questions responding to the MZD request regarding the monitoring well networks for the CCR units at the site. Despite deferring the MZD request, Golder and GHBLP agree that, following the revised inactive Unit 1/2 impoundment boundary determination, the monitoring network should be modified, given the variability in groundwater flow conditions at the site. In the meeting that was held on January 14, 2021, the Inactive 1/2 Impoundment boundary was discussed and a revised boundary delineation agreed on by EGLE, the USEPA, and GHBLP. As such, Golder has prepared a "draft" monitoring well network map that we would like to discuss with EGLE in a virtual meeting prior to a formal submittal of the work plan for a revised monitoring well network. This "draft" monitoring well network plan view is attached for your review prior to our virtual meeting. We would also like to request that the "draft" plan be informally shared with EGLE's

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colleagues at the USEPA so that we may come to agreement with all parties involved for the CCR units at the site.

GHBLP stresses that the prior requested mixing zone was not intended to become part of the closure for either of the specific CCR units but, rather, to be a part of a site-wide RAP. Indication of whether a MZD can be considered as part of a RAP for GHBLP is an important decision tool to address site-wide risks to human health and the environment. GHBLP will request an RRD and/or MMD evaluation of the mixing zone request in preparation for the implementation of a site-wide RAP.

On behalf of the GHBLP, we appreciate MMD's attention to this request. Please contact either of us for further discussion.

Sincerely,

Golder Associates Inc.



David P. Regalbuto, CPG
Associate



Tiffany D. Johnson, P.E.
Principal

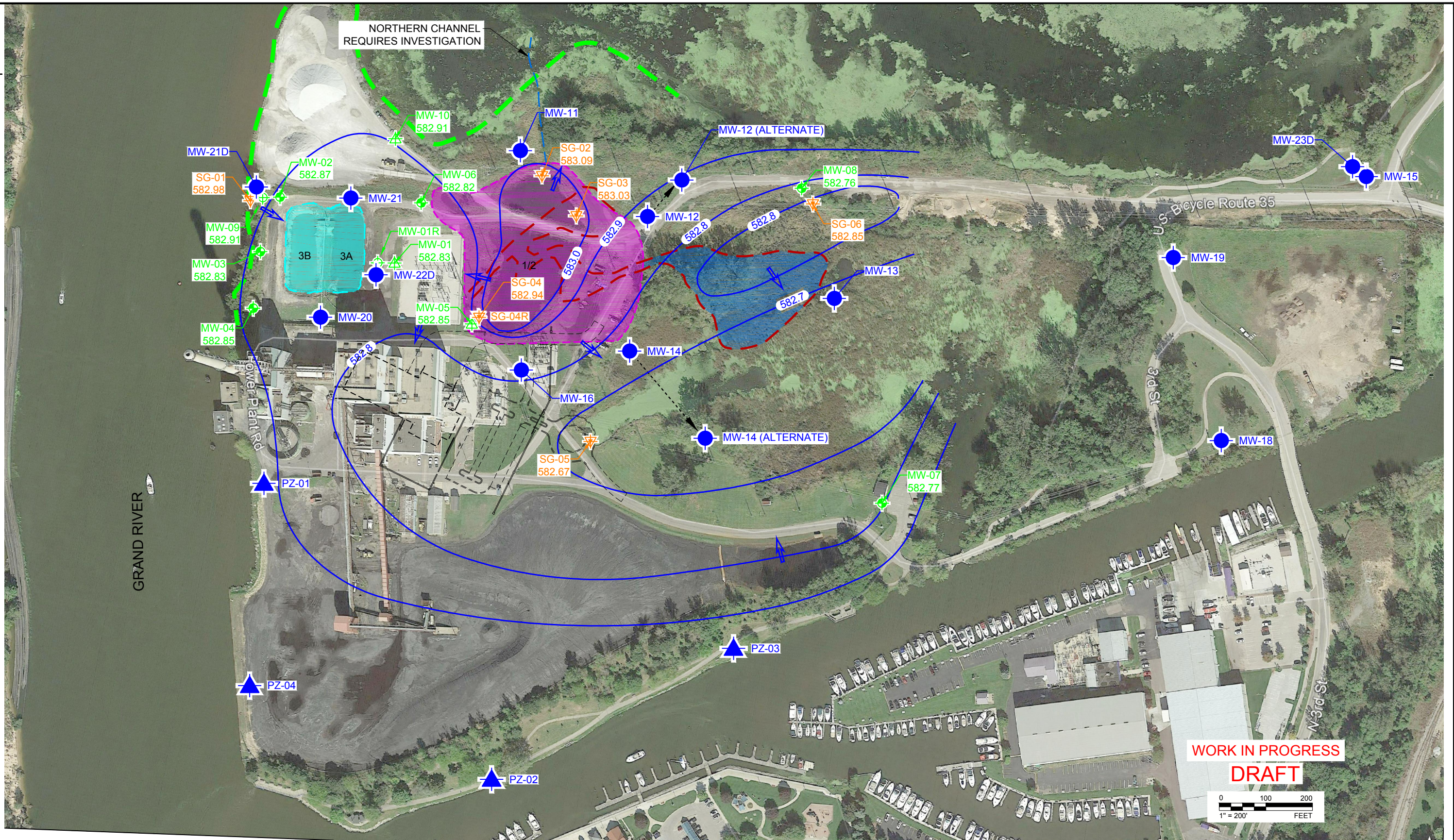
CC: Art Siegal - Jaffe Raitt Heuer & Weiss, P.C.
Dave Walters - GHBLP
Erik Booth, P.E. - GHBLP
Paul Cederquist - GHBLP

Attachments: DRAFT-WORK-IN-PROGRESS Monitoring Well Network Figure
Copy of the February 3, 2021 Response Letter from MMD to GHBLP

ATTACHMENT 1

DRAFT-WORK-IN-PROGRESS
Monitoring Well Network Figure

Path: \\golder-gb.com\projects\JB Sims\2014\048\002\Drawings\2014\048\002.dwg | File Name: 2014\048\002.dwg | Last Edited By: dcos Date: 2021-02-02 Time: 2:23:36 PM



REFERENCE
AERIAL PHOTOGRAPH COURTESY OF GOOGLE EARTH PRO; IMAGE DATE: 2018-09-22.

NOTE(S)
1. HORIZONTAL COORDINATE SYSTEM BASED ON MICHIGAN STATE PLANE SOUTH, INTERNATIONAL FEET. VERTICAL DATUM IS NAVD 1988.

LEGEND

- PROPOSED MONITORING WELL
- PROPOSED PIEZOMETER
- DETECTION MONITORING WELL
- ASSESSMENT MONITORING WELL
- PIEZOMETER
- STAFF GAUGE

- 582 — GROUNDWATER CONTOURS (JUNE 17, 2020)
- LIMIT OF UNITS 1/2 ASH PLACEMENT ~1974-2012
- UNIT 3 FORMER LIMITS OF ASH PLACEMENT
- MIXING ZONE
- APPROXIMATE LIMIT OF UNITS OF 1/2 ASH DISPOSAL PRIOR TO 1974
- GROUNDWATER FLOW DIRECTION

CLIENT
GRAND HAVEN BOARD OF LIGHT AND POWER
GRAND HAVEN, MICHIGAN

CONSULTANT



YYYY-MM-DD	2021-02-09
DESIGNED	DLP
PREPARED	DJC
REVIEWED	
APPROVED	

PROJECT
JB SIMS GENERATING STATION
ANNUAL REPORT

TITLE
**SITE PLAN AND PROPOSED MONITORING WELL
AND PIEZOMETER LOCATION MAP**

PROJECT NO. 20141048
CONTROL 20141048H002.dwg

REV. 0

FIGURE 1

1 in IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

ATTACHMENT 2

Copy of February 3, 2021
Response Letter from MMD to
GHBLP



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 3, 2021

VIA EMAIL & U.S. MAIL

Mr. Erik Booth
Grand Haven Board of Light and Power
1700 Eaton Drive
Grand Haven, MI 49417

Dear Mr. Booth:

The Department of Environment, Great Lakes, and Energy (EGLE) is in receipt of Grand Haven Board of Light and Power's (GHBLP) December 16, 2020 letter entitled, "JB Sims Power Plant Site Closure" and GHBLP December 30, 2020 letter, "Response to EGLE comments: JB sims request for mixing zone authorization". In these letters, GHBLP defends its request for a mixing zone authorization for Unit 1/2.

GHBLP's request for a mixing zone authorization is still premature. The mixing zone authorization request for Unit 1/2 relies upon GHBLP's Alternate Source Demonstration submitted on December 28, 2020 for Unit 3A/3B, which was denied on January 28, 2021. Furthermore, GHBLP informed EGLE in its December 30, 2020 letter that GHBLP no longer intended to use a multi-unit network monitoring system. However, the adequacy of these separate monitoring networks has not been demonstrated for either Unit 1/2 or Unit 3A/3B. An adequate monitoring network and following the steps outlined in R. 299.4309 for Unit 1/2 and Sec. 11519b(2) and Sec. 11519b(4) for Unit 3A/3B are necessary for review of a mixing zone authorization. If GHBLP wishes to seek a mixing zone authorization request in the future, the request, if approvable, should be made as part of a remedial action plan.

Additionally, GHBLPs December 16, 2020 and December 30, 2020 letters suggest that Unit 1/2 is not regulated under Part 115 law. EGLE will refer GHBLP to the Michigan Department of Attorney General's response to this claim as provided on December 23, 2020 and attached with this response.

This letter details the state law requirements under Part 115 with which GHBLP must comply for Unit 1/2 and 3A/3B. Compliance with state law does not obviate the obligation that GHBLP comply with federal law, including the United States Environmental Protection Agency's coal combustion residuals program and its closure requirements.

Mr. Erik Booth
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If GHBLP would like to discuss any of the above information, please contact Kent Walters by email at waltersk7@michigan.gov or by telephone at 616-278-4350

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Walters', with a stylized flourish at the end.

Kent A. Walters, Geologist
Materials Management Division
Grand Rapids District Office
Department of Environment, Great Lakes
and Energy

Enclosure

cc: Ms. Tiffany Johnson, Golder
Ms. Margie Ring, EGLE
Ms. Alexandra Clark, EGLE
Mr. Fred Sellers, EGLE
Mr. Timothy Unseld, EGLE
Mr. David Willard, EGLE