

October 2, 2020

Project No. 20143787

**Bradley Runkel, P.E.**

Consumers Energy Company  
1945 W. Parnall Road  
Jackson, Michigan 49201

**D.E. KARN - BOTTOM ASH POND CCR REMOVAL AND DECOMMISSIONING NOTIFICATION**

Dear Mr. Runkel,


Golder Associates Inc, (Golder) has prepared this letter as notification that the Consumers Energy Company (CEC) D.E. Karn Generating Facility (DEK) Bottom Ash Pond Coal Combustion Residual Unit (CCR Unit) is no longer subject to Title 40 of the code of Federal Regulations Section 257.83 (40 CFR Part 257.83).

In April 2015, the United States Environmental Protection Agency (EPA) issued the Coal Combustion Residual (CCR) Resource Conservation and Recovery Act (RCRA) Rule (40 CFR 257 Subpart D) ("CCR RCRA Rule"). The CCR RCRA Rule requires owners or operators of existing CCR surface impoundments to have those units inspected on an annual basis by a qualified professional engineer (QPE) in accordance with 40 CFR 257.83.

CEC provided notice of the intent to initiate closure of the DEK Bottom Ash Pond CCR Unit on October 12, 2018. CCR was removed from the Bottom Ash Pond and documented in the report titled "D.E. Karn Generating Facility, Bottom Ash Pond CCR Removal Documentation Report" prepared by Golder, dated October 25, 2019. The CCR removal was performed in general accordance with DEK's approved closure plan titled "D.E. Karn Generating Facility, Bottom Ash Pond Closure Work Plan" dated, November 29, 2017, and "Karn Bottom Ash Pond CCR Test Procedure Update" dated, June 5, 2019. Following CCR removal, the Bottom Ash Pond footprint and surrounding berms were regraded and vegetated to maintain positive site drainage and control erosion, respectively. As a result, the Bottom Ash Pond is no longer a CCR surface impoundment by virtue it can no longer impound CCR and/or water and therefore an annual inspection per 40 CFR Part 257.83 is no longer required.

Sincerely,

**Golder Associates Inc.**



Halle Doering, E.I.T.  
*Project Engineer*



Tiffany D. Johnson, P.E.  
*Principal*

[https://golderassociates.sharepoint.com/sites/127083/project files/6 deliverables/pond closure letters/finals/dek bottom ash pond removal letter - final.docx](https://golderassociates.sharepoint.com/sites/127083/project%20files/6%20deliverables/pond%20closure%20letters/finals/dek%20bottom%20ash%20pond%20removal%20letter%20final.docx)