

July 21, 2023

TRANSMITTAL VIA EMAIL 07/21/2023

Mr. John Ozoga
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Bay City Office
401 Ketchum St, Suite B
Bay City, Michigan 48708

**NOTIFICATION OF INTENT TO INITIATE CLOSURE FOR DE KARN LINED COAL ASH IMPOUNDMENT;
SOLID WASTE DISPOSAL AREA OPERATING LICENSE NO. 9629; WASTE DATA SYSTEM NUMBER 392503**

Dear Mr. Ozoga,

Consumers Energy (CEC) is providing this notification of intent to initiate closure for the DE Karn Lined Coal Ash Impoundment (Lined Impoundment) in accordance with § 257.102(g). Closure by Removal pursuant to § 257.102(c) is detailed in the Closure Plan (Golder Associates, June 2018). Federal CCR rule requirements are self-implementing and need to be coordinated with state requirements. Therefore, a Closure Work Plan (WSP, June 2023) was submitted to EGLE which provides additional details for excavation and confirmation that coal ash has been removed.

CEC is commencing with closure activities as defined in § 257.102(e)(3)(iii) by taking steps any steps necessary to comply with any state or other agency standards that are a prerequisite, or are otherwise applicable, to initiating or completing the closure. Additionally, a final engineering certification is not included with this notification since a final cover system required by § 257.102(d)(3)(iii) is not applicable. CEC is forecasting this work can be accomplished within the five-year timeframe provided in § 257.102(f)(1)(ii).

Please feel free to contact me with any questions or clarifications regarding this submittal.

Sincerely,



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Risk Management
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cc: Ms. Lori Babcock, EGLE Bay City District Office
Mr. Mike Quigg, EGLE Bay City District Office
Mr. Jim Arduin, EGLE Materials Management Division, Lansing
Ms. Margie Ring, EGLE Materials Management Division, Lansing
Mr. Joe Firlit, Consumers Energy
Ms. Erin Busby, Consumers Energy
Mr. John Puls, WSP
Ms. Darby Litz, TRC

References:

(Golder Associates, June 2018). "*D.E. Karn Generating Facility, Karn Lined Impoundment Closure Plan, Essexville, Michigan, Pursuant to 257.102.*" (Closure Plan).

(WSP, June 2023) "*Closure Work Plan, D.E. Karn Generating Facility Karn Lined Impoundment*" (Closure Work Plan).