



October 10, 2019

Project No. 19123156

**Bradley Runkel, P.E.**

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

## **J.H. CAMPBELL - BOTTOM ASH PONDS 3 N/S CCR REMOVAL AND DECOMMISSIONING NOTIFICATION**

Dear Mr. Runkel,

Golder Associates Inc, (Golder) has prepared this letter as notification that the J.H. Campbell Generating Facility (JHC) Bottom Ash Ponds 3 North and 3 South (3 N/S) Coal Combustion Residuals Units (CCR Units) are 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 initiated closure of the JHC Bottom Ash Ponds 3 N/S CCR Units on April 5, 2017. CCR was removed from the Bottom Ash Pond 3 N/S and documented in the report titled "J.H. Campbell Generating Facility, Bottom Ash Ponds 3 N/S CCR Removal Documentation Report" prepared by Golder, dated June 27, 2019. The CCR removal was performed in general accordance with JHC's approved closure plan titled "J.H. Campbell Generating Facility, Bottom Ash Ponds 3 N/S Closure Work Plan (Rev.1)" dated, January 27, 2017. Following CCR removal, the Ponds 3 N/S footprint and surrounding berms were regraded and vegetated to maintain positive site drainage and control erosion, respectively. As a result, Bottom Ash Pond 3 N/S 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.**

Jeffrey R. Piaskowski, P.E.  
*Senior Project Engineer*

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

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**Golder Associates Inc.**  
15851 South US 27, Suite 50 Lansing, Michigan, USA 48906

T: +1 517 482-2262 +1 517 482-2460