



J.H. Campbell Generating Facility

Dry Ash Landfill Cell 6 Expansion - Construction Certification

Pursuant to:

40 CFR 257.70(f)

Submitted to:

Consumers Energy Company

1945 Parnall Road
Jackson, Michigan, USA 49201

Submitted by:

Golder Associates Inc.

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Project No. 21451121

October 2022

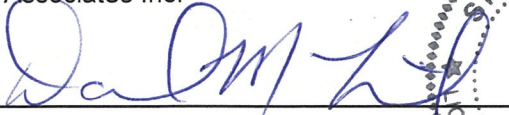


CERTIFICATION

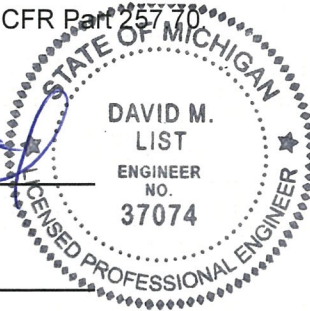
Professional Engineer Certification Statement [40 CFR 257.70(f)]

I hereby certify that, having reviewed the attached documentation and being familiar with the provisions of Title 40 of the Code of Federal Regulations Section 257.70, this construction certification document is accurate and has been prepared in accordance with good engineering practices, including the consideration of applicable industry standards and with the requirements of 40 CFR Part 257.70.

Golder Associates Inc.



Signature

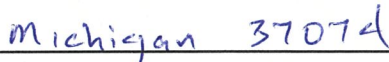


October 14, 2022

Date of Report Certification

David M. List

Name



Professional Engineer Certification Number

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1.0 INTRODUCTION

On April 17, 2015, the United States Environmental Protection Agency (USEPA) issued the Coal Combustion Residual (CCR) Resource Conservation and Recovery Act (RCRA) Rule (40 CFR 257 Subpart D) (“CCR RCRA Rule”) to regulate the solid waste management of CCR generated at electric utilities. Section 257.70(f) of the CCR RCRA Rule requires the owner or operator, upon construction of any CCR landfill or CCR landfill expansion, to obtain certification from a qualified professional engineer that the composite liner or alternative composite liner (if applicable) and leachate collection/removal system have been constructed in accordance with the requirements of 40 CFR 257.70.

2.0 CONSTRUCTION CERTIFICATION [40 CFR 257.70(f)]

The Consumers Energy Company (CEC) J.H. Campbell Generating Facility (JH Campbell) Dry Ash Landfill Cell 6 Expansion was completed in accordance with Approved for Construction design/contract drawings that were prepared to comply with 40 CFR 257.70 – Design criteria for new CCR landfills and any lateral expansion of a CCR landfill. A certification of the design was prepared by Golder Associates Inc. (Golder) on June 18, 2021.

Golder prepared the J.H. Campbell Ash Storage Landfill Cell 6 Construction Documentation Report (Documentation Report) after conducting full-time onsite construction quality assurance (CQA) services during the CCR landfill expansion. The Documentation Report was submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on January 27, 2022. EGLE approved the Documentation Report on October 12, 2022 and Cell 6 was authorized to receive waste as per the site’s Operating License Number 9682, dated October 12, 2022.

Golder is submitting this document to certify that the CEC JH Campbell Dry Ash Landfill Cell 6 Expansion was constructed in accordance with 40 CFR 257.70. Prior to the initial receipt of CCR in the Cell 6 Expansion, this certification must be placed in the facility’s operating record in accordance with Section 257.105(f) and must be made available on the facility’s publicly accessible internet site in accordance with Section 257.107(f).

3.0 CONCLUSION AND SUMMARY

Golder is certifying that the JH Campbell Dry Ash Landfill Cell 6 Expansion was constructed in accordance with 40 CFR 257.70. Prior to the initial receipt of CCR in the Cell 6 Expansion, this certification must be placed in the facility’s operating record in accordance with Section 257.105(f) and must be made available on the facility’s publicly accessible internet site in accordance with Section 257.107(f).

Sincerely,

Golder Associates Inc.



Aaron C. Bickel
Project Engineer



David M. List, PE
Principal, Senior Consultant

4.0 REFERENCES

Golder Associates Inc. January 2022. J.H. Campbell Dry Ash Landfill - Cell 6 Construction Documentation Report.

Golder Associates Inc. June 2021. J.H. Campbell Generating Facility, Dry Ash Landfill Cell 6 Expansion – Documentation of Design Criteria for Landfill Expansion, Pursuant to 40 CFR 257.70.

United States Environmental Protection Agency (USEPA). July 2018. Code of Federal Record Title 40 Part 257 Subpart D, as amended.



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