

TECHNICAL MEMORANDUM**DATE** April 10, 2019**Project No.** 1896102**TO** Consumers Energy Company**FROM** Jeff Piaskowski, PE**EMAIL** jpiaskowski@golder.com**CC** Matt Wachholz, PE; Megan Jehring, EIT; Halle Doering, EIT**CONSUMERS ENERGY COMPANY J.H. CAMPBELL GENERATING FACILITY
BOTTOM ASH PONDS 1-2 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT****1.0 HAZARD POTENTIAL CLASSIFICATION**

On April 17, 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") to regulate the solid waste management of CCR generated at electric utilities. Section 257.73(a)(2) of the CCR RCRA Rule requires the owner or operator of an existing CCR surface impoundment to document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment.

Hazard potential classification is defined as the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances. The hazard potential classifications include the following which are further defined as:

- High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
- Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

According to Section 257.73(a)(2)(ii), the hazard classification potential assessment must be certified by a qualified professional engineer (QPE) stating that the initial hazard potential classification and each subsequent periodic classification were conducted in accordance with the requirements of 40 CFR 257.73. Golder certified Bottom Ash Ponds 1-2 (Ponds 1-2) as a significant hazard potential CCR surface impoundment on October 14, 2016. Periodic hazard potential classifications must be made at least every five years in accordance with 40 CFR 257.73(f)(3). 40 CFR Part 257.73(a)(3)(iii) states that, if a CCR unit is no longer classified as either a high or significant hazard potential, then the owner/operator is no longer required to prepare and maintain a written

Emergency Action Plan (EAP) beginning on the date the periodic hazard potential assessment documentation is placed in the facility's operating record as required by 40 CFR Part 257.105(f)(5).

Golder Associates Inc. (Golder) is submitting this Hazard Potential Classification Assessment Memorandum (Memo) to certify a low hazard potential classification applies to Ponds 1-2 at the Consumers Energy Company (CEC) J.H. Campbell Generating Facility (JH Campbell) near West Olive, Michigan per 40 CFR Part 257.73(a)(2).

2.0 POND 1-2 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Ponds 1-2 was decommissioned in 2018, when the inflow was rerouted, the unit was dewatered, and CCR was removed in accordance with 40 CFR 257.102(c). CEC posted its notification of intent to initiate closure dated September 7, 2018 on its public website in accordance with 40 CFR 257.102(g). After CCR removal, the Ponds 1-2 area was regraded and seeded to promote drainage and establish vegetation, respectively. As a result, Ponds 1-2 is no longer capable of impounding water, and is classified as a low hazard potential CCR surface impoundment. Per 40 CFR 257.73(a)(3)(iii), CEC is no longer required to prepare and maintain a written EAP beginning on the date this memorandum is placed in the facility's operating record as required by 40 CFR 257.105(f)(5).

3.0 REFERENCES

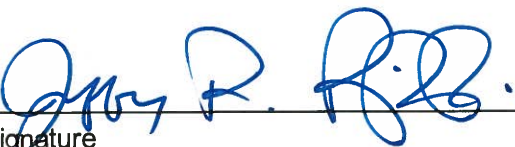
USEPA (Environmental Protection Agency). 2015. Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule. 40 CFR Part 257. Effective Date October 19, 2015.

CERTIFICATION

Professional Engineer Certification Statement [40 CFR 257.73]

I hereby certify that, having reviewed the attached documentation and being familiar with the provisions of Title 40 of the Code of Federal Regulations Sections 257.73 (40 CFR Part 257.73), I attest that this hazard potential classification memorandum 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 257.73.

Golder Associates Inc.



Signature

April 10, 2019

Date of Report Certification

Jeffrey R. Piaskowski, P.E.

Name

6201061033

Professional Engineer Certification Number

