



A CMS Energy Company

Date: May 2, 2018

To: Operating Record


From: Beth Swanberg

RE: Initiation of Assessment Monitoring Program under §257.94(e)(3)

Consumers Energy reported in the January 31, 2018 Annual Groundwater Monitoring and Corrective Action Report for the JH Campbell Power Plant Pond A Coal Combustion Residual (CCR) Unit in West Olive, Michigan, that boron and sulfate were observed in at least one downgradient monitoring well above background. TRC performed an Alternate Source Demonstration for the parameters and did not find strong enough evidence within 90 days to determine that there was another source for the observation of constituents above background.

Therefore, Consumers Energy will commence an Assessment Monitoring Program for the JH Campbell Power Plant Pond A CCR Unit pursuant to 40 CFR 257.95 that will sample and analyze the groundwater monitoring system for all constituents listed in Appendix IV. The results from this initial assessment monitoring sampling event will be used to establish a groundwater protection standard for each constituent. If one or more constituents in Appendix IV are detected at statistically significant levels above the groundwater protection standard, CEC will characterize the nature and extent of any release(s) that will inform remedy selection.

This notice satisfies recordkeeping requirement §257.105(h)(5) by placing this notice in the operating record.

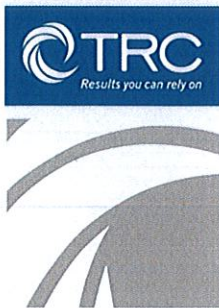
  
\_\_\_\_\_  
Signature

May 2, 2018  
\_\_\_\_\_  
Date of Certification

Bethany Swanberg  
\_\_\_\_\_  
Name

**ENCLOSURES**

TRC's April 2018 letter: "*Evaluation of Alternative Sources per CCR Rule §257.94 (e)(2), Pond A CCR Unit, JH Campbell Power Plant, West Olive, Michigan.*"



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April 13, 2018

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

Subject: Evaluation of Alternative Sources per CCR Rule §257.94 (e)(2)  
Pond A CCR Unit  
JH Campbell Power Plant, West Olive, Michigan

Dear Ms. Swanberg:

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published Title 40 Code of Federal Regulation (40 CFR) Part 257, Subpart D, the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule). The CCR Rule, which became effective on October 19, 2015, applies to the Consumers Energy Company (CEC) JH Campbell Power Plant Pond A CCR unit for the development of a groundwater monitoring system and implementation of a groundwater monitoring program detailed in §257.90 through §257.98. CEC initiated a groundwater detection monitoring program in accordance with the CCR Rule, and completed an initial detection monitoring event during the 4<sup>th</sup> quarter of 2017. Data from this event were reviewed to determine if there was a statistically significant increase (SSI) over background. Data showed that there was at least one SSI observed in the detection monitoring data as summarized in the Annual Groundwater Monitoring Report, JH Campbell Power Plant Pond A CCR Unit, West Olive, Michigan (TRC, January 2018).

Pursuant to §257.94 (e) of the CCR Rule, if the owner or operator of the CCR unit determines, pursuant to §257.93 (h), that there is a SSI over background levels for one or more of the constituents listed in Appendix III to this part at any monitoring well at the waste boundary specified under §257.91(a)(2), the owner operator may demonstrate that a source other than the CCR unit (an alternative source demonstration (ASD)) caused the SSI over background levels for one or more of the constituents listed in Appendix III (§257.94 (e)(2)). The owner or operator must complete the ASD within 90-days of detecting an SSI over background levels, which includes obtaining a certification from a qualified professional engineer verifying the accuracy of the information in the ASD report.

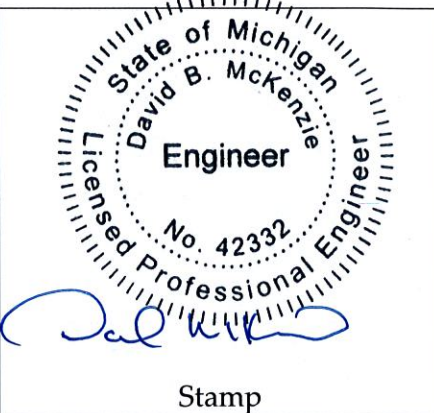
TRC performed an alternate source evaluation for the Pond A CCR unit. Our review of the data concluded that insufficient lines of evidence exist to demonstrate that a source other than the Pond A

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CCR unit caused the SSI(s) in the initial detection monitoring event. The potential applicability of an ASD will continue to be evaluated as CCR unit monitoring continues and additional data are collected. Based on these findings, we understand that it is CEC's intent to initiate assessment monitoring pursuant to §257.95(b), and will update the operating record to reflect that the Pond A CCR unit has entered assessment monitoring, send a notice to the State Director and post the notice to the CCR Compliance Public Website of the same.

**Professional Engineer Certification Statement [40 CFR Part 257.94 (e) (2)]**

I hereby certify that, having reviewed the preliminary ASD and being familiar with the provisions of 40 CFR §257.94 (e)(2), I attest that the ASD was prepared for the JH Campbell Power Plant Pond A CCR unit in accordance with the requirements of 40 CFR 257.94 (e)(2).

Name: David B. McKenzie, P.E.	Expiration Date: October 31, 2019	
Company: TRC Engineers Michigan, Inc.	Date: April 13, 2018	

