

## JRW Emergency Action Plan Face-to-Face Meetings Record

### Whiting 2019:

On March 27, 2019, Consumers Energy personnel met with Monroe County Management (coordinates first responders) and the Michigan Department of Environmental Quality in Monroe, MI to review the Emergency Action Plan for Ponds 1&2 at Consumers Energy's JR Whiting site.

Since closing JR Whiting, Consumers Energy has divested the generating plant, but has retained the ash ponds. Ponds 3-6 have been closed and Pond 1&2 is scheduled for closure in 2019. Even though there are no loss of life concerns, there is the potential for ash to be released from Pond 1&2 to the environment if there were to be catastrophic failure of the dikes, so an EAP is required by the Coal Combustion Residuals (CCR) rules in the Resource Conservation and Recovery Act (RCRA) located in 40 CFR 257. The purpose of the EAP is to define emergencies related to CCR surface impoundments, define responsible persons, and define notification procedures in the event of an emergency. We further reviewed the low likelihood of such a failure, the key features and hydraulic connections, that safety emergency response protocol would be initiated if the subject CCR unit failed or if failure were imminent, the failure scenarios in the EAP, and the response approach identified in Figure 5 of the EAP. We also discussed that if 911 is called, 911 will call the first available response unit because public safety is the first priority and that the fire department notifies the National Response Center (NRC). The critical notifications in an event are: 911, sheriff, county board of commissioner's chairman, and emergency management on-call.

We also discussed that since last year's meeting, Consumers Energy has placed "Ash Danger Engulfment Hazard" signs to discourage first responders and others from entering the ponds and updated Figure 5 of the EAP. Additionally, we discussed that beginning in April, Pond 1&2 will actively be dewatered and in closure. During closure, there will be full-time personnel on site during the dewatering and reconstruction of the pond that can quickly respond to and address any emergencies. Tom Shields is the Project Manager for that project.

There was good discussion amongst all in attendance and action items included:

1. Revise Figure 5 as follows:
  - a. The DEK Plant Control Room Operator number needs to be revised to: 989-891-3101
  - b. Change "DEK On Call Shift Supervisor" to "JRW CCR Lead"
  - c. Under the Emergency Responder Notifications section add "2. Nonemergency Dispatch 734-243-7070" (this number is used to update 911 on the status of the issues)
  - d. Add the following number to 4. MDEQ Jackson District Office: 517-780-7690 (Note, "DEQ" will now be "EGLE", the Department of Environment, Great Lakes, and Energy.)
  - e. Under Section 12, change "DEK Environmental Lead" to "JRW CCR Lead"

It was also noted that the EAP had not been activated by March 27, 2019.

As mentioned, Pond 1&2 should be closed this fall, at which time, the EAP is no longer required, so we do not anticipate another meeting.

### Whiting 2018:

On March 27, 2018, Consumers Energy personnel met with Monroe County Management (coordinates first responders) and the US EPA Federal On-Scene Coordinator to review the Emergency Action Plan for Pond 1&2 at Consumers Energy's JR Whiting site. After good discussion amongst everyone in attendance the following action items were generated and completed:

1. Revise Figure 5 as follows:
  - a. Change MDEQ SE Michigan District Office to the Jackson District Office
  - b. Change the name of the Monroe County Alert Notification System to the Emergency Management Division
  - c. Add the Coast Guard (out of Toledo) to the list of Emergency Responder Notifications
  - d. Add the drinking water plant (out of Toledo) to the list of Emergency Responder Notifications
2. Install a sign by the Ponds 1&2 to provide the number for Consumers Energy's Security Command and to warn that ash ponds may be unsafe to walk/drive in

It was also noted that the EAP had not been activated by March 27, 2018.

All changes to the EAPs have been made and the signs have been installed at JR Whiting 1&2.

### JR Whiting Pond 1&2

On 9/19/18, three "Ash Pond Danger Engulfment Hazard" signs were installed by Ryan Central on the entrance gate, NE, and SE areas of JRW Ponds 1&2. This was determined to be a good preventative step (not a requirement) at the Emergency Action Plan meeting. Because ash does not act like soil, but could be assumed to act like soil, there are potential hazards that would be unknown to first responders or anyone else without ash handling experience if they were to attempt to work in the ponds. The signs also have a phone number (Consumers Energy's Security Command) that individuals can call in case of an emergency.

