



October 2, 2020

Project No. 20143787

Bradley Runkel, P.E.

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

J.R. WHITING - PONDS 1 AND 2 CCR CLOSURE

Dear Mr. Runkel,

Golder Associates Inc, (Golder) has prepared this letter as notification that the Consumers Energy Company (CEC) J.R. Whiting Generating Facility (JRW) Ponds 1 and 2 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 provided notice of the intent to initiate closure of Ponds 1 and 2 CCR Units on November 14, 2017. CCR was placed to design grade and the pond was closed with an engineering cap and documented in the report titled "J.R. Whiting Generating Facility, Ponds 1 and 2 – Construction Documentation Report" prepared by Golder, dated February 24, 2020. A "Notification of Closure of JR Whiting Ponds 1 and 2", dated March 20, 2020 was placed on CEC's public website on March 20, 2020. The closure was performed in general accordance with JRW's approved closure plan titled "J.R. Whiting Generating Facility, Ponds 1-2 Closure Plan" dated December 18, 2017. Ponds 0-8 are no longer a CCR surface impoundment and therefore no longer subject to an annual inspection per 40 CFR Part 257.83.

Sincerely,

Golder Associates Inc.

A handwritten signature in black ink that reads 'Halle Doering'.

Halle Doering, E.I.T.
Project Engineer

A handwritten signature in blue ink that reads 'Tiffany D. Johnson'.

Tiffany D. Johnson, P.E.
Principal

[https://golderassociates.sharepoint.com/sites/127083/project files/6 deliverables/pond closure letters/finals/jrw ponds 1-2 closure letter - final.docx](https://golderassociates.sharepoint.com/sites/127083/project%20files/6%20deliverables/pond%20closure%20letters/finals/jrw%20ponds%201-2%20closure%20letter%20-%20final.docx)

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