

A CMS Energy Company

Date: November 30, 2018

To: J.R. Whiting Ash Pond Operating Record

From: Joy R. Hwang, Environmental Services Department

RE: Annual Coal Combustion Residual (CCR) Fugitive Dust Control Report
J.R. Whiting Generating Plant

Introduction

This report serves as the Annual CCR Fugitive Dust Control Report required by the United States Environmental Protection Agency (EPA), CCR Resource Conservation and Recovery Act (RCRA) Rule. It describes the actions taken at Consumers Energy Company's (CE) J.R. Whiting (JRW) facility ash ponds 1&2 to minimize fugitive dust from CCR units. The CCR units are located adjacent to the former JRW facility, located at 4525 Erie Road, Erie, Michigan; the facility was a coal-fired electric generating power plant that ceased operation in April of 2016. Ownership of the plant site proper was transferred from Consumers Energy (CE) on October 19, 2017; however, Consumers Energy retained ownership of the ash ponds. This annual report has been developed and placed into the facility operating record in accordance with the CCR regulations stipulated in 40 CFR 257.80 and 40 CFR 257.105(g), as well as posted to the public website within 30 days in accordance with 40 CFR 257.107(d). This report is required to include a description of the actions taken by company personnel or contractors to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective actions taken.

Fugitive Dust Control Activities

The J.R. Whiting plant ceased electric generation activities on or about April 12, 2016. As previously stated, the former electric generation plant was divested on October 19, 2017 and is no longer owned by Consumers Energy. The CCR regulation is now only applicable to Ash Ponds 1&2 and corresponding roadways.

Ash Ponds 1&2 remain in a wet and/or vegetative condition that minimizes fugitive dust generation. Closure activities for these units will commence in the spring of 2019. Construction activities are suspended if there is excessive dusting or when there are sustained wind speeds of over 20 mph. Surrounding roadways are well maintained and rarely traveled (for routine inspections) and the 15 mph speed limit is observed.

Citizen Complaints

There were no citizen complaints of CCR fugitive dust received for former JRW facility for the time period December 1, 2017, through November 30, 2018; therefore no corrective actions were warranted in response.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a regular basis in accordance with the Fugitive Dust Control Plan (FDCP). Corrective as well as preventative measures are properly implemented as warranted, including limiting vehicle speed and spraying water for fugitive dust control. There were no specific corrective actions required over the course of the last year.

Conclusion

An assessment of the FDCP was conducted on November 9, 2018. Applicable aspects of the plan were found to be correctly implemented with no findings to report. During the site visit, the FDCP was reviewed and is subsequently being amended to reflect closure activities pursuant to 40 CFR 257.80(b)6. The amended plan will be signed by a professional engineer as required by 40 CFR 257.80(b)7 and will shortly be posted to the operating record as required by 40 CFR 257.105(g).