



Protecting, Enhancing, and Restoring Our Environment

December 5, 2017

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

**Re: Closure Certification  
Consumers Energy's JR Whiting Plant Pond 6 Closure  
Erie, Michigan  
CTI Project No. 2168070034**

Dear Ms. Marion,

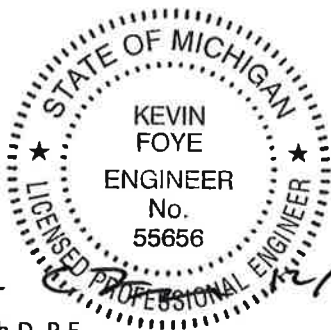
I hereby certify that, having reviewed the observations, reports, documents, and photos collected by CTI personnel during the construction of the Pond 6 cover system at the JR Whiting Plant and being familiar with the provisions of Title 40 of the Code of Federal Regulations Sections 257.100 and 257.102 (40 CFR 257.100, 40 CFR 257.102), I attest that the closure of inactive surface impoundment Pond 6 has been completed in accordance with the closure plan required by 40 CFR 257.100(e)(6)(i) and 40 CFR 257.102(b) and in accordance with the requirements of 40 CFR 257.102 as follows.

In accordance with the closure plan (*Closure Plan: Pond 6, JR Whiting Plant, Erie, Michigan*, prepared by Mannik Smith Group and dated November 20, 2017) and 40 CFR 257.102(d)(3), the Pond 6 final cover system was constructed with the following components (from top to bottom):

- 6 inches thick erosion layer (topsoil) consisting of seeded, fertilized, and mulched earthen material to minimize erosion potential,
- 24 inches thick infiltration layer (protection layer),
- 40-mil textured high-density polyethylene (HDPE) geomembrane (to minimize infiltration and resist the effects of subsidence in conjunction with the 24-inch infiltration layer),
- 10-oz/sy nonwoven geotextile (to protect the geomembrane at the subgrade interface), and
- Compacted fly ash subgrade (to minimize subsidence potential).

I certify that the field observations, reports, and documents used as a basis for this certification were prepared under my supervision in conformance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiries of the persons who were directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete.

Sincerely,



Kevin Foye, Ph.D. P.E.  
CTI Certifying Engineer  
Michigan Professional Engineer No. 55656