

JH Campbell/BC Cobb Emergency Action Plan Annual Face-to-Face Meeting Record

Cobb 2019 Annual Meeting:

On April 12, 2019, the Michigan Department of Environmental Quality, Muskegon County Emergency Management, North Muskegon Fire Chief, North Muskegon (Police) Chief, the Muskegon County Environmental Health Director and Consumers Energy met in Muskegon, MI to review the Emergency Action Plan (EAP) for Ponds 0-8 and the Bottom Ash Pond of Consumers Energy's BC Cobb site.

Since closing the BC Cobb plant, Consumers Energy has divested the generating plant, but has retained the ash ponds. Ponds 0-8 and the Bottom Ash Pond have ceased operation and are partially drained. Consumers Energy is planning to close them by removing the ash beginning in 2020. Even though there are no loss of life concerns, there is the potential for ash to be released to the environment from these ponds if there were a 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. Additional review items included 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.

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

1. Consumers Energy was requested to consider:
 - a. Mimicking the Alerting Levels (Condition A-D) already in place for its hydroelectric dams (this has since been determined to be not applicable)
 - b. Involving its Public Safety Outreach Officers that Emergency Management personnel are already familiar with
 - c. Calling 911 and requesting that this process is mapped in the 911 system/CAD systems so 911 knows who to call. 911 will also notify the city and county if we ask them to.
2. Revise EAP Figure 5 as discussed, though that it may change based on the involvement of Consumers Energy's Public Safety Outreach Officers

It was also noted that the EAP had not been activated by April 12, 2019.

Campbell and Cobb 2018:

On April 12, 2018, Consumers Energy personnel met with the Michigan Department of Environmental Quality, Ottawa County Emergency Management, and the Ottawa County Sheriff to review the Emergency Action Plan (EAP) for Consumers Energy's JH Campbell Facility and B.C. Cobb Facility. After good discussion amongst everyone in attendance the following action items were generated and completed:

1. Revise Figure 5a and 5b in the JH Campbell EAP.
2. Revise Figure 4 in the BC Cobb EAP.
3. Install a sign at BC Cobb 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 April 12, 2018.

All changes to the EAPs have been made and the signs have been installed at BC Cobb.

Cobb Ponds 0-8 and BA Pond

On 12/7/18, the “Ash Pond Danger Engulfment Hazard” sign was installed by FKE Engineering on the entrance to the Cobb BA Pond and Ponds 0-8. 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.

