

# Memo

Date: Wednesday, July 27, 2022

To: Muskegon Environmental Redevelopment Group, LLC

From: HDR Michigan, Inc.

Subject: Former BC Cobb Power Plant CCR Surface Impoundments  
Semiannual Update for Selection of Remedy per §257.97(a)

The former BC Cobb Power Plant (BCC or Site) is the site of a former coal-fired power generation facility located in Muskegon, Michigan. During operations, coal combustion residuals (CCR) were deposited in Ponds 0-8 and the Bottom Ash Pond (Ponds). In accordance with the U.S. Environmental Protection Agency's (EPA's) Coal Combustion Residuals (CCR) Rule specified in 40 CFR §257, Consumers Energy Company (CEC) installed a groundwater monitoring network around the CCR surface impoundments in 2015. In January 2019, CEC reported that concentrations of Appendix IV constituents in monitoring wells at the surface impoundments were observed at statistically significant levels (SSLs) above Groundwater Protection Standards (GPS) (CEC, 2019). Subsequently, the Assessment of Corrective Measures (ACM) Report was completed on September 11, 2019 and posted to CEC's public website (TRC, 2019). This Semiannual Progress Report, prepared as a requirement of 40 CFR §257.97(a) of the CCR Rule, describes progress toward selecting a remedy for corrective measures at the former BCC.

The Muskegon Environmental Redevelopment Group, LLC (MERG) acquired the BCC Ponds in 2020 and recently completed removal of CCR from the ponds as part of pond remediation and closure efforts in April 2022. MERG has continued implementation of the federal CCR Rule groundwater monitoring program, as required by §257.90-95, as a continuation of the CEC monitoring program.

## Source Control Progress

A Closure Plan and Notification of Intent to Initiate Closure by removal provision in §257.102(c) was placed in CEC's operating record on March 30, 2018 (CEC, 2018). A Closure Work Plan was also submitted by CEC to the Michigan Department of Environment, Great Lakes, and Energy (EGLE), who approved it on October 16, 2018 and clarified the workplan on September 20, 2019 (Golder, 2019). MERG acquired the property on April 16, 2020, and has been excavating the CCR material from the impoundments since August 2020. Ash removal was

completed in April 2022. Since the last semiannual selection of remedy update in January 2022, the following activities have been conducted by MERG:

- ✓ Monitoring well MW-15011 was abandoned.
- ✓ Monitoring well MW-15014 was replaced with well MW-15014R.
- ✓ The final ash removal verification inspections were completed in April 2022.
- ✓ Semiannual groundwater assessment monitoring was completed in May 2022.
- ✓ CCR excavation and transport offsite is complete, pending EGLE approval of ash removal verification report.
- ✓ Dewatering was ceased in May 2022.

### **Progress Towards Remedy Selection**

An ACM was submitted to EGLE on September 11, 2019, by CEC. MERG is following the CEC developed ACM for the Site, and follow the adaptive management strategy, which includes measures to remove source material, reduce infiltration, and minimize the potential future migration.

As described above, source removal was completed in April 2022 and dewatering ceased in May 2022. After the pumps were turned off, the excavation has been infilling with groundwater. Groundwater conditions have been equilibrating, and it is anticipated that groundwater quality conditions will improve in future monitoring events.

It is anticipated that the remedy selection process for addressing affected groundwater will proceed following the ash removal. Additionally, MERG will continue executing the self-implementing groundwater compliance schedule in conformance with §257.90 - §257.98, which includes semiannual assessment monitoring in accordance with §257.95 to monitor groundwater conditions and inform the remedy selection. The final remedy will be formally selected per §257.97 once the selected option is reviewed and commented on by EGLE and a public meeting is conducted at least 30-days prior to the final selection as required under §257.96(e).

The following activities are proposed to be completed or initiated in the next 6-month period:

- removal and abandonment of dewatering and water treatment infrastructure, and
- continued semiannual groundwater assessment monitoring.

## References

Consumer Energy Company. March 30, 2018. Notification of Intent to Close Two CCR Units. B.C. Cobb Generating Facility Bottom Ash Pond and Ponds 0-8 Closure Plan, Muskegon, Michigan.

Consumer Energy Company. January 15, 2019. Notification of Appendix IV Constituent Exceeding Groundwater Protection Standard per §257.95(g). B.C. Cobb Generating Facility Bottom Ash Pond and Ponds 0-8, Muskegon, Michigan.

Golder Associates Inc. May 30, 2018 clarified October 16, 2018 and September 20, 2019. BC Cobb Ponds 0-8 and Bottom Ash Closure Work Plan, Muskegon, Michigan. Prepared for Consumers Energy Company.

TRC Environmental Corporation. September 11, 2019. Assessment of Corrective Measures, Consumers Energy, Former BC Cobb Power Plant, Bottom Ash Pond & Ponds 0-8, Muskegon, Michigan. Prepared for Consumers Energy Company.