



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
MATERIALS MANAGEMENT DIVISION



PHILLIP D. ROOS  
DIRECTOR

January 13, 2025

VIA EMAIL

Lara L. Zawaideh, Associate Vice President  
100 Oakbrook Drive, Suite 200  
Ann Arbor, Michigan 48104

Dear Lara L. Zawaideh:

SUBJECT: J.B. Sims Generating Station; Revised Hydrogeologic Monitoring Plan;  
Ottawa County; Waste Data System Number 445580

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has reviewed the document titled, "Hydrogeologic Monitoring Plan for Compliance with Michigan Part 115 Solid Waste Management Regulation" revised and received on November 1, 2024. After review, EGLE has identified additional areas for revision within the Revised Hydrogeologic Monitoring plan as outlined below.

**Section 1.3**

Text in the Hydrogeologic Monitoring Plan (HMP) indicates PZ-17 and PZ-20 hydraulic conductivity will be retested in 2024 due to unusually high values. Has this been completed?

**Section 2.1.2**

The second sentence in the first paragraph appears unfinished and is repeated in the following sentence.

**Section 2.4**

EGLE questions if it would be appropriate to monitor water quality in the Grand River due to Groundwater Surface Water Interface (GSI) exceedances of Total Dissolved Solids (TDS), and Chloride at MW-9, MW-03 and MW-04.

**Section 3.1.2**

- The list of Statistically Significant Increases (SSI) appears to be missing some wells and analytes when compared to the October 2023 sampling event as referenced in the text. Please refer to Tables 5 and 6 in the 2023 Annual Groundwater Monitoring Report.
- The last sentence in the last paragraph has spacing issues at "with40" and "R 299.4443the"

### **Section 3.2.2**

The list of SSI's appears to be missing some wells and analytes when compared to the October 2023 sampling event as referenced in the text. Please refer to Tables 5 and 6 in the 2023 Annual Groundwater Monitoring Report.

### **Section 3.7.3**

#### *Recordkeeping*

Quarterly Monitoring Reports should also be placed on the operating record as it becomes available.

### **Figure 2**

Please provide wetland labeling on Figure 2.

### **Appendix E**

#### *Section 1.2*

Due to dynamic groundwater conditions at the site, water level collection should be completed in one day, or prior to any significant precipitation event, if possible.

### **Appendix F**

#### *Section 2.1.4*

The reference to Table 5 in the fifth paragraph should be referring to Table 1.

#### *Section 2.2.3*

Table 3: EGLE does not agree with the upper tolerance limits calculated for Mercury. Mercury was non-detect in all sampling events at all three background monitoring wells with a reporting limit of 0.16 µg/L. The GSI compliance value for Mercury in the State of Michigan is 0.0013 µg/L, which is lower than the reporting limit and proposed Groundwater Protection Standard (GPS). Because there were no detections of Mercury above the reporting limit, it would be inappropriate to use the reporting limit as the GPS, given the compliance value is lower. 0.0013 µg/L should be the GPS set for Mercury.

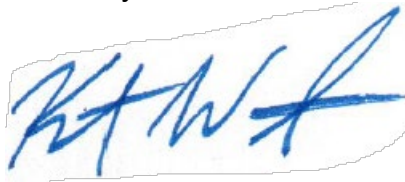
#### *Section 2.2.4*

Text should also reference 11519b(9)(b) for clean closure options, as the site has the option to comply with 40 CRF 257.102(c) or 11519b(9)(b) according to Part 115.

Please review these deficiencies and correct them as necessary or provide a response. If after review, the site would like further discussion or clarification on any of the content provided, please contact Kent Walters at [WaltersK7@Michigan.gov](mailto:WaltersK7@Michigan.gov) or by phone at 616-278-4350.

Lara L. Zawaideh  
Page 3  
January 13, 2025

Sincerely,

A handwritten signature in blue ink, appearing to read 'KtW', is placed on a small, rectangular piece of white paper with a slightly irregular, torn edge. The signature is fluid and cursive.

Kent A. Walters, Geologist  
Materials Management Division  
Grand Rapids District Office  
Department of Environment, Great Lakes  
and Energy

CC: Derek Gajdos, City of Grand Haven  
Molly Reeves, HDR  
Tanten Buszka, HDR  
Fred L. Sellers, EGLE  
Tim Unseld, EGLE