



REPORT

J.H. Campbell Generating Facility
2024 Facility Inspection Report
West Olive, Michigan

Pursuant to 40 CFR 257.84

Submitted to:

Consumers Energy Company

1945 W. Parnall Road
Jackson, Michigan 49201

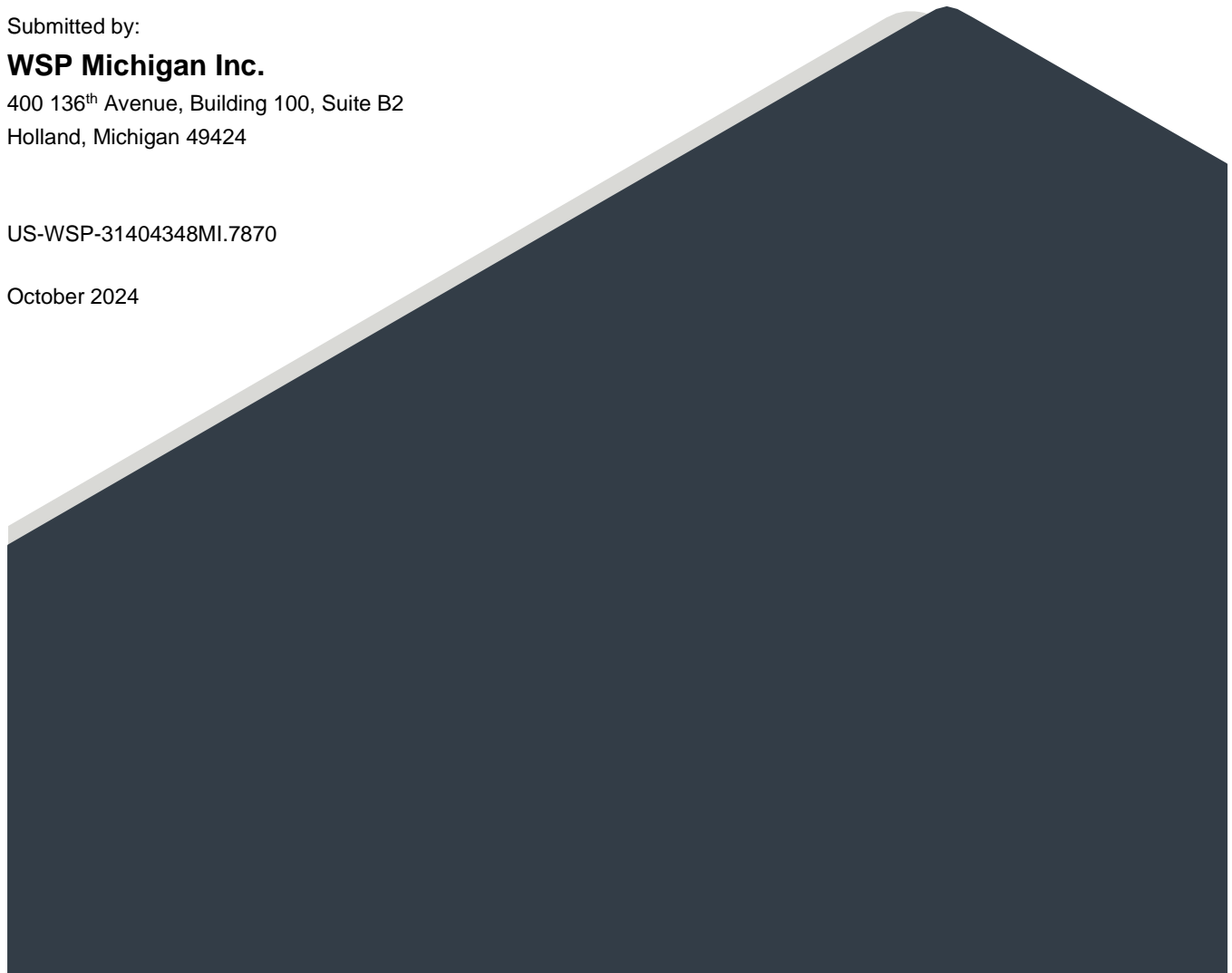
Submitted by:

WSP Michigan Inc.

400 136th Avenue, Building 100, Suite B2
Holland, Michigan 49424

US-WSP-31404348MI.7870

October 2024



Certification

Professional Engineer Certification Statement [40 CFR 257.84]

I hereby certify that, having reviewed the attached documentation and being familiar with the provisions of Title 40 of the Code of Federal Regulations Section 257.84 (40 CFR Part 257.84), I attest that this Annual Inspection Report is accurate and has been prepared in accordance with good engineering practices, including the consideration of applicable industry standards, and with the requirements of 40 CFR Part 257.84.

WSP Michigan Inc.



Signature

October 6, 2024

Date of Report Certification

Brian A. Brown, PE

Name

6201311749

Professional Engineer Certification Number

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APPENDICES

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1.0 INTRODUCTION

On April 17, 2015, the United States Environmental Protection Agency (EPA) issued the Coal Combustion Residual (CCR) Resource Conservation and Recovery Act (RCRA) Rule (40 CFR 257 Subpart D) (“CCR RCRA Rule”). The CCR RCRA Rule requires owners or operators of existing CCR landfills to have those units inspected on an annual basis by a qualified professional engineer (QPE) in accordance with 40 CFR 257.84(b). The annual QPE inspections are required to be completed and the results documented in inspection reports per CFR 257.84(b)(2) for landfills.

WSP Michigan Inc. (WSP) was retained by Consumers Energy Company (CEC) to perform the QPE annual inspection of the Dry Ash Landfill at the J.H. Campbell Generating Facility (JH Campbell) to document, to the extent reasonable based on information provided by CEC and the limits of the visual inspection; that the design, construction, operation, and maintenance for the CCR unit is consistent with recognized and generally accepted good engineering standards. WSP reviewed available information regarding the status and condition of the CCR unit and performed an onsite visual inspection to identify signs of distress or malfunction of the CCR unit and visible leachate collection system features.

2.0 BACKGROUND AND DOCUMENT REVIEW SUMMARY

The Dry Ash Landfill serves as the facility’s primary disposal area for dry ash and currently consists of six dual lined landfill cells and two leachate storage ponds. Total permitted capacity of the landfill, per the most current Construction Permit Application (CPA) Number 4173 dated November 30, 2021, is 10,032,000 cubic yards (CY) with approximately 6,177,295 CY consumed at the time of the inspection, per Consumers reporting. It should be noted that the total permitted volume capacity will be achieved once the remaining permitted cells have been constructed and filled.

At the time of the 2024 inspection; Cells 1, 2, 3, 4, 5, and 6 had been constructed with active filling occurring in uncapped portions of Cell 4, Cell 5, and Cell 6. Phase 6 of closure construction was completed in 2019 on portions of Cells 3 and 4. A final cover system was in place on Cell 3, the eastern portion of Cell 4, the north and east slopes of Cell 2, and the north and west slope of Cell 1.

The applicable available information reviewed for this assessment is summarized in Table 1 below.

Table 1: Summary of Background Document Review

Document	Date	Author
Weekly inspections performed by CEC	July 2023 – July 2024	Dry Ash Landfill Qualified Personnel
J.H. Campbell Dry Ash Landfill 2023 Annual RCRA CCR Landfill Inspection Report	October 2023	WSP Michigan Inc.
J.H. Campbell Dry Ash Landfill 2022 Annual RCRA CCR Landfill Inspection Report	October 2022	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill Solid Waste Disposal Area Construction Permit	November 2021	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2021 Annual RCRA CCR Landfill Inspection Report	October 2021	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2020 Annual RCRA CCR Landfill Inspection Report	October 2020	Golder Associates Inc.

Document	Date	Author
J.H. Campbell Dry Ash Landfill 2019 Annual RCRA CCR Landfill Inspection Report	October 2019	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2018 Annual RCRA CCR Landfill Inspection Report	October 2018	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill Construction Permit Upgrade Request Cells 5 through 9	March 2018	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2017 Annual RCRA CCR Landfill Inspection Report	October 2017	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2016 Annual RCRA CCR Landfill Inspection Report	October 2016	Golder Associates Inc.
J.H. Campbell Dry Ash Landfill 2015 Initial Annual RCRA CCR Landfill Inspection Report	January 2016	Golder Associates Inc.
Surveillance Monitoring Programs (SMPs)	December 2010, Revised 2015	CEC
J.H. Campbell Ash Storage Facility Expansion	November, 1993	STS Consultants Ltd.

3.0 2024 VISUAL INSPECTION

WSP performed an onsite inspection of the Dry Ash Landfill on August 6, 2024 and August 7, 2024. WSP inspectors Brian Brown, PE and Scott Fulmer, were accompanied by two CEC representatives, as follows:

- Mr. George McKenzie, PE - CEC System Engineering Department
- Mr. Joseph Firlit, PMP - CEC Manager Engineering Support

The inspection checklist form is provided in Appendix A. The checklist includes observations and recommendations resulting from the visual inspection and also includes the following information as stipulated in 40 CFR 257.84(b):

- Any changes in geometry of the structure since the previous annual inspection.
 - At the time of inspection, the southern portion of the landfill (Cell 4, Cell 5, and Cell 6) was undergoing active filling.
- Approximate volume of CCR at the time of inspection.
 - The volume of airspace consumed within the Dry Ash Landfill at the time of inspection was estimated at approximately 6,177,295 CY.
- Appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures.
 - None were observed or noted.

- Any other change(s) which may have affected the stability or operation of the CCR unit since the previous inspection.
 - None were observed or noted.

The checklist categorizes observed conditions of the impoundment or appurtenant structures as either acceptable, monitor/maintain, investigate, or repair, which are defined as follows:

- **Acceptable:** The condition was visually documented to be acceptable, requiring no action beyond periodic inspection in accordance with the SMP and typical maintenance.
- **Monitor/Maintain:** The condition was visually identified to exhibit the potential for or show existing degeneration that should either be monitored or maintained as detailed in the checklist.
 - Items identified in this category are not considered a deficiency or release as classified under 40 CFR 257.84(b)(5) requiring immediate action by CEC.
- **Investigate:** The limitations of the visual inspection did not allow for an opinion to be made on the condition of the item observed, and WSP recommends additional investigation to categorize the item.
- **Repair:** WSP recommends that items identified with a repair designation exhibited conditions that should initiate measures be taken to rectify the area of concern.
 - It should be noted that no items identified for repair were considered a deficiency or release as classified under 40 CFR 257.84(b)(5) requiring immediate action by CEC.

Based on a review of previous inspection reports listed in Table 1 compared to conditions noted during the inspection, the following changes were observed:

- Localized areas of sparse vegetation, and some undesirable woody vegetation observed in localized areas of the Dry Ash Landfill final cover;
- Small animal burrows, animal cover damage, and minor erosion noted along north, east, and south sides of the Dry Ash landfill along storm water berms and toe;
- Minor erosion in localized areas on the Dry Ash Landfill and active measures to address historical erosion were observed; and
- Area of leachate collection sand erosion causing exposure of geocomposite observed on the Dry Ash Landfill Cell 5/6 intercell berm.

4.0 LIMITATIONS OF ASSESSMENT

WSP has conducted the site inspection and prepared this report for the Dry Ash Landfill at J.H. Campbell. The factual data, assessment, interpretations, and recommendations provided herein are based on the results of field observations from site inspections performed by WSP and review of previous site inspection reports provided to WSP by CEC and pertain to the specific project as described in this report and are not applicable to any other project or site location.

WSP has prepared this report in a manner consistent with that level of care and skill ordinarily exercised by members of the engineering and science professions currently practicing under similar conditions and has

characterized the site conditions within the limitations of the scope of services as defined by CEC and subject to the time limits and physical constraints applicable to this report. No other warranty, expressed or implied, is made. Any change of site conditions, purpose, development plans, or operation may alter the validity of this report. WSP cannot be responsible for use of this report, or portions thereof, unless WSP is requested to review and, if necessary, revise the report.

5.0 CLOSING

This report has been prepared in general accordance with normally accepted civil engineering practices to fulfill the Resource Conservation and Recovery Act (RCRA) reporting requirements in accordance with 40 CFR 257.84(b)(2). WSP has reviewed the available information on the J.H. Campbell Dry Ash Landfill and performed an onsite visual inspection. WSP's assessment is limited to the information provided by CEC and to the aspects that could be inspected visually in a safe manner. WSP cannot attest to the condition of subsurface or submerged structures.

WSP Michigan Inc.



Brian Brown, PE
Consultant, Geotechnical Engineer



Blaine Litteral, PE
Vice President

APPENDIX A

Visual Inspection Checklist

CCR LANDFILL VISUAL INSPECTION CHECKLIST

Facility Name: J.H. Campbell Dry Ash Landfill

Owner: Consumers Energy Company (CEC)

Purpose of Facility: Dry Ash Disposal

County, State: Ottawa County, Michigan

Inspected By: Brian Brown and Scott Fulmer

Inspection Date: August 6th & 7th, 2023

Weather: 72-degrees F, Cloudy.

ITEM					REMARKS
	Acceptable	Monitor/Maintain	Investigate	Repair	
1. General Conditions					
a. Current volume of CCR					Total Airspace Consumed: 6,177,295 CY Volume of leachate drainage layer: 140,355 CY Volume of CCR: 6,036,940 CY
b. Alterations	X				
c. Grass cover	X				
d. Settlement / misalignment / cracks	X				None observed.
e. Leachate Collection	X				.
2. Landfill Slope					
a. Erosion – liner exposed?		X			Exposed geocomposite on Cell 5/6 intercell berm, see note 3.
b. Rodent burrows		X			Burrows observed on final cover benches, adjacent to leachate vaults, and near toe of slope, see note 3.
c. Vegetation	X				Some localized areas of sparse vegetation, see note 3.
d. Cracks/settlement	X				None observed.
e. Riprap/other erosion protection	X				
f. Slide, Slough, Scarp	X				None observed.

ITEM	Acceptable	Monitor/Maintain	Investigate	Repair	REMARKS
g. Benches	X				
h. Final Cover		X			Localized areas of minor erosion on final cover slopes, see note 3.
i. Downchutes	X				
3. Crest					
a. Soil condition	X				
b. Comparable to design width or previous inspection	X				
c. Vegetation	X				
d. Rodent burrows	X				
e. Exposed to heavy traffic	X				
f. Damage from vehicles / machinery	X				None observed.
4. Toe					
a. Vegetation	X				
b. Rodent burrows		X			Small animal burrows observed near toe of slope, see note 3.
c. Settlement	X				None observed.
d. Drainage conditions	X				
e. Seepage	X				None observed.

Notes:

- 1) Leachate collection system inspection was limited by visual observation of surficial components of the system, i.e. condition of riser pipes.
- 2) Maintain erosion controls per the SMP. This is not a deficiency or release as classified under 40 CFR 257.84(b)(5).
- 3) Features observed and documented in this checklist were not considered a deficiency or release as classified under 40 CFR 257.84(b)(5) and required no immediate action beyond periodic inspection in accordance with the SMP and typical maintenance.

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