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General Manager
Annette S. Allen

May 5, 2014

Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Response to the request for Action Plan regarding Grand Haven Board of Light & Power – J.B. Sims Power Plant.

Mr. Hoffman,

This letter is in response to an April 24, 2014 letter written by the USEPA delivered via email from Jana Englander, Office of Resource Conservation and Recovery. The letter lists the recommendations which stem from an onsite visit conducted by Dewberry Engineers Inc. I intend to respond to the recommendations below by copying your paragraph in italics and replying immediately below each recommendation.

Recommendations Regarding the Structural Stability

The utility needs to perform structural stability calculations for both the East Pond and West Pond dikes under static and seismic conditions to show the dikes have sufficient Factors of Safety to prevent failure and releases to the environment.

It is recommended that a liquefaction potential analysis be performed if a qualitative analysis of embankment soil material or underlying foundation materials indicates the soil type is susceptible to liquefaction.

Grand Haven Board of Light & Power (GHBLP) has contracted a local firm to perform the static and seismic study along with the potential qualitative analysis of embankment soil material or underlying foundation materials if needed. The Contractor is Soils & Structures from Muskegon Michigan. They will have a Certified Michigan Professional Engineer leading the project. The hand's on study is expected to be complete before the end of May 2014, with the report to be provided to GHBLP shortly thereafter.

Recommendations Regarding the Hydrologic/Hydraulic Safety

Hydrologic and hydraulic analyses of both the East and West Ponds' performance under flood conditions should be performed.

This analysis will also be a part of the above study that will be taken place by Soils & Structures.

Recommendations Regarding the Supporting Technical Documentation

Dewberry recommends that new dam design documents be generated to reflect the removal of the spillway.

GHBLP had to eliminate the spillway for numerous safety concerns. GHBLP is attempting to find the drawings of the pond in an electronic format to remove the spillway in the documentation. If an electronic format is unavailable, the GHBLP will note on the current drawing that the spillway has been removed.

Recommendations Regarding the Maintenance and Methods of Operation

We recommend that formal maintenance procedures be adopted for both the East and West Ponds; the Michigan Dam Safety office can provide guidance on creating one. There needs to be written procedures and provisions for follow up actions.

Subsequent to the Draft report, the utility has stated that they are in the process of developing such written procedures (Appendix D, Doc 11 of the final report).

The GHBLP management will be making monthly observations of the East and West Ponds to observe any maintenance needs that may arise. When one or both ponds are completely empty the Maintenance Supervisor will determine if additional clay is needed or other repairs may be necessary.

Recommendations Regarding the Surveillance and Monitoring Program

A recommendation on a surveillance program for both the East and West Ponds is dependent on the type of maintenance plan developed, post Dewberry visit. Formal maintenance procedures for both the East and West ponds should be documented.

Subsequent to the Draft report, the utility has stated that they are in the process of developing such written procedures (Appendix D, Doc 11 of the final report).

Forms have been developed and implemented for facility personnel to enhance the Surveillance and Monitoring Program of both the East and West Ponds.

Recommendations Regarding Continued Safe and Reliable Operation

Dewberry recommended that the ponding seen during the site visit be addressed by the utility. Subsequent to the Draft report, the utility has provided information stating that "the plant has been re-sloped and [the plant has] repaved the roadway to the south of the ponds as part of its regular maintenance, in part to redirect storm water" (Appendix D, Doc 11 of the final report).

The asphalt along the South end of the ponds has been resurfaced and sloped. Sloping helps relieve water from standing at the end of the roadway that runs along the west end of the West Pond. Following receiving the anticipated favorable results of the static and seismic study, GHBLP intends to seed the south end of the ponds in order to help deter additional storm water ponding, avoid erosion and improve esthetics.

I hope the contents of this letter are sufficient in providing the information you are looking for regarding the status of this project. As you can see, GHBLP has been working towards putting this situation to rest, but with Mother Nature providing us an extra-long winter, the study had to

be postponed until now. If you have any questions regarding this project please do not hesitate to contact me.

Sincerely,

Paul Cederquist
Environmental Compliance Manager
Grand Haven Board of Light & Power
616 607 1292
pcederquist@ghblp.org

A handwritten signature in cursive script that reads "Paul Cederquist". The signature is written in black ink and includes a long horizontal flourish extending to the right.

cc:

Annette Allen
Jeff Chandler