**HDR HMP Comment Resolution Table**
**February 4, 2026**

**Former J.B. Sims Generating Station Hydrogeologic Monitoring Plan**

| Section | 2.4 Surface Water Monitoring Program | | | |
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| **EGLE Comment Sept 10 2025** | After review, some tweaking is still needed to tackle the challenging issue of surface water measuring points drying up due to lowering Lake Michigan levels. Previously we had discussed potentially having "multiple" measuring points for some staff gauges as needed. Meaning there would be a high water level measuring point and a low level monitoring point, but still considered the same staff gauge location. Simply marking the location "Dry" would leave out important information for groundwater flow and surface water influence on groundwater flow. Given this site is highly influenced by surface water features, a plan should be developed to account for both high and low water conditions so that information can be consistently collected. | | | |
| **HDR Action/Response Oct 2 2025** | Internal Wetland - HDR will add a note in the HMP Section 2.4 end of second paragraph that states, "If SG-05 is dry, the gauge at SG-07 will have a surface water elevation that will represent surface water of the internal wetland." | Units 1/2 Impoundment - the gauges in the ponds at the Unit 1/2 impoundment (SG-2, SG-03, SG-04R) are measuring surface water in waste impoundments, so these are not GSI points. When there is surface water in the ponds we will measure it at these gauges, and when water is lower we can rely on the surrounding groundwater wells for contouring. Placing a staff gauge in a marginally-accessible location surrounded by vegetation such as the middle of the waste pond will not significantly improve the monitoring record. | Northern Wetland – we have re-designed the stilling well STW-1 to be a shallow, hand-driven drive point – instrumented with a transducer and staff gauge. We expect to re-install in October. This will monitor surface water level when surface water is there and groundwater when surface water is too far out. It is impractical to try to "chase" the embayed water by placing a staff gauge further out into the wetland because it is inaccessible and too thick with vegetation to read from far away. The gradient between groundwater at MW-08 and surface or groundwater at STW-1 will continue to provide the gradient across the wetland boundary, which is the presumptive GSI boundary to confirm flow direction across the boundary. We will add a note in the HMP Section 2.4 that states, "If STW-01 does not have surface water and is "dry", the transducer placement below the groundwater surface in a drive point will recorded as the groundwater elevation at that location." | We don't expect STW-02 (South Channel Grand River) or STW-03 (Main Channel Grand River) to be dry. |
| **EGLE Comment Oct 7 2025** | Does it make sense to keep SG-05 as a monitoring point for surface water levels if SG-07 is representative for both high and low water levels? | Is there one current location that is the most unlikely to dry up? There are currently 3 staff gauges monitoring the same small body of water. This redundancy was pointed out to the previous consultants and it seems that one staff gauge would be sufficient to monitor surface elevations for the waste impoundments unless there is reasoning to keep the other monitoring points. | Would it make more sense to move STW-01 further to the East where there is "deeper" waters and less shoreline gains/losses? The photo below shows the high water level in green (2020) and lower water levels in blue (2025). There seems to be less than 20' of shoreline gains since 2025 that may make getting consistent surface water levels easier in the area circled in red. | No responding comment from EGLE regarding STW-2 and STW-3 |
| **HDR Action/Response Oct 17 2025** | Staff gauge SG-05 may be redundant with SG-07, but it remains good confirmation of the applicability of SG-07 to the entire internal wetland. SG-05 is checked for water during each monitoring event for the purpose of collecting surface water samples; recording the water level requires negligible additional effort. | We concur that staff gauges SG-02, SG-03, and SG-04R are effectively redundant. A transducer has been hosted at SG-02 since December 2023, and therefore should continue to be monitored. We will discuss removing SG-03 and SG-04R with the City. | The suggestion regarding a new location for STW-1 is understood, but the primary goal of modifying this point is to describe groundwater / surface water interaction nearer to Units 1/2 (generally west of its present location); and during periods like the present when surface water has receded, the interim goal is to better define groundwater contours in this area. Since the August monitoring event, river stage has declined approximately another 10 inches, and it is unlikely that any standing surface water will be present along the island perimeter until at least next summer. Reconnaissance is needed to determine if a better and accessible location can be identified, but to best clarify hydrology north of Units 1/2, the preferred location is near or further west of the present location. | |
| **EGLE Comment Oct 20 2025** | acceptable to EGLE | acceptable to EGLE | Surface water levels from the northern wetland are important as it should give you groundwater flow information across the site, not just next to Unit 1/2. A shallow drive point would not provide accurate surface water information if the staff gauge is dry at the same location. Maybe it would be appropriate to have two surface water measurement locations, given the large shoreline gain/loss differences along the Northern Wetland | |

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| **HDR Action/Response Oct 27 2025** | |  | To clarify, meaningful surface water measurements are currently not possible at any point along the island's northern shoreline, and may not be for some time, as illustrated in the photo below. In the absence of surface water, our short-term plan is to install a shallow groundwater drive point (below the muck layer in this photo) which will be instrumented to record shallow groundwater levels in the north wetland; and to include a staff gauge at the same location that though currently dry, will be instrumented to document surface water stage when it returns.<br><br>The objective for both the drive point (shallow groundwater) and the staff gauge (surface water) will be to better describe flow direction across the GSI boundary. We are assuming that the GSI boundary is the wetland/upland boundary as opposed to where surface water is in the wetland. If that is not the correct assumption, please let us know. Since the drive point/gauge would be located in the wetland (north of the wetland boundary), having a way to measure the water level in the wetland, whether it is shallow groundwater or surface water, will give us the flow direction across the GSI boundary (wetland to groundwater vs groundwater to wetland).<br><br>For reference, the photo below illustrates surface water conditions on the morning of 10/20/25. The wetland is nearly dry throughout, with a little residual ponding in the center. USACE projects that Lake Michigan levels (and by proxy, the Grand River) will further decline through the winter, with a median projection of a 4-inch decline, and a maximum (95th percentile) decline of nearly a foot. | |
| **EGLE Comment Oct 27 2025** | | | With the recent photo provided, it does look challenging as it appears the majority of the wetland area is drying up. Is there no location within the Northern Wetland that has deeper water that a staff gauge would be suitable? As mentioned, the surface water level information is important as it sometimes documents surface water is "flowing through" the island from the north, or groundwater is discharging from the island to the Northern Wetland depending on measured groundwater and surface water levels. That component would be lost if only groundwater was measured.<br>The GSI compliance point would be the delineated wetland boundary. EGLEs concern is not the compliance point, but rather the loss of valuable groundwater flow information and surface water/groundwater interaction. | |
| **HDR Action/Response Feb 4 2025** | | | There is currently no standing water near the northern shore of the island (November 2025). In November 2025, HDR reconstructed STW-1 as a shallow groundwater monitoring point, screened from 2 to 3 feet below grade (STW-1DP), paired with a stilling well (STW-1SW), which will measure surface water stage but is currently dry. | |
| **EGLE Comment Dec 4 2025** | I think we will need to continue to problem solve for how to collect consistent surface water elevations due to fluctuating Great lakes/Grand River levels. When I was onsite mid-November, SG-07 was also dry, see below for conditions on Nov. 19. If we were to proceed with the current plan, we would have no surface water elevations from the internal or northern wetland. |  | | |
| **HDR Action/Response Feb 4 2025** | HDR Proposes to install staff gauge SG-07A in the center of the channel to supplement SG-07 (located on the bank) when surface water is limited to a narrow channel. | | | |

Note: This table includes all comments received since July 25, 2025. Preceding comments are included in 2025-07-25 EGLE HDR HMP Comment Resolution Table.