Former J.B. Sims Generating Station Hydrogeologic Monitoring Plan

Section	EGLE Comment	HDR Action/Response
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?	Yes, though the retesting observed similar anomolous results compared to other wells on the site. Section 1.3 was revised to include 2024 testing.
Section 2.1.2	The second sentence in the first paragraph appears unfinished and is repeated in the following sentence.	This sentence has been deleted in the document.
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	Given the significant flow of the Grand River relative to the very low groundwater flux into the Grand River and TDS and chloride concentrations in groundwater at the GSI points, it seems highly likely that concentrations in samples collected from the Grand River would be immediately diluted. Sample points on the Grand River would be a shallow grab sample along the bank and would not be representative of the river and mixing. It is also unclear how the surface water data would be interpreted and how it would be used for any decisions.
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”	The SSI list was revised. The space was added to the sentence in the document.
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.	The SSI list was revised.
Section 3.7.3	Recordkeeping Quarterly Monitoring Reports should also be placed on the operating record as it becomes available.	This was added to 3.7.3.
Figure 2	Please provide wetland labeling on Figure 2.	Wetland polygons were added to the figure.
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.	This was added to Section 1.2.
Appendix F - *Section 2.1.4*	The reference to Table 5 in the fifth paragraph should be referring to Table 1.	Revised to Table 1.
Appendix F - *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.	Table 3 was edited to reflect the lower GPS. To evaluate mercury to this low level, the laboratroy method for mercry had to be changed to Low-level mercury method 1631E. This was changed in the Appendix E SOP (now Appendix F after this edit) and in Table 11 of the HMP, and the sampling procedures for the collection of groundwater were edited in the SOP to reflect procedures to achieve low-level detection limits at teh labortaory, which requires a clean-hands dirty-hands technique.
Appendix F - *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.	Section 2.2.4 was revised to: 40 CFR 257.102(c) of the CCR Rule and 11519b(9)(b) of the State Part 115 regulations addresses criteria to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. .

May 21, 2025