

From: [Walters, Kent \(EGLE\)](#)
To: [Zawaideh, Lara](#); [EGLE-MMD-CCR](#)
Cc: dqajidos@grandhaven.org; [Reeves, Molly](#); [Buszka, Tanten](#); [10337505 Grand Haven-Harbor Island Env](#)
Subject: Re: Former J.B. Sims Generating Station Assessment of Corrective Measures
Date: Friday, August 23, 2024 10:19:36 AM

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Hi Lara,

EGLE has reviewed the Assessment of Corrective Measures report for JB Sims submitted on August 5, 2024. After review EGLE does have the following comments:

Section 2.3: The report lists potential other locations where CCRMUs may be present. EGLE previously had discussions with the Grand Haven Board of Light and Power (GHBLP) where they discovered coal/coal ash near the footings of the Former JB Sims plant. EGLE suggests connecting with the GHBLP to obtain more detailed information on the location and quantity and if it was all removed.

Section 3.1 Page 14, Last Paragraph: The Appendix C reference should be referring to Appendix B.

Section 3.2 Page 17, Typo: "der the assessment monitoring program" should be "Per the assessment monitoring program".

Section 4.5: Although the drinking water pathway is incomplete, the criteria must be utilized in the Remedial Action Plan, in the same way it was considered when developing groundwater protection standards.

Section 4.5: Page 31 Second Paragraph: The Figure 3 reference should be referring to Figure 4.

Section 5.3: The report indicates that, "in-situ treatment by injection or via permeable reactive barrier (PRB) was also considered but not evaluated because there is no proven technology to treat PFAS in-situ." EGLE disagrees with this statement as there are several proven products that are currently being used for in-situ treatment of PFAS. These products are provided below for review

BAM:

[BAM Injection PFAS - ORIN RT](#)

BOS Products:

[Remediation Products Inc. | Home | 720-639-8771 \(trapandtreat.com\)](#)

COGAC

[Products | remtech \(remingtontech.net\)](#)

EGLE requests that in-situ injections or PRBs be reconsidered as a potential remedial option. The EGLE In-Situ Remedial Technology (InSiRT) Technical Advisory group is involved in and has reviewed

several in-situ PFAS treatment projects. If requested, a meeting could be organized with the InSiRT team to provide overview of aforementioned products, their implementation and their success.

Table 8: Soil Direct Contact Part 201 criteria should also be listed on the table as there are some samples that do exceed the threshold.

Please let me know if The City of Grand Haven has any questions or comments about the information provided above, or if The City of Grand Haven would like to set up a discussion with the InSiRT TAPS team to discuss potential in-situ PFAS treatment options.

Kent.

From: Zawaideh, Lara

Sent: Monday, August 5, 2024 8:52 PM

To: Walters, Kent (EGLE) ; EGLE-MMD-CCR

Cc: dgajdos@grandhaven.org ; Reeves, Molly ; Buszka, Tanten ; 10337505_Grand Haven-Harbor Island Env <10337505_GrandHaven-HarborIslandEnv@hdrinc.com>

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Hi Kent

The ACM for the above referenced site is located here <https://acrobat.adobe.com/link/track?uri=urn:aaid:scds:US:856f1ec1-2b21-39f9-9d46-e81e287cd201>

Let us know if you have any questions or would like to discuss.

Lara L. Zawaideh PE (NE, IA, IL, MI, and FL) ENV SP

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