

# Memo



**To:** John Schultz – Marquette Board of Light & Power  
**From:** Michael D. Carpenter, P.E. - GEI Consultants, Inc.  
**Date:** October 5, 2020  
**Re:** Closure Notification - Ash Pond Cells 1 – 5  
Shiras Steam Plant  
Marquette, Michigan  
GEI Project No. 1903625

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In accordance with 40 CFR §257.102(h), the owner or operator of a coal combustion residuals (CCR) unit must prepare a notification of closure of a CCR unit. The notification must include the certification by a qualified professional engineer as required by 40 CFR §257.102(f)(3). Per 40 CFR §257.102(h), this notification must be placed in the facility's operating record within 30 days of completion of closure of the CCR unit.

On September 4, 2020, GEI concluded that the pond and groundwater conditions associated with the Ash Pond at the Shiras Steam Plant met the requirements for closure under §257.102(c) and that the closure was completed in accordance with the Closure Plan, dated January 17, 2020. "I hereby certify that closure of Shiras Steam Plant CCR Ash Pond Cells 1 – 5 at the Marquette Board of Light & Power facility was performed in accordance with the April 2020 Closure Plan and the requirements in federal regulation 40 CFR § 257.102 of the Standards of CCR in Landfills and Impoundments published April 17, 2015. I am a duly licensed Professional Engineer under the laws of the State of Michigan."

A handwritten signature in black ink, appearing to read "M. D. Carpenter".

Michael D. Carpenter, P.E.  
Vice President