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Regulation Compliance Report Post-Closure Plan

Presque Isle Power Plant Ash Landfill #3
Marquette, Michigan

Submitted to:

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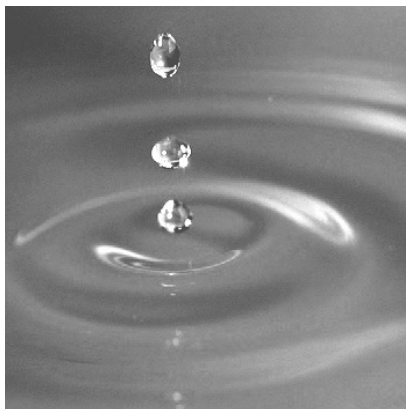


Table of Contents

1.	Introduction	1
2.	Post-Closure Narrative	2
2.1	Final Cover System Maintenance	2
2.2	Ground Water Monitoring Network	3
3.	Conclusion and Certification	4

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1. Introduction

We Energies owns and operates a solid waste disposal facility located approximately 4 miles west of the Presque Isle Power Plant (PIPP). The landfill is located in the N ½ of the SE ¼ of Section 6, Township 48 North, Range 25 West, Marquette County, Michigan. The landfill property is surrounded by forested uplands and accessed by a private paved haul road from the power plant. The We Energies PIPP Landfill No. 3 is regulated as a Type III landfill by the Michigan Department of Environmental Quality (MDEQ) in accordance with Part 115, Solid Waste Management of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The design, construction, operation, closure, and post-closure care requirements are specified in the MDEQ approved Construction Permit dated February 27, 2002 and the current Operating License. The construction of Cell 1 was completed in 2003 and placed into service on October 8, 2005. Cell 2 was constructed in 2007 and placed into service on October 10, 2008. In 2014, We Energies installed final cover over portions of the north, east, and west perimeter slopes of Cell 1.

In addition to the state regulations, the landfill is also required to comply with 40 CFR Part 257 Subpart D – *Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* and is defined as a CCR unit and existing CCR landfill in accordance with § 257.53. Future landfill cells are permitted by the MDEQ in the approved construction permit application and defined as lateral expansions under § 257.53 when constructed.

This report fulfills the requirements for a written Post-Closure Plan for the PIPP Landfill No. 3 in accordance with § 257.104 – *Post Closure Care Requirements*. In accordance with § 257.104(d)(1) this report describes the monitoring and maintenance activities for the CCR unit, and the frequency at which these activities will be performed; provides the name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period; and provides a description of the planned uses of the property during the post-closure period.

This post-closure plan includes the following sections:

- Section 1 Introduction
- Section 2 Post-Closure Narrative
- Section 3 Conclusion and Certification

2. Post-Closure Narrative

This plan fulfills the requirements for a written Post-Closure Plan for the PIPP Landfill No. 3 in accordance with § 257.104 – *Post Closure Care Requirements*.

Following the final closure of PIPP Landfill No. 3, We Energies will be responsible for the post-closure care of the facility. In accordance with § 257.104(b), We Energies is responsible for providing post-closure care and maintenance including maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events; maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§ 257.90 through 257.98, and complying with the recordkeeping requirements specified in § 257.105(i), the notification requirements specified in § 257.106(i), and the Internet requirements specified in § 257.107(i) during the post-closure period. The post-closure care period is for a minimum of 30 years if the owner or operator is under detection monitoring. If the facility is in assessment monitoring, the post-closure care period is extended until the facility returns to detection monitoring.

§ 257.104(d)(ii). Post-closure period facility contact:

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§ 257.104(d)(iii). During the post-closure care period, use of the landfill final cover area will be limited to green space or other activities that do not disturb the integrity of the final cover, base liner, or any other component of the containment, leachate collection, or groundwater monitoring systems.

2.1 Final Cover System Maintenance

Inspection of the final cover system is included in the annual inspection required under § 257.84(b). The annual inspection will note any final cover defects requiring repair.

Maintenance of the final cover will include repairs due to settlement, subsidence, erosion, or other events and regular mowing of the cover vegetation. Final cover system repairs necessitated due to settlement, subsidence, erosion, or other events will be completed as soon as practical. Actions should be taken as soon as practical to restore and protect areas that require maintenance and reestablish vegetation for erosion protection. Final cover repair and maintenance activities will be noted in the annual inspection report required under § 257.84(b)(2).

The final cover will be mowed at a minimum on an annual basis for the first five years to help establish a well-vegetated final cover and at a minimum once every five years thereafter, to inhibit the growth and presence of woody vegetation. Mowing on a more frequent basis may be required to accommodate more vigorous growth rate or to prevent the establishment of woody vegetation. Other techniques may also be employed to aid in the establishment of the desired vegetation and control of invasive grasses and woody vegetation, including but not limited to prescribe burning and selective herbicide applications.

2.2 Ground Water Monitoring Network

We Energies will be responsible for maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§ 257.90 through 257.98. The groundwater monitoring network will be inspected on a semi-annual basis, in conjunction with the groundwater sampling. Any noted deficiencies, damage or required repairs will be completed as soon as practical but prior to the next sampling event. All groundwater monitoring will be completed in accordance with the facility's Groundwater Monitoring Plan for a minimum of 30-years post-closure care period. Provided the site is at detection monitoring at the conclusion of the 30-year post-closure care period, monitoring will cease. However, if groundwater monitoring is at assessment monitoring, groundwater monitoring will continue until monitoring returns to detection monitoring. All sampling and analysis will be completed in accordance with the facility's sampling and analysis plan.

5. Conclusion and Certification

We Energies owns and operates a solid waste disposal facility located approximately 4 miles west of the PIPP in the N ½ of the SE ¼ of Section 6, Township 48 North, Range 25 West, Marquette County, Michigan. The landfill is regulated as a Type III landfill by the MDEQ in accordance with Part 115, Solid Waste Management of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The landfill is also required to comply with 40 CFR Part 257 Subpart D – *Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments*. This plan fulfills the requirements for a written Closure Plan of the PIPP Landfill No. 3, Cells 1 and 2 in accordance with § 257.102 - *Criteria for Conducting the Closure or Retrofit of CCR Units*, describing the engineering design and construction of the final cover system, how the final cover system will meet the applicable performance standards contained in § 257.102(d), an estimate of the maximum inventory of CCR, an estimate of the maximum open area that would require closure at one time, and a generalized schedule based on the anticipated landfill filling rates and disposal volumes.

This Closure Plan was completed under the direction of John, M. Trast, P.E. I am a licensed professional engineer in the State of Michigan in accordance with Article 20 of the Occupational Code, Public Act 299 of 1980, as amended. This document has been prepared in accordance with the Michigan Administrative Rules, Department of Licensing and Regulatory Affairs, Professional Engineers – General Rules, Part 3 – Standards of Practice and Professional Conduct; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR Part 257 Subpart D.



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