

From: [Walters, Kent \(EGLE\)](#)
To: [Reeves, Molly](#); [Zawaideh, Lara](#)
Cc: [Sellers, Fred \(EGLE\)](#); [Unsel, Timothy \(EGLE\)](#); dgajdos@grandhaven.org; [Byks, Andrew](#)
Subject: Re: JB Sims HMP Review
Date: Wednesday, February 19, 2025 3:50:04 PM

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Hi Molly,

Given that Part 115 requires to use the lowest value of either applicable Part 201 values, the MCL, or background if it is higher for the selection of GPS, the site should use analytical methods that allows to meet that standard. The GSI criteria at the JB Sims site is applicable given the presence of the internal wetlands and surrounding waterbodies so the GSI value of 0.0013 ug/L would be applicable and the lowest GPS, assuming background isn't determined to be higher. EGLE directs the site to use certified analytical methodologies that allow data to be reported low enough to compare to these compliance values.

Kent.

From: Reeves, Molly
Sent: Sunday, February 16, 2025 9:47 AM
To: Walters, Kent (EGLE) ; Zawaideh, Lara
Cc: Sellers, Fred (EGLE) ; Unsel, Timothy (EGLE) ; dgajdos@grandhaven.org ; Byks, Andrew
Subject: RE: JB Sims HMP Review

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Hi Kent,

We working on getting your J.B. Sims HMP comments addressed. You have a comment that mercury GPS should be the GSI, which is 0.0013 ug/L. All of our labs have been using 7470 for mercury and the lowest detection limit they can get is 0.16 ug/L. We can ask the lab to change to the "clean hand dirty hand method" 1631E and then get to 0.0005 ug/L. Using this method requires us to modify our sampling protocol, will cost more with the lab, and can be sensitive to airborne dust so we will need to add a trip blank. Just wanting to double check that it is EGLE's guidance for us to switch to this sensitive method to use the recommended GPS versus a different approach. For example, we could use the site-specific background values of non-detect <0.16 ug/L and then we could potentially change the criteria to move into corrective measures could be based on 2 sample detections in a row as opposed to an LCL>GPS.

Thanks, Molly

Molly Reeves

M 734.263.7138

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From: Walters, Kent (EGLE)

Sent: Monday, January 13, 2025 10:58 AM

To: Zawaideh, Lara

Cc: Buszka, Tanten ; Reeves, Molly ; Sellers, Fred (EGLE) ; Unseld, Timothy (EGLE) ;
dgajdos@grandhaven.org

Subject: Re: JB Sims HMP Review

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Hi Lara,

Please see the attached letter providing review of the submitted revised Hydrogeologic Monitoring Plan for the JB Sims coal ash site. This digital copy will be the only copy provided unless it is requested a hard copy be provided via certified USPS mail.

Kent.

From: Zawaideh, Lara

Sent: Friday, November 1, 2024 4:06 PM

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

Cc: Buszka, Tanten ; Reeves, Molly ; Sellers, Fred (EGLE) ; Unseld, Timothy (EGLE) ;
dgajdos@grandhaven.org ; 10337505_Grand Haven-Harbor Island Env <10337505_GrandHaven-HarborIslandEnv@hdrinc.com>

Subject: RE: JB Sims HMP Review

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Hi Kent

Attached please find responses to your comments and a revised document here

<https://acrobat.adobe.com/link/track?uri=urn:aaid:scds:US:cf935e9a-bca8-3ecd-859c-9f892b9700e3>

Please let me know if you have questions.

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

Associate Vice President | Area Resources Business Development Leader
Project Manager

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lara.zawaideh@hdrinc.com

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[Book time to meet with me](#)

From: Walters, Kent (EGLE)

Sent: Thursday, July 11, 2024 3:42 PM

To: Zawaideh, Lara

Cc: Buszka, Tanten ; Reeves, Molly ; Sellers, Fred (EGLE) ; Unseld, Timothy (EGLE) ;
dgajdos@grandhaven.org

Subject: JB Sims HMP Review

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lara,

Please see the attached letter providing review of the submitted Hydrogeologic Monitoring Plan for the JB Sims coal ash site. This digital copy will be the only copy provided unless it is requested a hard copy be provided via certified USPS mail.

Kent A. Walters, Geologist

Materials Management Division

Michigan Department of Environment, Great Lakes, and Energy

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Michigan.gov/EGLE