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STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

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INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:
WASTE MANAGEMENT DIVISION
CADILLAC DISTRICT OFFICE
120 CHAPIN ST W
CADILLAC MI 49601

November 27, 2000

Mr. Glen Dine, Engineer
Traverse City Light & Power
Traverse City, Michigan

Dear Mr. Dine:

SUBJECT: Review and Approval of Sampling Required at Traverse City
Light and Power Ash Disposal Site in Meeting the Consent Order # 641-06-
245-05-92 entered September, 1993

I received the Biannual/Quarterly Groundwater Monitoring Report for the September 2000 sampling event on November 13, 2000, in addition to your cover letter dated November 9, 2000. Thank you.

I reviewed the information submitted. As you stated in your letter, the post-closure sampling requirements, which we agreed upon, were outlined in the Department of Environmental Quality's (DEQ) letter dated February 14, 1997. As you also state in your letter, this agreement was based upon a previous original-monitoring plan, generated by reference in the consent order entered September 1993.

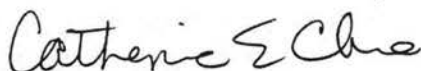
I understand the sampling plan has been implemented with the final sampling planned for December 11, 2000, as reported in RMT's report dated November 6, 2000. They stated that the December sampling event would be the fifteenth and final round of sampling, meeting the post-closure requirements for the ash disposal area outlined in the DEQ's letter, dated February 14, 1997. Our records reflect that you have been providing biannual-sampling data since April 21, 1995, and therefore as agreed, have completed the post-closure-sampling requirement of five years after closure. Based upon this information, I agree with the conclusion that RMT made in their recommendations.

The November 6, 1992, sampling plan was referred to in the consent order # 641-06-245-05-92 entered into in September 1993. That order included a potential 30-year, post-closure requirement if the site actually reinitiated accepting flyash. This site never reinitiated accepting flyash. The same order provided for a reduced post-closure-sampling-timeframe of five years. This is what has been completed at this site.

I realize that the future usage of the existing monitoring-well network at this site is optional and is totally up to the landowner's choice. I recommend that the site wells be kept in place and maintained during the 30-year, post-closure timeframe in which other similar sites (monofills in gravel pits) have a 30-year, post-closure sampling commitment. This is relative to future land usage and its possible changes. I believe the data could benefit the future owner(s), who would have the option of sampling the site wells to document continued compliance with groundwater quality standards. This data would continue to support the high land value, while plugging and abandoning these wells would simply eliminate any future ability to verify the groundwater quality. For what it is worth, the Solid Waste Statute (Part 115) has changed permanently from five years to 30 years post-closure sampling time frame to be more protective of the groundwaters of the State, even at flyash monofill sites.

I have enjoyed working with you and look forward to working with you in the future. I appreciate that you have taken a reasonable and pragmatic approach to this site since 1997, which has resulted in a greatly improved working relationship with the DEQ-Waste Management Division. If you have any questions regarding this letter, please contact me at the number listed below.

Sincerely,



Catherine E. Cline
Senior Hydrogeologist
Waste Management Division
616-775-3960, Extension 6202

cc: Mr. Phil Roycraft, DEQ-WMD, Cadillac
Mr. Scott Conradson, DEQ-WMD, Cadillac