

October 20, 2014

Ms. Sara Rasmussen or Chief: Cleanup Programs Branch  
U.S. Environmental Protection Agency  
Acting Chief, Cleanup Programs Branch  
Office of Resource Conservation and Recovery  
1200 Pennsylvania Avenue, NW (Mail-code 5303P)  
Washington, DC 20460  
Submitted via e-mail to: [Rasmussen.sara@epa.gov](mailto:Rasmussen.sara@epa.gov)

Subject: Notification of Disposal of PCB Remediation Waste  
Risk-Based Approval for USWAG Members  
Consumers Energy Western Avenue Substation  
1125 W. Western Avenue, Muskegon, Michigan 49441

Dear Ms. Rasmussen:

The letter serves as Consumers Energy's notification that we intend to dispose of non-liquid PCB Remediation Waste with as-found PCB concentrations less than 50 parts per million (ppm) into a non-TSCA approved landfill facility. This disposal is in accordance with the risk-based approval granted to members of the Utility Solid Waste Activities Group (USWAG), for waste generated at a secure utility asset location. This subject site is a secure location, which includes an operating substation. The following information is provided in accordance with the U.S. EPA's approval document, signed June 10, 2014:

- a. USWAG member name and address:**  
Consumers Energy Company, One Energy Plaza, Jackson, Michigan 49201
- b. EPA ID Number:**  
MID981802283
- c. Name and contact of primary USWAG member:**  
Mr. Patrick Zombo, 517-788-0647, [PATRICK.ZOMBO@cmsenergy.com](mailto:PATRICK.ZOMBO@cmsenergy.com)  
**Name and contact of primary USWAG record-keeping contact:**  
Same as above
- d. Site location:**  
1125 W. Western Avenue, City of Muskegon, Muskegon County, Michigan 49441
- e. Date waste was discovered:**  
First sample analyses received May 16, 2014.
- f. Size of area containing PCB Remediation Waste:**  
The area of PCB remediation waste being disposed pursuant to the subject approval is approximately 340 square feet (34 feet by 10 feet), and approximately 2 feet deep.

**g. Description of the PCB Remediation Waste:**

During demolition of an adjacent building, slightly stained soil was observed in the area of former transformers. The transformers had been removed years prior, so the original concentration of the transformer oil was not known. Initial sampling identified an as-found PCB concentration of 0.53 ppm. Subsequent sampling was conducted to determine the nature and extent of PCB impacted soils. A total of 15 additional soil samples were collected on approximately 3-meter grid spacing, along with three samples of concrete associated with the former transformer foundation. Twelve of the additional soil samples were “non-detect”, while the other three soil samples contained concentrations ranging from 0.34 to 0.63 ppm. Therefore, the maximum as-found PCB concentration in soil is 0.63 ppm, well below 50 ppm. PCBs were not detected in the concrete samples; however, the detection limit was 1 ppm. Therefore, due to minor staining and proximity to the soils impacted by PCBs at concentrations less than 1 ppm, the concrete is also being managed in accordance with the subject approval. The estimated volume of soil and concrete that will be disposed is 30 cubic yards and 10 cubic yards, respectively.

**h. Name, location, and type of disposal facility:**

The soil and concrete will be disposed at Waste Management’s Autumn Hills RDF, a Type II landfill located at 700 56<sup>th</sup> Avenue, Zeeland, Michigan 49464.

Written notice has been provided to the disposal facility stating that Consumers Energy will ship PCB Remediation Waste with as-found PCB concentrations less than 50 ppm. This notification, as well as other information, will be kept in accordance with the Record Keeping requirements of the subject disposal approval.

If you have any questions regarding the report, please contact Mr. Patrick Zombo (contact information above), or Brian Trent at (517) 788 – 2160.

Sincerely,

CONSUMERS ENERGY COMPANY

A handwritten signature in blue ink that reads "Brian S. Trent". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brian S. Trent, P.E.  
Environmental Services Department

cc: Ms. Molly Finn, USEPA, via e-mail at [finn.molly@epa.gov](mailto:finn.molly@epa.gov)  
PS Zombo, Consumers Energy (P22-116)  
DL Barber, Consumers Energy (Grand Rapids SC)