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Annual Inspection Report - 2025

For Compliance with the EPA Coal Combustion Residuals (CCR) Rule 40 CFR §257.83(b)

Former Erickson Power Station – Former Forebay, Former Retention Basin, and Former Clear Water Pond February 20, 2025

Prepared for: Lansing Board of Water & Light Former Erickson Power Station 3725 South Canal Road Lansing, Michigan 48917

Prepared by: HDR MICHIGAN, Inc. 1000 Oakbrook Drive, Suite 200 Ann Arbor, Michigan 48104



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1 Introduction and Purpose

HDR MICHIGAN, Inc. (HDR) has prepared this 2025 Annual Inspection Report for the Former Forebay, Former Retention Basin, and Former Clear Water Pond at the Former Erickson Power Station following the requirements of the Federal Coal Combustion Residuals (CCR) Rule to demonstrate compliance of the existing Former Erickson Power Station in Lansing, Michigan.

On April 17, 2015, the United States Environmental Protection Agency (EPA) issued the final rule (Ref. [1]) for disposal of Coal Combustion Residuals (CCR) under Subtitle D of the Resource Conservation and Recovery Act (RCRA). CCR Rule 40 CFR §257.73(b) requires that owners or operators of an existing CCR surface impoundment that either 1) has a height of five feet or more and a storage volume of 20 acre-feet or more; or 2) has a height of 20 feet or more perform periodic structural stability assessments (40 CFR §257.73(d)) and periodic safety factor assessments (40 CFR §257.73(e)). It was determined that the Former Forebay, Former Retention Basin, and Former Clear Water Pond at the Former Erickson Power Station meets the first criteria with a height of five feet or more and a storage volume greater than 20 acre-feet.

Additionally, CCR Rule 40 CFR §257.83(b)(1) states that if the existing CCR surface impoundment is subject to the periodic structural stability assessment requirements under 40 CFR §257.73(d), then the impoundment must additionally be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. This report presents the 2025 annual inspections for the Former Forebay, Former Retention Basin, and Former Clear Water Pond.

The Annual Inspection Report presented herein addresses the specific requirements of 40 CFR §257.83(b). The visual inspection site visit was conducted on February 3, 2025, by Bryce Burkett, P.E. of HDR and this Annual Inspection Report was prepared by Mr. Burkett. Mr. Burkett is a registered Professional Engineer in the State of Michigan.

1.1 Site Location

The Former Erickson Power Station is a former electrical power generation facility located at 3725 South Canal Road, Lansing, Michigan which is owned and operated by Lansing Board of Water & Light (BWL). The latitude and longitude of the Former Erickson Power Station are approximately 42.692422 N and 84.657764 W. The site is located southwest of Lansing Michigan, near the intersection of Interstates 69 and 96, as shown in the vicinity map, Figure 1.

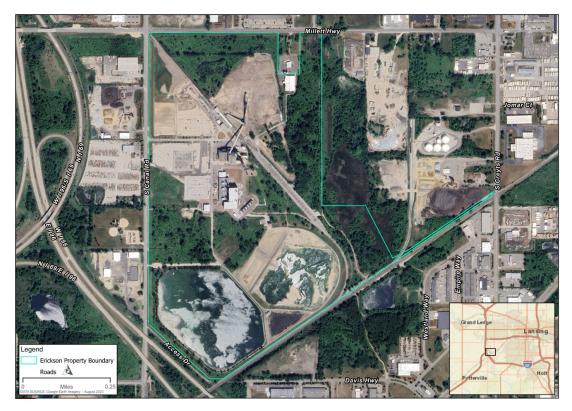


Figure 1. Former Erickson Power Station Site Vicinity Map

1.2 Site Description

During active operations, a single coal-fired generator was capable of producing 165 megawatts of electricity and CCR was stored in dewatering tanks (hydro-bins). After the majority of the CCR was removed from the waste stream at the hydro-bins, flow was discharged into the three former CCR impoundments in sequence: the Former Forebay, Former Retention Basin, and Former Clear Water Pond.

Erickson Power Station ceased coal-fired power generation operations on November 27, 2022. The plant pipelines were washed down and CCR waste ceased to the CCR impoundments on December 29, 2022. The non-CCR stormwater flow to the impoundments ceased January 3, 2023. A CCR removal contractor was selected and mobilized to the site in February 2023 to begin dewatering operations for the three impoundments. The water removed from the surface impoundments was treated onsite, monitored, and discharged into nearby Lake Delta in compliance with a NPDES permit. Ash and liner material was removed and transported offsite to Granger Wood Street Landfill from all three impoundments. Ash removal verification efforts for the Former Forebay, Former Retention Basin, and Former Clear Water Pond were completed and the removal activities are documented within the CCR Removal Report published for the site on November 4, 2024 and approved by EGLE on November 8, 2024.

Figure 2 presents the Former Erickson Power Station Facility Layout identifying the Former Forebay, Former Retention Basin, and Former Clear Water Pond. Also viewable in Figure 2 is the Lake Delta, the Former Impoundment, Former Coal Pile Area, and Former Erickson Power Station.

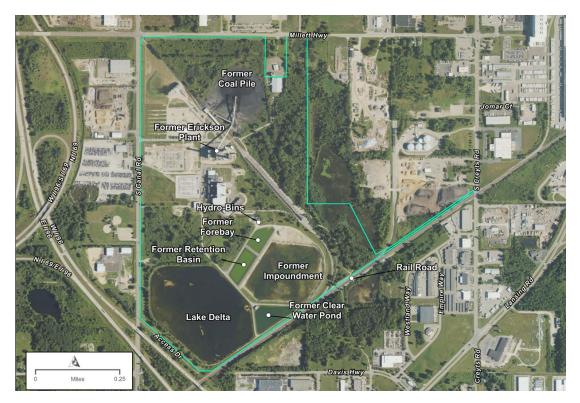


Figure 2. Former Erickson Power Station Facility Layout

1.3 Previous Assessments and Inspections

A dam assessment was performed previously for the Former Erickson Power Station Ash Pond, as summarized in the Round 10 Dam Assessment in GZA 2012 (Ref. [2]). GZA 2012 addressed the Ash Pond which ash was actively being removed at the time of the assessment. The Ash Pond has since been closed and is referred to herein as the Former Impoundment. GZA 2012 was conducted prior to the construction of the Former Forebay and Former Retention Basin.

HDR performed the Initial Inspections in accordance with CCR Rule 40 CFR §257.83(b) for the Former Forebay and Former Retention Basin (Ref. [4]), and Clear Water Pond (Ref. [3]) in 2020. Additionally, HDR performed the 2021 Annual Inspection (Ref. [5]), the 2022 Annual Inspection (Ref. [6]), the 2023 Annual Inspection (Ref. [7]), and the 2024 Annual Inspection (Ref. [8]).

Weekly inspections are performed for the CCR impoundment system by qualified individuals to check for potentially hazardous conditions or structural weakness.

There have been no reports of structural instability at the Former Forebay, Former Retention Basin, or Former Clear Water Pond during previous inspections, except for minor sloughing at the Clear Water Pond which was documented in previous inspections.

2 Visual Inspection - 40 CFR §257.83(b)

The requirements to be documented in the Inspection Report for existing CCR surface impoundments are detailed in 40 CFR §257.83(b): Annual inspections by a qualified

professional engineer. CCR Rule 40 CFR §257.83(b)(2) states that the inspection report must address the following items:

§257.83 (b)(2)(i): Any changes in geometry of the impounding structure since the previous annual inspection.

§257.83 (b)(2)(ii): The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.

§257.83 (b)(2)(iii): The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.

§257.83 (b)(2)(iv): The storage capacity of the impounding structure at the time of the inspection.

§257.83 (b)(2)(v): The approximate volume of the impounded water and CCR at the time of the inspection.

§257.83 (b)(2)(vi): Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures.

§257.83 (b)(2)(vii): Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

The visual inspection site visit was conducted on February 3, 2025, by Bryce Burkett, P.E. of HDR. The weather on February 2 was clear with temperatures between 30 and 38 degrees. Rainfall had not occurred within the 24 hours prior to the inspection.

2.1 Former Forebay and Former Retention Basin

The CCR in the Former Forebay and Former Retention Basin has been removed, and the impoundments are closed as discussed in Section 1.2. The storage capacity of the Former Forebay was 933,000 cubic feet at approximate top of dike El. 884 NAVD 88 and the storage capacity of the Former Retention Basin was 1,298,000 cubic feet at approximate top of dike El. 885 NAVD 88.

The visual inspection was conducted in accordance with the CCR Final Rule to identify signs of distress or malfunction of the CCR unit and appurtenant structures and consisted of observations of features and conditions readily discernible by external visual inspection through reasonable efforts. Inspection Checklist Forms are provided in Appendix A. A discussion of the embankment conditions is presented in the following subsections and the terminology describing the embankment sections is shown in Figure 3.



Figure 3. Former Forebay and Former Retention Basin Embankment Terminology

2.1.1 Southeast Embankment

The Southeast Embankment separates the Former Forebay and Former Retention Basin to the northwest and the Former Impoundment to the southeast. As previously stated, all impoundments at the site are closed and CCR has been removed. The Southeast Embankment appeared to be in good condition and no evidence of movement, settlement,

cracking, distress, seepage, animal burrows or other adverse conditions was observed in the crest and upstream and downstream slopes.

Notes:

- The crest of the embankment consisted of a gravelly/soil surface which was in good condition.
- The rip-rap protecting the interior slope has been removed. The rip-rap on the exterior slope appears to be in good condition.
- No vegetation is currently present.
- Erosion is present on the interior embankment where CCR removal occurred and no vegetation is present. This condition is temporary as the Former Forebay and Former Retention Basin will be filled with soil now that the CCR removal is complete.

2.1.2 Northeast Embankment

The Northeast Embankment separates the Former Forebay to the southwest and the Hydro-Bins and grassy areas to the north. The Northeast Embankment appeared to be in good condition, and no evidence of movement, settlement, cracking, distress, seepage, animal burrows or other adverse conditions was observed.

Notes:

- The crest of the embankment consisted of a gravelly/soil surface which was in good condition.
- The rip-rap protecting the interior slope has been removed.
- No vegetation is currently present.
- Erosion is present on the interior embankment where CCR removal occurred and no vegetation is present. This condition is temporary as the Former Forebay will be filled with soil now that the CCR removal is complete.

2.1.3 Northwest Embankment

The Northwest Embankment separates the Former Forebay and Former Retention Basin to the southeast and wooded areas to the northwest. The Northwest Embankment appeared to be in good condition, and no evidence of movement, settlement, cracking, distress, seepage, animal burrows or other adverse conditions was observed in the crest and upstream and downstream slopes.

Notes:

- The crest of the embankment consisted of a gravelly/soil surface which was in good condition.
- The rip-rap protecting the interior slope has been removed.
- No vegetation is currently present.



 Erosion is present on the interior embankment where CCR removal occurred and no vegetation is present. This condition is temporary as the Former Forebay and Former Retention Basin will be filled with soil now that the CCR removal is complete.

2.1.4 Southwest Embankment

The Southwest Embankment separates the Former Retention Basin to the northeast and Lake Delta to the southwest. The Southwest Embankment appeared to be in good condition, and no evidence of movement, settlement, cracking, distress, seepage, animal burrows or other adverse conditions was observed in the crest and upstream and downstream slopes.

Notes:

- The rip-rap protecting the interior slope has been removed and vegetation covers
 the exterior slope (adjacent to Lake Delta). The crest of the embankment
 consisted of a gravelly/soil surface. The crest and slopes appeared to be in good
 condition.
- No vegetation is currently present.
- Erosion is present on the interior embankment where CCR removal occurred and no vegetation is present. This condition is temporary as the Former Retention Basin will be filled with soil now that the CCR removal is complete.

2.1.5 Intake/Outlet Structures

Former Forebay Influent Pipes

The Former Forebay Influent Pipes, located at the northeast corner of the Former Forebay, have been decommissioned and capped in place. There was no evidence of settlement, sinkholes, or cracking in the area above the pipes extending through the Northeast Embankment.

Former Forebay Overflow

The Former Forebay Overflow pipes were removed during the CCR removal.

Former Impoundment Overflow

The Former Impoundment Overflow is still in place, however, no longer in use and will be removed in 2025. The pipe consists of 24-inch CPP. There was no evidence of settlement, sinkholes, or cracking in the area above the Former Impoundment Overflow extending through the Southeast Embankment.

Former Retention Basin Overflow Structure

The Former Retention Basin Overflow Structure is still in place, however, the structure is inactive and has been cleaned internally as part of the impoundment decommissioning activities. Additionally, the Former Retention Basin Overflow Structure will be removed in 2025. The structure appears to be in good condition. There was no evidence of settlement, sinkholes, or cracking in the area above the pipe extending through the Southeast embankment.

By-Pass Pipe

The by-pass pipe has been decommissioned and capped in place. There was no evidence of settlement, sinkholes, or cracking in the area of the embankment above the pipe extending through the Southwest Embankment.

Inspection of Submerged Structures

The CCR Final Rule requires that the annual inspection include a visual inspection of hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation. The structures have been decommissioned and the impoundments are closed. The list of hydraulic structures that have been removed or are scheduled to be removed, or decommissioned, at the Former Forebay and Former Retention Basin include the following:

- Former Forebay Influent Pipes
- Former Forebay Overflow
- Former Impoundment Overflow
- Former Retention Basin Overflow Structure
- By-Pass Pipe

2.1.6 Instrumentation

As part of the hydrogeologic characterization study for the Former Erickson Power Station, HDR installed several monitoring wells across the site to develop a groundwater monitoring network in 2019 through 2023 (Ref. [9]). Two of these monitoring wells (MW-3 and MW-4) were installed in the vicinity of the Former Forebay and Former Retention Basin as shown in Figure 4. Additionally, two temporary monitoring wells were installed adjacent to the Former Retention Basin as part of the ongoing dewatering and CCR removal efforts to monitor the piezometric conditions of the Southwest Embankment. These two temporary monitoring wells will be abandoned in 2025. The monitoring wells consist of 2-inch, Sch. 40 PVC risers. The monitoring well screen consists of 0.010-inch slots and is surrounded by a silica sand filter pack. Table 2-1 provides details for the four monitoring wells installed in the vicinity of the Former Forebay and Former Retention Basin.



Figure 4. Monitoring Well Locations - Former Forebay and Former Retention Basin

Table 2-1. Monitoring Well Details – Former Forebay and Former Retention Basin

Well	Elevation (TOC) (feet NAVD 88)	Well Stickup (feet)	Total Depth (feet)	Depth of Screen (feet)	Max. Static Water Elevation ¹ (feet NAVD 88)
MW-3	884.81	-0.31	34	24-34	870.52
MW-4	889.15	3.92	28	18-28	871.78
RB-1	886.69	0.48	20	12-17	2
RB-2	889.85	3.47	17	10-20	2

^{1.} Maximum level since previous inspection.

No other instrumentation is present at the Former Forebay and Former Retention Basin.

2.2 Former Clear Water Pond

The CCR in the Former Clear Water Pond has been removed and the impoundment is closed as discussed in Section 1.2. The approximate storage capacity of the Former Clear Water Pond was 1,843,000 cubic feet.

^{2.} MWs not read since previous inspection.

The visual inspection was conducted in accordance with the CCR Final Rule to identify signs of distress or malfunction of the CCR unit and appurtenant structures and consisted of observations of features and conditions readily discernible by external visual inspection through reasonable efforts. The Inspection Checklist Form is provided in Appendix A. A discussion of the embankment conditions is presented in the following subsections and the terminology describing the embankment sections is shown in Figure 5.



Figure 5. Former Clear Water Pond Embankment Terminology

2.2.1 Southeast Embankment

The Southeast Embankment separates the Former Clear Water Pond to the northwest and the swale and railroad to the southeast. The Southeast Embankment appeared to be in good condition and no evidence of movement, settlement, cracking, distress, seepage, animal burrows or other adverse conditions was observed in the crest and upstream and downstream slopes.

Notes:

- This embankment has been temporarily restricted of vehicle traffic as a portion of the interior crest has been removed during impoundment decommissioning activities. The interior embankment is currently being resurfaced to reopen the embankment for vehicle traffic
- The crest of the embankment consisted of a gravelly/soil surface. Minor rutting of the crest was observed.
- Riprap protecting the interior slope has been removed.



- Vegetation has been removed from the interior slope and the vegetation appears
 to have been maintained properly on the exterior slope of the embankment and
 at the exterior toe in the swale.
- Erosion is present on the interior embankment where CCR removal occurred and no vegetation is present. This condition is temporary and this embankment will be reseeded.

2.2.2 North Embankment

The North Embankment separated the Former Clear Water Pond to the south and the Former Impoundment to the north. As previously stated, all impoundments at the site are closed and CCR has been removed. The North Embankment has been removed at the time of this inspection.

2.2.3 West Embankment

The West Embankment separates the Former Clear Water Pond to the east and Lake Delta to the west. The West Embankment appeared to be in good condition and no evidence of movement, settlement, cracking, distress, seepage, animal burrows or other adverse conditions was observed in the crest and upstream and downstream slopes.

Notes:

- Vegetation has been removed from the interior slope and the vegetation appears to have been maintained properly on the exterior slope.
- The crest of the embankment consisted of a gravelly/soil. No evidence of movement, settlement, cracking, or other distress was observed in the crest.
- Erosion is present on the interior embankment where CCR removal has occurred and no vegetation is present. This condition is temporary and this embankment will be reseeded.

2.2.4 Intake/Outlet Structures

Lake Delta Drainage Structure

The Lake Delta Drainage Structure, located between the Former Clear Water Pond and Lake Delta, appeared to be in good condition. The concrete and walkway appeared to be in good condition. The pipe of the Lake Delta Drainage Structure is underground and could not be observed during the visual inspection. There was no evidence of settlement, sinkholes, or cracking in the area of the embankment above the pipe extending through the Former Clear Water Pond embankment.

Lake Delta Transfer Structure

The Lake Delta Transfer Structure, located between the Former Clear Water Pond and Lake Delta, appeared to be in good condition. The pipe of the Lake Delta Transfer Structure is visible due to dewatering the Former Clear Water Pond and appears to be in good condition. There was no evidence of settlement, sinkholes, or cracking in the area of the embankment above the pipe extending through the Former Clear Water Pond

embankment. The Lake Delta Transfer Structure has not been used since 2017 and will be abandoned in place in 2025.

Old Ash Impoundment Transfer Structure

The Old Ash Impoundment Transfer Structure, located between the Former Clear Water Pond and the Former Impoundment, is still in place and is undergoing removal at the time of this inspection. The concrete of the structures appeared to be in good condition. The piping of the Old Ash Impoundment Transfer Structure had been removed at the time of this inspection.

Old Ash Impoundment Drainage Structure

The Old Ash Impoundment Drainage Structure, located between the Former Clear Water Pond and the Former Impoundment, is inactive and not in use. According to BWL, the pipe valve is currently closed. The concrete of the structure appeared to be in good condition. The pipe of the Old Ash Impoundment Drainage Structure is underground and could not be observed during the visual inspection. There was no evidence of settlement, sinkholes, or cracking in the area of the embankment above the pipe extending through the Former Clear Water Pond embankment.

Emergency Overflow Structure

The Emergency Overflow Structure, located between the Former Clear Water Pond and the swale and railroad ROW, appeared to be in good condition. The outlet pipe appeared in good condition and no leaking, sediment, or flow of water was observed. There was no evidence of settlement, sinkholes, or cracking in the area of the embankment above the pipe extending through the Former Clear Water Pond embankment.

The outlet pipe is equipped with fencing to prevent animals from entering and vegetation was maintained around the outlet.

Grand River Discharge Pipe to Lake Delta

According to BWL, a pipe is present near the northern edge of the West Embankment of the Former Clear Water Pond. BWL withdraws water directly from the Grand River into Lake Delta for cooling water operations at Delta Energy Park. BWL states that this pipe is active however does not extend through the Former Clear Water Pond embankment as it is located underground northwest of the Pump House. The pipe is currently closed at the time of this report. HDR is unaware of the size, material, and alignment of this pipe.

Inspection of Submerged Structures

The CCR Final Rule requires that the annual inspection include a visual inspection of hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation. The structures have been decommissioned. The list of hydraulic structures that have been removed or are scheduled to be removed, or decommissioned, at the Former Clear Water Pond include the following:

- Lake Delta Transfer Structure
- Old Ash Impoundment Transfer Structure



ROV inspections will not be performed for the hydraulic structures remaining at the site as the impoundment is closed. The following hydraulic structures will remain in place, but are no longer in use as the impoundment ceased operation in 2023:

- Lake Delta Drainage Structure
- Former Clear Water Pond Emergency Overflow Structure
- Old Ash Impoundment Drainage Structure
- Grand River Discharge Pipe to Lake Delta

2.2.5 Instrumentation

As part of the hydrogeologic characterization study for the Former Erickson Power Station, HDR installed several monitoring wells across the site to develop a groundwater monitoring network in 2019 through 2023 (Ref. [9]). Two of these monitoring wells (MW-1 and MW-14) were installed in the vicinity of the Former Clear Water Pond as shown in Figure 6. The monitoring wells consist of 2-inch, Sch. 40 PVC risers. The monitoring well screen consists of 0.010-inch slots and is surrounded by a silica sand filter pack. Table 2-2 provides details for the two monitoring wells installed in the vicinity of the Former Clear Water Pond.



Figure 6. Monitoring Well Locations – Former Clear Water Pond

Table 2-2. Monitoring Well Details - Former Clear Water Pond

Well	Elevation (TOC) (feet NAVD 88)	Well Stickup (feet)	Total Depth (feet)	Depth of Screen (feet)	Max. Static Water Elevation ¹ (feet NAVD 88)	
MW-1	888.74	2.79	30	20-30	873.88	
MW-14	884.59	-0.43	28	18-28	869.24	
4. Martinum laud aine martinum increation						

1. Maximum level since previous inspection.

Other instrumentation consisted of gauge boards at the Pump House and the Lake Delta Drainage Structure. The gauge attached to the Pump House at the Former Clear Water Pond has been removed.



Closure 3

Based on the information provided to HDR by BWL, information available on BWL's CCR website, and HDR's visual observations and analyses, this 2025 Annual Inspection was conducted in accordance with the requirements of the USEPA 40 CFR Parts 257 and 261 Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, April 17, 2015 (CCR Final Rule). Based on the information currently available, I certify to the best of my knowledge, information and belief that this Annual Inspection of the Former Forebay, Former Retention Basin, and Former Clear Water Pond meets the requirements of CCR Rule §257.83(b) in accordance with professional standards of care for similar work. HDR appreciates the opportunity to assist BWL with this project. Please contact us if you have any questions or comments.

Bryce Burkett, P.E.

Byce But

Senior Geotechnical Project Manager

BRYCE LICENSED BURKETT **ENGINEER** No. 6201066757 POFESS IONA

20 Feb 2025

References 4

- Ref. [1] Environmental Protection Agency, 40 CFR Parts 257 and 261; Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, Washington D.C., April 2015.
- GZA GeoEnvironmental, Inc. Draft Round 10 Dam Assessment Report, Lansing Ref. [2] Board of Water & Light, Erickson Power Station, Ash Pond. April 30, 2012.
- Ref. [3] HDR Engineering, Inc. Initial Inspection Report - Clear Water Pond, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, June 12, 2020.
- Ref. [4] HDR Engineering, Inc. Initial Inspection Report – Forebay and Retention Basin, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, August 10, 2020.
- Ref. [5] HDR Engineering, Inc. Annual Inspection Report - 2021 - Forebay, Retention Basin, and Clear Water Pond, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, April 27, 2022.
- Ref. [6] HDR Engineering, Inc. Annual Inspection Report - 2022 – Forebay, Retention Basin, and Clear Water Pond, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, May 2, 2022.
- HDR Engineering, Inc. Annual Inspection Report 2023 Forebay, Retention Basin, Ref. [7] and Clear Water Pond, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, February 24, 2023.
- Ref. [8] HDR Engineering, Inc. Annual Inspection Report - 2024 – Forebay, Retention Basin, and Clear Water Pond, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, February 21, 2024.
- Ref. [9] HDR Engineering, Inc. Monitoring Well Installation Report, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, March 25, 2020, Updated October 24, 2023.
- Mayotte Design & Engineering, P.C. Construction Documentation Report Ash Ref. [10] Impoundment System Reconfiguration, Lansing Board of Water & Light Erickson Power Station, Lansing, Michigan, May 2015.

5 **Appendices**

Appendix A Inspection Checklists

APPENDIX AINSPECTION CHECKLISTS

US Environmental Protection Agency



Site Name: Erickson Power Station	Date: February 3, 2025
Unit Name: Forebay	Operator's Name: Lansing Board of Water and Light
Unit I.D.: N/A	Hazard Potential Classification: нідh significant Low
Inspector's Name: Bryce Burkett, P.E.	

Check the appropriate box below. Provide comments when appropriate. If not applicable or not available, record "N/A". Any unusual conditions or construction practices that should be noted in the comments section. For large diked embankments, separate checklists may be used for different embankment areas. If separate forms are used, identify approximate area that the form applies to in comments.

	Yes	No		Yes	No
Frequency of Company's Dam Inspections?	We	eekly	18. Sloughing or bulging on slopes?		X
2. Pool elevation (operator records)?	N	I/A	19. Major erosion or slope deterioration?		X
3. Decant inlet elevation (operator records)?	N	I/A	20. Decant Pipes:		
4. Open channel spillway elevation (operator records)?	N	J/A	Is water entering inlet, but not exiting outlet?		X
5. Lowest dam crest elevation (operator records)?	884	4.0 ft	Is water exiting outlet, but not entering inlet?		X
6. If instrumentation is present, are readings recorded (operator records)?	X		Is water exiting outlet flowing clear?		X
7. Is the embankment currently under construction?	X		21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):		
8. Foundation preparation (remove vegetation, stumps, topsoil in area where embankment fill will be placed)?		J/A	From underdrain?		X
Trees growing on embankment? (If so, indicate largest diameter below)		X	At isolated points on embankment slopes?		X
10. Cracks or scarps on crest?	<u> </u>	X	At natural hillside in the embankment area?		X
11. Is there significant settlement along the crest?		X	Over widespread areas?		X
12. Are decant trash racks clear and in place?	N	J/A	From downstream foundation area?		X
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?		X	"Boils" beneath stream or ponded water?		X
14. Clogged spillways, groin or diversion ditches?		X	Around the outside of the decant pipe?		X
15. Are spillway or ditch linings deteriorated?	N	J/A	22. Surface movements in valley bottom or on hillside?	<u> </u>	X
16. Are outlets of decant or underdrains blocked?		X	23. Water against downstream toe?		X
17. Cracks or scarps on slopes?		X	24. Were Photos taken during the dam inspection?	X	

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue

Comments

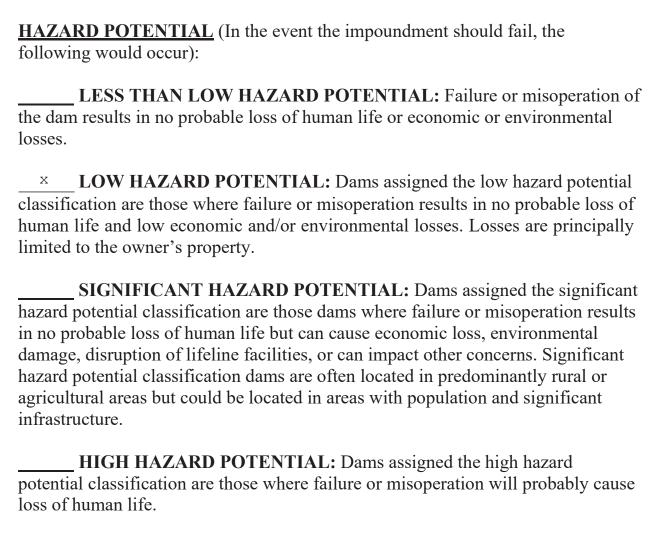
- 1. Weekly inspection performed by BWL of CCR Impoundment System.
- 5. Elevation obtained from MD&E Construction Documentation Report.
- 6. Monitoring well readings (MW-3 and MW-4) collected by HDR.
- 23. Water is on the downstream toe for the embankment bordering Former Impoundment.

U. S. Environmental Protection Agency



Coal Combustion Waste (CCW) Impoundment Inspection

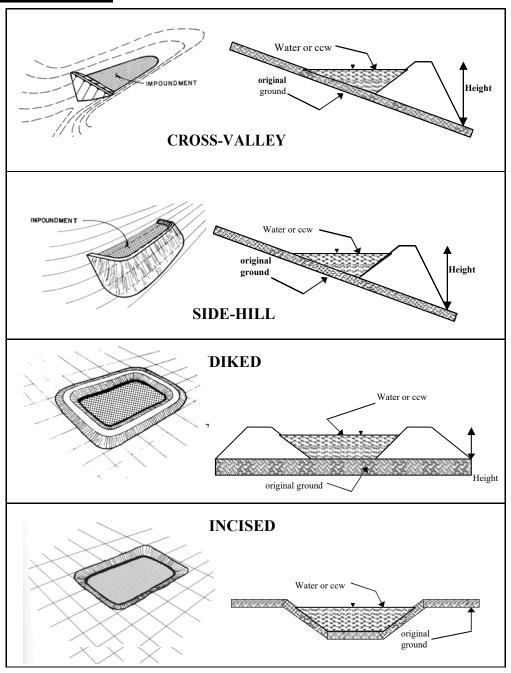
Impoundment NI	PDES Permit# N/A			INSPECT	OK <u>B</u>	<u> Bryce Burkett, P.E.</u>
Date <u>February</u>	3, 2025					
Impoundment N	Name: Erickson Power	Station – Foreb	oay			
Impoundment (Company Lansing Bo	oard of Water a	nd Ligh	t		
EPA Region N/	'A					
State Agency (I	Field Office) Addres	ss N/A				
	,					
Name of Impou	ndment Erickson	n Power Station	n – Fore	bay		
(Report each in	npoundment on a se	parate form	under	the same I	mpou	indment NPDES
Permit number) ()	L			1	
	,					
New	Update X					
	•	•				
				Yes		No
Is impoundmen	t currently under co	nstruction?				
Is water or ccw	currently being pur	nped into			-	
the impoundme	• • •	•				X
•					_	
IMPOUNDME	NT FUNCTION: U	Jndergoing (closur	e		
Nearest Downs	tream Town: Nar	ne: Dimondale	e			
Distance from t	he impoundment: 1.	.05 miles				
Impoundment						
Location:	Longitude 84	Degrees	39	_Minutes _	19	Seconds
	Latitude <u>42</u>	Degrees	41	_Minutes _	20	Seconds
	State MI	County	Ear	ton		
Does a state ago	ency regulate this in	npoundment	t? YE	S N	10	X
8	, ,	1				
If So. Which St	ate Agency? N/A					



DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

Embankment failure would be limited primarily to owner's property with no probable loss of human life and low economic/environmental losses.

CONFIGURATION:



Cross-Valley			
Side-Hill			
<u>x</u> Diked			
Incised (form cor	npletion optio	nal)	
Combination I	ncised/Dil	ked	
Embankment Height	13	feet	Embankment Material Compacted Clay
Pool Area	<u>=</u>	acres	Liner geosynthetic clay (GCL) and 40 millimeter-thick FML
Current Freeboard	feet		Liner Permeability unknown

TYPE OF OUTLET (Mark all that apply)

N/A	Open Channel Spillway	TRAPEZOIDAL	TRIANGULAR
	Trapezoidal	Top Width	Top Width
	_ Triangular		
	Rectangular	Depth	Depth
	_Irregular	Bottom Width	
	_ depth	RECTANGULAR	IRREGULAR
	_ bottom (or average) width _ top width		Average Width Avg
	_ top width -	Depth Width	Depth
	_ Outlets		
	_ inside diameter		
Mater	rial		Inside Diameter
	_ corrugated metal		
	_ welded steel	\	
	_ concrete		
	_ plastic (hdpe, pvc, etc.) _ other (specify)		
	_		
Is wa	ter flowing through the outlet	? YES	NO
X	_ No Outlet		
	Other Type of Outlet (spec	eify)	
The I	mpoundment was Designed E	By: <u>Mayotte Design</u> 6	& Engineering, P.C.

Has there ever been a failure at this site? YES	NO _	X
If So When?		
If So Please Describe :		

Has there ever been significant seepages at this site?	YES	NO _	X
If So When?			
IF So Please Describe:			

Phreatic water table levels based on past seepages or breaches at this site? YESN					
	1110	1101			
If so, which method (e.g., piezome	eters, gw pumping,)?				
If so Please Describe:					
ii so i lease Describe .					

US Environmental Protection Agency



Site Name: Erickson Power Station	Date: February 3, 2025
Unit Name: Retention Basin	Operator's Name: Lansing Board of Water and Light
Unit I.D.: N/A	Hazard Potential Classification: High Significant Low
Inspector's Name: Bryce Burkett, P.E.	

Check the appropriate box below. Provide comments when appropriate. If not applicable or not available, record "N/A". Any unusual conditions or construction practices that should be noted in the comments section. For large diked embankments, separate checklists may be used for different embankment areas. If separate forms are used, identify approximate area that the form applies to in comments.

	Yes	No		Yes	No
Frequency of Company's Dam Inspections?	We	ekly	18. Sloughing or bulging on slopes?		X
2. Pool elevation (operator records)?	N	//A	19. Major erosion or slope deterioration?		X
3. Decant inlet elevation (operator records)?	N	//A	20. Decant Pipes:		
4. Open channel spillway elevation (operator records)?	N	//A	Is water entering inlet, but not exiting outlet?		X
5. Lowest dam crest elevation (operator records)?	885	5.0 ft	Is water exiting outlet, but not entering inlet?		X
6. If instrumentation is present, are readings recorded (operator records)?	X		Is water exiting outlet flowing clear?		X
7. Is the embankment currently under construction?	X		21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):		
8. Foundation preparation (remove vegetation, stumps, topsoil in area where embankment fill will be placed)?	N	/A	From underdrain?		X
Trees growing on embankment? (If so, indicate largest diameter below)		X	At isolated points on embankment slopes?		X
10. Cracks or scarps on crest?		X	At natural hillside in the embankment area?		X
11. Is there significant settlement along the crest?		X	Over widespread areas?		X
12. Are decant trash racks clear and in place?	N	//A	From downstream foundation area?		X
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?		X	"Boils" beneath stream or ponded water?		X
14. Clogged spillways, groin or diversion ditches?		X	Around the outside of the decant pipe?		X
15. Are spillway or ditch linings deteriorated?	N	/A	22. Surface movements in valley bottom or on hillside?		X
16. Are outlets of decant or underdrains blocked?		X	23. Water against downstream toe?	X	
17. Cracks or scarps on slopes?		X	24. Were Photos taken during the dam inspection?	X	

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue

Comments

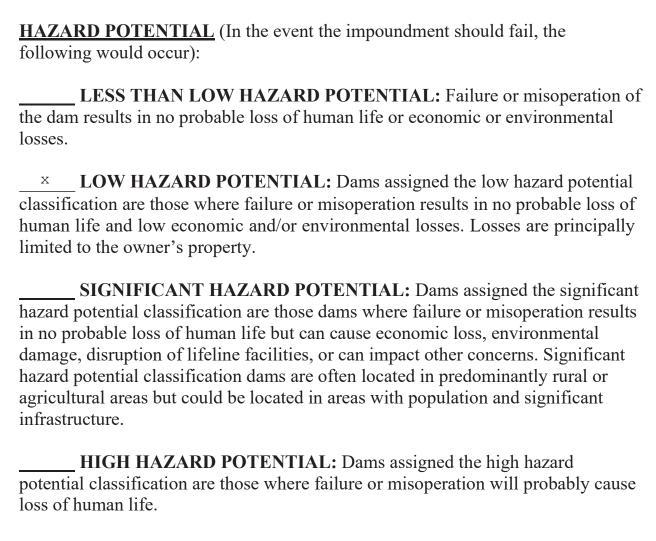
- 1. Weekly inspection performed by BWL of CCR Impoundment System.
- 5. Elevation obtained from MD&E Construction Documentation Report.
- 6. Monitoring well readings (MW-3 and MW-4) collected by HDR.
- 23. Water is on the downstream toe for the embankment bordering Lake Delta.

U. S. Environmental Protection Agency



Coal Combustion Waste (CCW) Impoundment Inspection

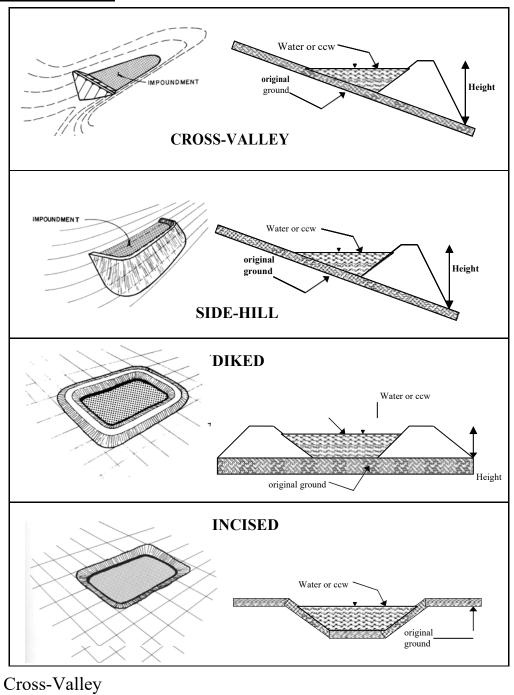
Date February 3, 2025	
Impoundment Name: Erickson Power Station – Retention Basi	in
Impoundment Company Lansing Board of Water and Light_	
EPA Region N/A State Agency (Field Office) Address N/A	
State Agency (Field Office) Address 1VA	
Name of Impoundment Erickson Power Station – Reten	tion Basin
(Report each impoundment on a separate form under the Permit number)	the same Impoundment NPDES
NewUpdate X	
Is impoundment currently under construction? Is water or ccw currently being pumped into	Yes No
the impoundment?	X
IMPOUNDMENT FUNCTION: Undergoing closure	<u>; </u>
Nearest Downstream Town: Name: Dimondale Distance from the impoundment: 1.05 miles Impoundment	
_	_Minutes16Seconds
Latitude 42 Degrees 41	
State_MICountyEato	on
Does a state agency regulate this impoundment? YES	S NO x
If So, Which State Agency? N/A	



DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

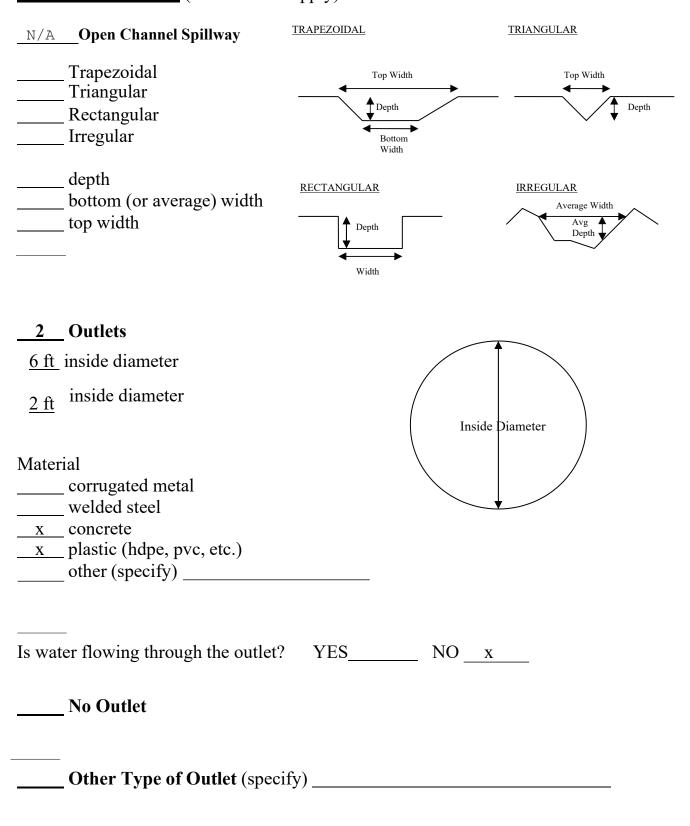
Embankment failure would be limited primarily to owner's property with no probable loss of human life and low economic/environmental losses.

CONFIGURATION:



Side-Hill	
<u>×</u> Diked	
Incised (form completion optional)	
Combination Incised/Diked	
Embankment Height14feet	Embankment Material Compacted Clay
Pool Area <u></u> acres	Liner geosynthetic clay (GCL) and 40 millimeter-thick FML
Current Freeboard feet	Liner Permeability unknown

TYPE OF OUTLET (Mark all that apply)



The Impoundment was Designed By: Mayotte Design & Engineering, P.C.

4

Has there ever been a failure at this site? YES	NO _	X
If So When?		
If So Please Describe :		

Has there ever been significant seepages at this site?	YES	NOx
If So When?		
IF So Please Describe:		
		-
		_
		_
		-

Has there ever been any measures undertaken to monitor/lower Phreatic water table levels based on past seepages or breaches					
at this site?		YES	NO	X	
If so, which method (e.g., piezometer	rs, gw pumping,.)?			
If so Please Describe:					
II SO Flease Describe.					

US Environmental Protection Agency



Site Name: Erickson Power Station	Date: February 3, 2025
Unit Name: Clear Water Pond	Operator's Name: Lansing Board of Water and Light
Unit I.D.: N/A	Hazard Potential Classification: нідh significant Low
Inspector's Name: Bryce Burkett, P.E.	

Check the appropriate box below. Provide comments when appropriate. If not applicable or not available, record "N/A". Any unusual conditions or construction practices that should be noted in the comments section. For large diked embankments, separate checklists may be used for different embankment areas. If separate forms are used, identify approximate area that the form applies to in comments.

	Yes	No		Yes	No
Frequency of Company's Dam Inspections?	We	ekly	18. Sloughing or bulging on slopes?		X
Pool elevation (operator records)?	N	//A	19. Major erosion or slope deterioration?		X
3. Decant inlet elevation (operator records)?	N	//A	20. Decant Pipes:		
4. Open channel spillway elevation (operator records)?	N	//A	Is water entering inlet, but not exiting outlet?		X
5. Lowest dam crest elevation (operator records)?	N	//A	Is water exiting outlet, but not entering inlet?		X
6. If instrumentation is present, are readings recorded (operator records)?	X		Is water exiting outlet flowing clear?		X
7. Is the embankment currently under construction?	X		21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):		
8. Foundation preparation (remove vegetation, stumps, topsoil in area where embankment fill will be placed)?	N	/A	From underdrain?		X
Trees growing on embankment? (If so, indicate largest diameter below)		X	At isolated points on embankment slopes?		X
10. Cracks or scarps on crest?		X	At natural hillside in the embankment area?		X
11. Is there significant settlement along the crest?		X	Over widespread areas?		X
12. Are decant trash racks clear and in place?	N	//A	From downstream foundation area?		X
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?		X	"Boils" beneath stream or ponded water?		X
14. Clogged spillways, groin or diversion ditches?		X	Around the outside of the decant pipe?		X
15. Are spillway or ditch linings deteriorated?	N	//A	22. Surface movements in valley bottom or on hillside?		X
16. Are outlets of decant or underdrains blocked?	N	//A	23. Water against downstream toe?	X	
17. Cracks or scarps on slopes?		X	24. Were Photos taken during the dam inspection?	X	

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue

Comments

- 1. Weekly inspection performed by BWL of CCR Impoundment System.
- 5. The North Embankment was removed in 2025.
- 6. Monitoring well readings (MW-1 and MW-14) collected by HDR.
- 23. Water is on the downstream toe for the embankment bordering Lake Delta.

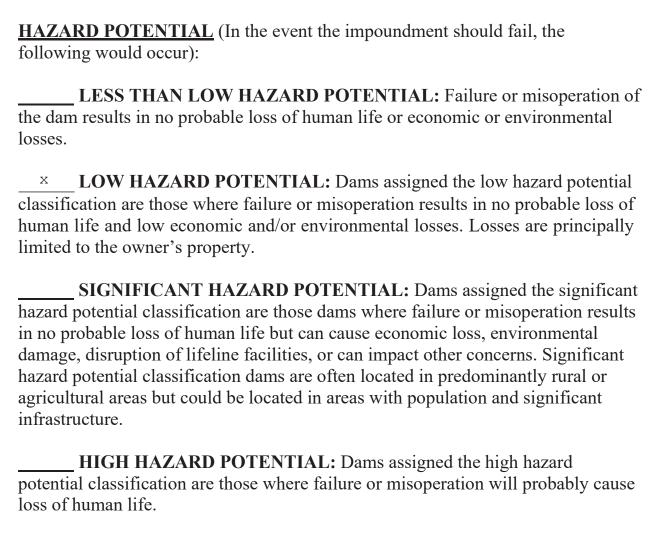
EPA FORM -XXXX

U. S. Environmental Protection Agency



Coal Combustion Waste (CCW) Impoundment Inspection

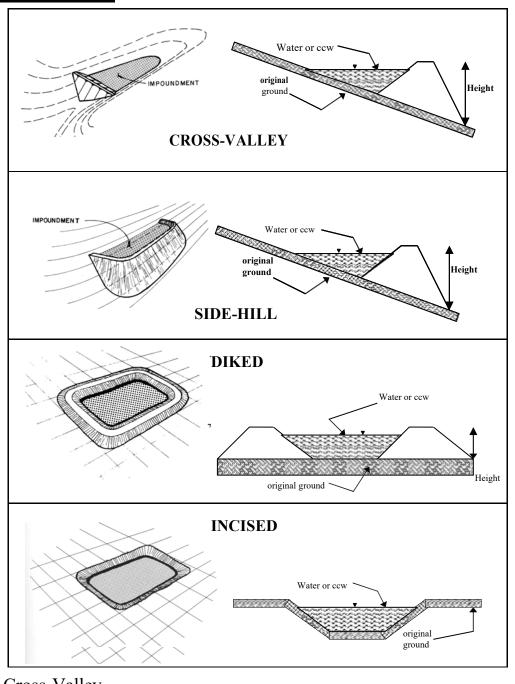
Impoundment NI	PDES Permit# N/A			INSPECT	OR <u> B</u>	ryce Burkett, P.E.
Date February	3, 2025					
Impoundment N	Name: Erickson Powe	er Station – Clear	Water 1	Pond		
Impoundment (Company Lansing I	Board of Water a	nd Ligh	t		
EPA Region N/	'A					
State Agency (I	Field Office) Addr	ess N/A				
Name of Impou	ndment Ericks	on Power Station	n – Clea	r Water Pond		
(Report each in	npoundment on a s	separate form	under	the same Ir	npou	ndment NPDES
Permit number						
New	Update X	<u></u>				
				Yes		No
•	t currently under o			X	_	
	currently being pu	amped into				
the impoundme	nt?				;	X
		TT 1 .	1			
IMPOUNDME	NT FUNCTION:_	Undergoing of	closur	<u>e</u>		
N (D	, T NI					
Nearest Downs	tream Town: Na	ame: Dimondale	<u> </u>			
Distance from t	he impoundment:	1.05 miles			_	
Impoundment	Lanaituda	Dagmaga	20	Minutag	17	Casanda
Location.	Longitude 8					
	Latitude	_				
	State MI	County	Ea	ton		
_						
Does a state age	ency regulate this i	impoundment	t? YE	S N	[O _	X
If So. Which St	ate Agency? N/A	Δ				



DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

Embankment failure would be limited primarily to owner's property with no probable loss of human life and low economic/environmental losses.

CONFIGURATION:



TYPE OF OUTLET (Mark all that apply)

N/A	Open Channel Spillway	TRAPEZOIDAL	TRIANGULAR
	Trapezoidal	Top Width	Top Width
	_ Triangular	A _D , d	
	_ Rectangular	Depth	Depth
	_ Irregular	Bottom Width	
	_ depth	<u>RECTANGULAR</u>	<u>IRREGULAR</u>
	_ bottom (or average) width	RECTRIVOLINE	Average Width
	_top width	Depth	Avg Depth
	_	Width	Bepar
X	Outlet		
2.0	inside diameter		
3 ft	_		
Mater		Ins	side Diameter
	_ corrugated metal		
	_ welded steel		
	_ concrete		
X	_ plastic (hdpe, pvc, etc.)		
	other (specify) Ductile iron		
Is wat	ter flowing through the outlet:	? YES NO _	X
	No Outlet		
	Other Type of Outlet (spec	ify)	
The I	mpoundment was Designed B	v [.] Stanley Consultants	

Has there ever been a failure at this site? YES	NO _	X
If So When?		
If So Please Describe :		

Has there ever been significant seepages at this site?	YES	NO _	X
If So When?			
IF So Please Describe:			

Phreatic water table levels based or at this site?		NOx
	1115	1101
If so, which method (e.g., piezome	eters, gw pumping,)?	
If so Please Describe:		
ii so i lease Describe .		