



Upper Peninsula Power Company
500 North Washington Street
Ishpeming, MI 49849
www.UPPCO.com

September 11, 2014

FERC Project No. 10855-006

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Secretary Bose:

Fish Tissue Monitoring for Silver Lake-Update.

On December 5, 2012, Upper Peninsula Power Company (UPPCO) received a letter from the Commission summarizing the 2012 fish tissue and sediment monitoring report completed as part of the Order Modifying and Approving the Water Quality Monitoring Plan under Article 408 dated March 3, 2005.

In the December 5, 2012 letter from the Commission, it states the following: "You (UPPCO) should perform fish tissue analysis using the approved methods in the Silver Lake storage basin when it is stable; please provide the report to the agencies for comment prior to filing with the Commission."

The Silver Lake Storage Basin was refilled and "stable" in August of 2013. As a result, UPPCO contacted the agencies (Michigan Department of Environmental Quality (MDEQ) and Michigan Department of Natural Resources (MDNR)) about fish tissue monitoring this year (the MDEQ had agreed in 2012 to complete the fish tissue monitoring for UPPCO in Silver Lake Storage Basin in 2014). By email, the MDEQ indicated they did not complete fish tissue monitoring in 2014, but would complete fish tissue monitoring for UPPCO at the Silver Lake Storage Basin in 2015. Please see Appendix 1 for documentation of consultation.

As a result, UPPCO is providing an update to the Commission, indicating fish tissue monitoring for Silver Lake Storage Basin will be completed according to the approved methods in 2015 and UPPCO will provide the Commission a report by October 1, 2015.

Mr. Kimberly D. Bose
September 15, 2014
Page 2 of 2

Should have any questions relative to this information, please do not hesitate to contact Shawn Puzen at (920) 433-1094.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Snyder", with a long horizontal flourish extending to the right.

Gil Snyder
Manager - Regional Generation
for Wisconsin Public Service

scp/rjf

cc:	Mr. Kyle Kruger, MDNR	Mr. Burr Fisher, FWS
	Mr. Mitch Koetje, MDEQ	Mr. Virgil Schlorke, UPPCO
	Mr. John Zygaj, FERC-Chicago	Mr. Robert Meyers, UPPCO
	Ms. Joan Johaneck, WPS	Mr. Keith Moyle, UPPCO
	Ms. Patricia Grant, FERC - Chicago	Mr. Mark Metcalf, IBS

Appendix 1

Documentation of Consultation

Puzen, Shawn C

From: Casey, Steve (DEQ) <CASEYS@michigan.gov>
Sent: Wednesday, September 03, 2014 11:31 AM
To: Puzen, Shawn C; Koetje, Mitch (DEQ)
Cc: Metcalf, Mark W; Bohr, Joseph (DEQ); Carpenter, Koren (DEQ)
Subject: RE: Fish Tissue Monitoring - Silver Lake Storage Basin

Shawn,

Sorry, but we didn't sample this year. We will have crews in the area next year and will do the sampling then. Do you need us to communicate with FERC on this issue?

From: Puzen, Shawn C <SCPuzen@integrysgroup.com>
Sent: Wednesday, September 3, 2014 10:00 AM
To: Casey, Steve (DEQ); Koetje, Mitch (DEQ)
Cc: Metcalf, Mark W
Subject: FW: Fish Tissue Monitoring - Silver Lake Storage Basin

Mitch and Steve-

Are you aware if any fish tissue sampling and analysis occurred this year at Silver Lake? As you can see below, we have not been successful in finding any results from the MDNR. We are looking for the results because we are required to report them to the FERC.

Are you able to provide us confirmation of whether or not MDEQ completed any sampling per Bill Taft's commitment below?

We understand Bill is no longer with the agency, maybe you may be able to tell us who may have picked up those duties.

If you do not know, we may try to contact Koran Carpenter, Diana Klemens, or Gary Kohlhepp.

We came to you two first because the commitment came from the consent judgment.

Thanks,

Shawn C. Puzen
Environmental Consultant | Environmental Services | Integrys Business Support, LLC
920-433-1094

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From: Metcalf, Mark W
Sent: Friday, August 22, 2014 8:05 AM
To: Puzen, Shawn C
Subject: FW: Fish Tissue Monitoring - Silver Lake Storage Basin

FYI, MDEQ did not collect tissue samples on Silver Lake this year.

Mark Metcalf
Environmental Consultant - Air & Water | Integrys Business Support, LLC
920-433-1833
920-606-8432 cell
mwmetcalf@integrysgroup.com

From: Madison, George (DNR) [mailto:MADISON@michigan.gov]
Sent: Friday, August 22, 2014 7:38 AM
To: Metcalf, Mark W
Subject: RE: Fish Tissue Monitoring - Silver Lake Storage Basin

Hello Mark,

I'm not aware if DEQ visited Silver Lake or not, and unfortunately this waterbody was not on their list of desired collections that they sent out this spring. I wish I would have known earlier in the year and we could have had one of our staff who fish the lake collect some pike.

From: Metcalf, Mark W [mailto:MWMetcalf@integrysgroup.com]
Sent: Friday, August 22, 2014 7:59 AM
To: Madison, George (DNR)
Subject: FW: Fish Tissue Monitoring - Silver Lake Storage Basin

Good morning George,

As indicated in the email chain below, MDEQ was planning to conduct fish tissue sampling on predator species present in the Silver Lake Storage Basin in 2014. Can you advise whether this sampling has occurred yet? If so, Can you forward a copy of the results to me so that UPPCO can provide the fish tissue sampling results to FERC?

Thank you,
Mark

Mark Metcalf
Environmental Consultant - Air & Water | Integrys Business Support, LLC
920-433-1833
920-606-8432 cell
mwmetcalf@integrysgroup.com

From: Taft, Bill (DEQ) [mailto:TAFTW@michigan.gov]
Sent: Wednesday, December 19, 2012 1:50 PM
To: Metcalf, Mark W; Koetje, Mitch (DEQ); Casey, Steve (DEQ); Klemans, Diana (DEQ); Bohr, Joseph (DEQ)
Cc: Puzen, Shawn C; Meyers, Robert J; Schlorke, Virgil E; Kohlhepp, Gary (DEQ); Scott, Steven (DNR); Madison, George (DNR)
Subject: RE: Fish Tissue Monitoring - Silver Lake Storage Basin

Mark, in the attached memo signed by the DEQ-Water Resources Division and DNR-Fisheries Division, it explicitly states on the bottom of page 1 that "monitoring will only take place upon refill of the Silver Lake Reservoir and monitoring will not occur prior to 2014". In keeping with the plan, the state intends to monitor the Silver Lake Storage Basin for fish tissue samples in 2014. The \$50,000 dollars that was provided by UPPCO for this monitoring effort will be used at that time for all associated activities.

If you have any questions, please contact me.

William Taft
Aquatic Biologist
517-335-4205

From: Metcalf, Mark W [<mailto:MW.Metcalf@integrysgroup.com>]
Sent: Friday, December 07, 2012 4:49 PM
To: Taft, Bill (DEQ); Koetje, Mitch (DEQ); Casey, Steve (DEQ)
Cc: Puzen, Shawn C; Meyers, Robert J; Schlorke, Virgil E
Subject: Fish Tissue Monitoring - Silver Lake Storage Basin

Good afternoon everyone,

Per the Water Quality Monitoring Plan for the Dead River Hydroelectric Project, Upper Peninsula Power Company (UPPCO) is required to monitor mercury levels in resident predator fish species in 2012, and every 10 years thereafter for the term of the License. On March 21, 2012, UPPCO contacted the MDNR and MDEQ regarding fish tissue monitoring within the Dead River Hydroelectric Project. As required by the water quality monitoring plan, UPPCO contacted the agencies to identify and sample the target species of interest and identify the location(s) to be sampled based on current information available to the MDEQ and MDNR. With regards to sampling at the Silver Lake Storage Basin, UPPCO entered a Consent Judgment with MDEQ related to the restoration of the Dead River dated June 3, 2009 (please refer to the attached document). As part of the Judgment, UPPCO contributed \$50,000 to the Natural Resources Damage Fund specifically to support fish tissue contaminant monitoring in the Silver Lake Reservoir. Therefore, UPPCO recommended that fish tissue monitoring as part of the water quality monitoring plan be focused on the Dead River and McClure Storage Basins.

In response to UPPCO's consultation, MDNR and MDEQ indicated that as MDNR fisheries staff was scheduled to sample only the Dead River Storage Basin in 2012, the agencies recommended that sampling only occur in that impoundment in 2012. Fish collection from the McClure Storage Basin could be waived for 2012. With regards to the Silver Lake Storage Basin, it was recommended that since the Silver Lake Storage Basin is slowly filling and needs time to stabilize, sampling would be waived for 2012, and should occur in the year that the basin is full; at which time, a predator species should be collected and analyzed to establish baseline mercury tissue concentrations. Sampling of the Dead River Storage Basin was conducted in August 2012, and the results of the monitoring were provided to the MDNR, MDEQ and FWS on 9/6/12.

As UPPCO has provided funds to the Department as part of the Consent Judgment specifically to support fish tissue contaminant monitoring at the Silver Lake Storage Basin, we are requesting confirmation that the baseline monitoring will be conducted by the resource agencies in the year that the basin is full and that UPPCO will not be required to sample or analyze fish tissue samples from the reservoir until the next scheduled sampling event. In 2022 (the next scheduled sampling event per the water quality monitoring plan), UPPCO will consult with the resource agencies to identify and sample the target species of interest and identify the location(s) to be sampled based on current information available to the MDEQ and MDNR.

With regards to reservoir operation, in 2012 the Silver Lake reservoir reached the long term, maximum reservoir operating level of 1481.5 feet. In accordance with the Silver Lake refill plan, the reservoir still needs to be filled to the spillway elevation of 1485.2 feet for dam safety purposes and the three year period of operational testing still needs to occur, however; the reservoir is at least at the long term operating level for the facility. Consequently, the reservoir could be considered "full", and baseline sampling of the reservoir could occur if desired. With this information, UPPCO is requesting that the agencies provide an estimate of when baseline sampling of the Silver Lake Reservoir could occur so that the FERC can be informed as to the tentative plan for monitoring fish tissue.

Thanks,
Mark

Document Content(s)

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