



STATEMENT of POSITION

Alba Injection Well

Friends of Clam Lake

In western Emmet County, south of Harbor Springs, Bay Harbor Resort was developed on a site that had previously contained a cement plant. During development, kiln dust remaining on the site from operation of the plant was buried and is now leaching into area waters. CMS, one of the principal developers and the firm responsible for clean-up of the site, is collecting the leachate containing kiln dust and trucking it to Grand Traverse County's septage treatment plant and a commercial disposal well in Montmorency County. They have now proposed to truck the waste to a deep injection well in northern Antrim County in Alba.

The Board of Directors of Friends of Clam Lake has reviewed information available concerning the proposal to clean-up the site. Based on that review, we find the following:

- There is no guarantee that the solution injected into a deep well will not contaminate the surrounding waters. In fact, one estimate has suggested a one-in-ten chance. If that should happen it would be a disaster for northern Antrim County and could, over time, spread to contaminate waters throughout the Jordan River watershed, all of Antrim County and Lake Michigan.
- Over a twenty year period, based on the proposed level of trucking the solution, less than one percent of the dust will have been removed.
- Currently proposed alternatives to the injection well need to be fully explored before any further action. For the long term, all responsible companies must work with federal, state and local agencies to expedite the building of a treatment plant in Emmet County.

Based on the above points, the Friends of Clam Lake, Inc. organization is absolutely opposed to the use of deep well injection as the solution to clean-up of the Bay Harbor Resort problem.