



MICHIGAN GROUND WATER ASSOCIATION

To educate our members to provide, protect and promote groundwater as a safe and viable resource.

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February 14, 2023

Michigan Department of Environment, Great Lakes, and Energy,
Drinking Water and Environmental Health Division,
Attention: David DeYoung
Constitution Hall,
525 W Allegan Street, 4th Floor-South,
P.O. Box 30817, Lansing, MI 48909-8311

Dear Mr. DeYoung,

I write concerning the proposed changes to administrative rules 325.1601 – 325.1781 concerning the ASTM International specification C 150-89 “standard Specification for Portland Cement.” The Michigan Ground Water Association supports the Pending Rule Set 2022-39 EQ.

MGWA supports the rule changes because Type I cement has been discontinued by the manufacturers of Portland Cement. Due to Type I cement no longer being available, wells which are grouted with cement, shallow bedrock wells, and abandonment of wells cannot be legally done; this endangers the public health.

Type IL cement is the reasonable alternative being offered by manufacturers of Portland Cement. Even though it has the same cementitious qualities as Type I, it is not an approved alternative at this time; the Pending Rule Set would fix this problem and allow the use of Type IL.

Approving the proposed rule changes under Pending Rule Set 2022-39 EQ will further public health and safety by allowing the proper grouting of wells, shallow bedrock wells, and the abandonment of wells. MGWA fully supports these changes under Pending Rule Set 2022-39 EQ.

Thank you for the opportunity to provide written comments in support of Pending Rule Set 2022-39 EQ.

Respectfully,

Charles “Buddy” Sebastian,
President



2937 Atrium Drive, Suite 200
Okemos, Michigan 48864
Toll Free: 800-678-9622

February 21, 2023

Michigan Department of Environment, Great Lakes, and Energy,
Drinking Water and Environmental Health Division,
Attention: David DeYoung
Constitution Hall,
525 W Allegan Street, 4th Floor-South,
P.O. Box 30817, Lansing, MI 48909-8311

Dear Mr. DeYoung,

On behalf of the Michigan Concrete Association, I write regarding the proposed changes to Michigan Administrative Rules 325.1601 – 325.1781 concerning the ASTM International specification C 150-89 “standard Specification for Portland Cement.” The Michigan Concrete Association supports the Pending Rule Set 2022-39 EQ.

MCA supports the proposed rule changes that are necessary. In order to be a good environmental steward, the cement industry has made changes to their product in order to reduce the amount of greenhouse gas released during the production of cement. As a result, the cement specified in the current rules is no longer being manufactured and is not available. Wells which are grouted with cement, shallow bedrock wells, and abandonment of wells cannot legally be done. Without cement as an option, public health is put at risk.

Type II cement is the reasonable alternative being offered by manufacturers of Portland Cement. Even though it has the same cementitious qualities as Type I, it is currently not an approved alternative; the Pending Rule Set would resolve this matter and allow the use of Type II.

Approving the proposed rule changes under Pending Rule Set 2022-39 EQ will further public health and safety by allowing the proper grouting of wells, shallow bedrock wells, and the abandonment of wells. MCA fully supports these changes under Pending Rule Set 2022-39 EQ.

Please incorporate this communication in support of Pending Rule Set 2022-39 EQ as our official comments under the public comment period of the rule making process.

Respectfully,



Daniel M. DeGraaf, PE,
Michigan Concrete Association
Executive Director/CEO