

DTE Electric Company — Belle River Power Plant and Range Road Landfill

Coal Combustion Residuals Fugitive Dust Plan

1.0 Purpose

The purpose of this Coal Combustion Residuals (CCR) Fugitive Dust Plan (the "plan") is to establish measures to minimize CCR from becoming airborne at the facility as outlined in 40CFR257.80.

2.0 Scope

The plan applies to measures to control CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

3.0 Site Description

Belle River Power Plant is located in China and East China Townships in Michigan. The plant is located approximately 1 mile west of the St. Clair River between Lake Huron and Lake St. Clair. Belle River Power Plant is an ISO14001 certified facility. There are two CCR surface impoundments at the site: two bottom ash basins to the north of the plant and a tertiary settling basin called the diversion basin to the east of the plant. Both CCR units are licensed under one operating license in accordance with Michigan's solid waste disposal licensing requirements (Operating License 9630, 2020). Flow from the diversion basin is outfall 001B and receives waters from the bottom ash basins and the Range Road Landfill.

Range Road Landfill (RRLF) is an existing CCR landfill located north of the Belle River Power Plant property. RRLF is licensed in accordance with Michigan's solid waste disposal licensing requirements (Operating License 9603, 2020), and is licensed to accept coal ash and waste coal material.

4.0 Dust Control Measures

The following dust control measures provide site specific mechanisms to manage and minimize fugitive dust created from CCR management operations and were developed in accordance with good engineering practices. Many measures for dust control are used throughout the power plant property. These include limiting speed, water sprays, dust suppressant application, conditioning, the use of a vacuum sweeper and others. All control measures can be used where appropriate except when freezing conditions exist or as otherwise specified. Additional dust control measures will be taken as appropriate.

The speed limit on all paved and unpaved travel surfaces is 10 miles per hour (mph). All ash haul roads to the Range Road Landfill are posted at 10 mph. These speed limits apply to all traffic.

Paved and unpaved surfaces are regularly water-flushed, as necessary. Paved surfaces are also frequently vacuum-swept. Water-flushing is done using wash down hoses, a water truck, or one of the plant's water wagons using copious amounts of water. During periods where there is no precipitation, water is applied to paved and unpaved surfaces multiple times per day. Unpaved roads and parking lots are also treated with dust suppressant throughout the year, as needed.

5.0 Effectiveness Assessment & Monitoring

The effectiveness of this plan will be assessed through several avenues. First and foremost, plant personnel perform routine inspections throughout the facility daily. Instances of fugitive dust observed on the property are addressed in a timely manner.

Agency inspections are also done on a regular basis. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) inspects all emissions and fugitive dust controls on an annual basis. These agency inspections are in addition to site environmental personnel being at the facility for water discharge sampling, weekly visual CCR inspections or other activities. The entire plant property, including the CCR units, is included in the periodic facility environmental audit plan coordinated by the corporate environmental organization as well.

Any complaints filed by citizens regarding fugitive dust or other environmental issues at the facility are logged and tracked via procedures set forth by the plant's ISO14001 environmental management system. The complaint will be recorded, the cause of the complaint will be investigated, and corrective action will be taken if warranted.

6.0 Amendment of Plan

This plan will be reviewed periodically by the DTE Energy Environmental Management and Safety organization. Reviews and revisions will be documented in the Revision History section (8.0) of this plan. Any construction of a new CCR unit or change in the operation or construction of an existing CCR unit will be assessed for necessary changes to this plan.

7.0 Reporting & Recordkeeping

An annual CCR fugitive dust control report will be completed as required under 40CFR257.80(b)(7)(c). The report will document that the fugitive dust control measures identified in this plan are applicable and appropriate for site conditions, by including a description of actions taken to control CCR fugitive dust, a record of citizen complaints, and a summary of any corrective measures taken.

All files and information will be maintained in a written operating record as required by 40CFR257.105(g). Notifications will be made as required by 40CFR257.106(g). Website postings will be made as required by 40CFR257.107(g).

8.0 Revision History

Revision No.	Revision Date:	Changes
0	10/19/2015	Original Document
1	7/17/2019	Provided additional details in sections 4.0 and 7.0.
2	11/9/2021	Provided operating license information in section 3.0. Refined activities in section 5.0.

PROFESSIONAL ENGINEER CERTIFICATION
40 CFR 257.80(b)(7)

CERTIFICATION: By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 257.80, that I or my designated agent have visited and examined the facility, that this plan has been prepared in accordance with good engineering practices, and with the requirements of this Part, that the plan is adequate for the facility.

Signature: Nicholas Reidenbach

Engineer: Nicholas Reidenbach

Registration No.: 6201060717 State: Michigan

Date: 11/8/2021

SEAL:

