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TECHNICAL MEMORANDUM

TO: Chris Scieszka, DTE Energy
Rob Lee, DTE Energy

DATE: December 4, 2015
Rev 1: August 30, 2019

BY: Scott Hutsell, AECOM

PROJECT: DTE NOI – Inactive Bottom
Ash Impoundment

RE: **Notice of Intent Inactive Bottom Ash Impoundment
DTE Monroe Power Plant**

Notice Of Intent

This Notice of Intent is required by the United States Environmental Protection Agency under the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES [RIN-2050-AE81; FRL-9149-4] (EPA Final CCR Rule) Presented below is the project background, summary of findings, limitations, and certification.

1.0 SITE BACKGROUND

The current Inactive Bottom Ash Impoundment area was constructed in the late 1960's by building a perimeter dike to surround a low area of the adjacent Lake Erie; the area south of the plant was removed from the Waters of the United States by an Act of Congress prior to plant construction. CCR materials have been placed and allowed to drain into the pond from the north end of the pond; these materials currently form a delta that extends about 1/3 of the way into the pond.

2.0 REGULATORY BACKGROUND

The Inactive Bottom Ash Impoundment is subject to the requirements of 40 C.F.R. §257.100 of the EPA Final CCR Rule as amended. Therefore, the original Notice of Intent to initiate closure was posted to the operating record by December 17, 2015.

3.0 NARRATIVE DESCRIPTION OF CLOSURE

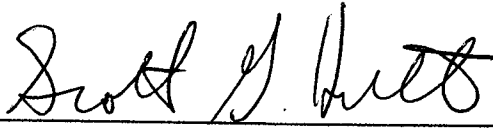
The Inactive Bottom Ash Impoundment contains CCR materials that have been sluiced to the impoundment over time; fill materials have been added to the impoundment from north to south with initial materials being placed in the impoundment area once electric generation started in the early 1970s. The area defined for closure is shown on Figure 1 and totals approximately 86.4 acres.

The Inactive Bottom Ash Impoundment will be closed by removal, with dewatering to occur through the lowering of the outfall elevation of the weir. Closure operations will involve: (i) Dewatering of and runoff diversion from the

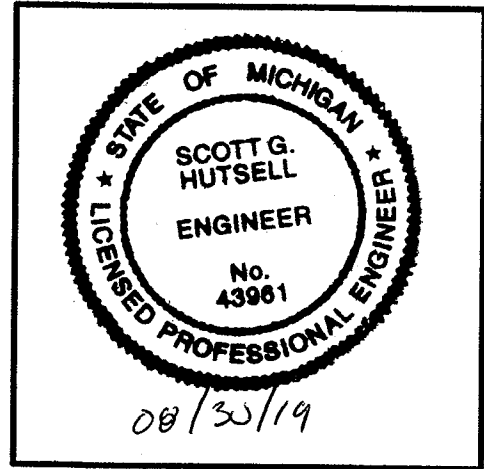
basin, (ii) excavation and removal of the CCR material from the impoundment, and (iii) regrading to final desired grades using borrow soil for fill, as needed. A high level closure schedule is provided as Attachment A of this submittal.

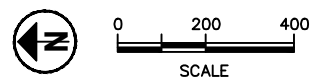
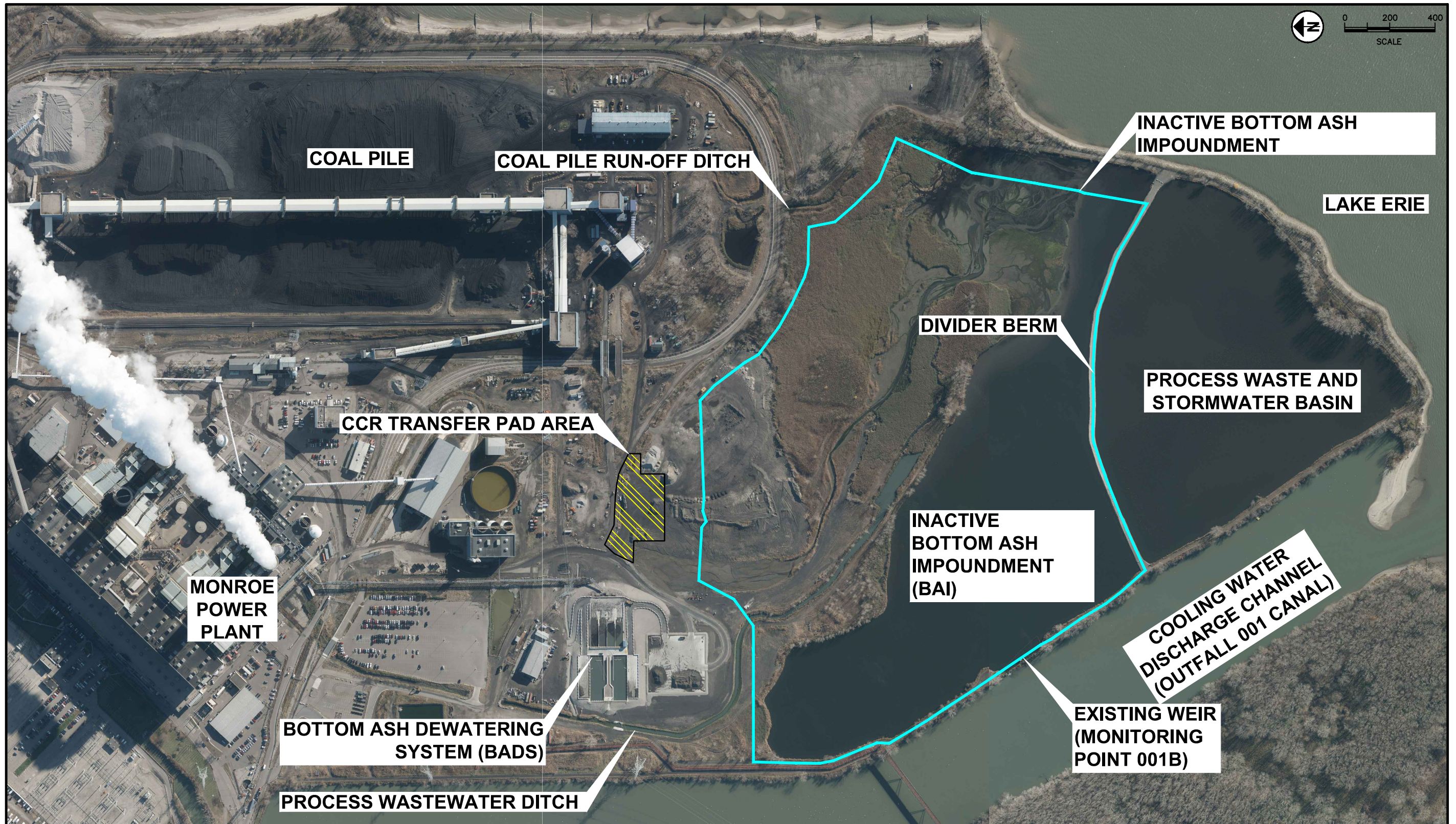
4.0 CERTIFICATION

I, Scott G. Hutsell, being a Registered Professional Engineer in good standing in the State of Michigan, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification is prepared in accordance with the accepted practice of engineering. I certify that the information contained in this certification is accurate per the Coal Combustion Residual (CCR) Rule, 40 CFR § 257.100 (b)(4) and 40 CFR § 257.100 (b)(6) as required by 40 CFR § 257.100 (c)(1).



Printed Name





AECOM



DTE Electric Company

PROJECT DTE MONROE INACTIVE BAI CLOSURE
 SUBJECT AERIAL PHOTO SITE PLAN
 DELINEATING CLOSURE LIMITS
 SCALE AS SHOWN

JOB NO. 60516675
 DATE 8/13/2019
 DRAWN BY ANR
 SHEET NO. 1 of 1

**DTE ENERGY MONROE POWER PLANT
 BOTTOM ASH IMPOUNDMENT
 CLOSURE CONSTRUCTION SCHEDULE**

TASKS	ESTIMATED COMPLETION DATE	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Initial Written Closure Plan Placed in Operating Record	August 17, 2018 Revised: August 30, 2019												
Notification of Intent to Close Placed in Operating Record	12/17/2015 Revised: August 30, 2019												
Closure Design Activities	2019-2020 (Estimated)												
Coordinating with State Agencies for Compliance	2019-2020 (Estimated)												
Acquiring State Permits	2020 (Estimated)												
Mobilization	2020-2021 (Estimated)												
Dewater Impoundment	2021 (Estimated)												
CCR Material Excavation	2021-2024 (Estimated)												
Placement of Fill	2024-2025 (Estimated)												
Estimate of Year in which all closure activities will be completed	2025												