

DTE Energy®



Prepared for

DTE Energy
One Energy Plaza
Detroit, Michigan 48226

2015 ANNUAL INSPECTION REPORT VERTICAL EXTENSION LANDFILL

MONROE POWER PLANT

Monroe, Michigan

Prepared by

Geosyntec 
consultants

engineers | scientists | innovators

134 North La Salle Street, Suite 300
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CHE8242H5

January 2016

14 January 2016

Via email

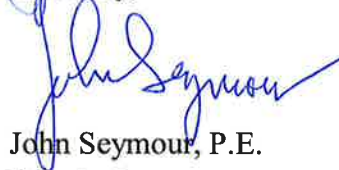
Mr. Joseph Garavaglia
DTE Energy
1 Energy Center
Detroit, Michigan 48226

**Subject: 2015 Annual Inspection Report
Monroe Plant Vertical Extension Landfill Annual Inspection**

Dear Mr. Garavaglia:

Geosyntec Consultants (Geosyntec) is pleased to provide you with the attached final Annual Inspection Report file as a pdf. It is to be placed in the operating record and on the publicly accessible internet website on January 18, 2016 in accordance with 40 CFR 257. Please call if you have any questions.

Sincerely,



John Seymour, P.E.
Principal

Copies to: William Neal, P.E. - DTE Energy
Omer Bozok, P.E. - Geosyntec

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1. INTRODUCTION

1.1 Overview

This 2015 Annual Inspection Report (AIR) was prepared by Geosyntec Consultants (Geosyntec) to provide the results of the annual inspection of the coal combustion residuals (CCR) vertical extension landfill (Landfill) at the DTE Energy (DTE) Monroe Power Plant disposal facility. The annual inspection has been prepared to comply with United States Environmental Protection Agency (USEPA) Coal Combustion Residuals Rule (CCR Rule) published on April 17, 2015 (40 CFR 257.84). Under the CCR Rule, the Landfill is an “existing landfill” per 40 CFR 257.53 and must be inspected by a qualified professional engineer on a periodic basis, not to exceed one year.

The Landfill is located about one mile southwest of the Monroe Power Plant near Monroe, Michigan, and is bounded on the east by Lake Erie and the Plant discharge canal, on the west by Interstate Highway 75 (I-75), on the south by an agricultural field, and on the north by residential property and Plum Creek (see **Figure 1**). It is constructed on top of fly ash that was previously deposited in the Monroe Ash Basin. The combined Landfill, Ash Basin and surrounding property owned by DTE is considered the “Site”.

Landfill Phase 1 construction began in August 2015, the Michigan Department of Environmental Quality (MDEQ) licensed the area for disposal via email communication on October 14, 2015, and CCR was placed in the unit beginning October 16, 2015. CCR disposal continued after 19 October 2015¹ as witnessed during the inspection conducted on December 18, 2015. Landfill construction is ongoing and continuous for remaining phases.

1.2 Purpose

The purpose of the inspection under the CCR Rule [40 CFR 257.84(b)(1)] is:

“...to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection must, at a minimum, include:

- (i) A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspection by a qualified person, and results of previous annual inspections); and

¹ Based on the CCR Rule, existing landfill is “...landfill that receives CCR both before and after October 19, 2015, or for which construction commenced prior to October 19, 2015 and receives CCR on or after October 19, 2015...”.

- (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.”

The purpose is accomplished through periodic visual inspection (and photo-documentation) of the Landfill, review of instrumentation monitoring data and evaluations intended to detect signs of instability, and review of construction certification documentation, and review of operating records since it began receipt of CCR.

1.3 Report Organization

The remainder of this report is organized as follows:

- Section 2 - Review of available information: summarizes various historical documents that were reviewed as part of this inspection
- Section 3 – Facility Description: provides information about the facility
- Section 4 – Visual Inspection Results: summarizes visual observations recorded during inspections of the Landfill
- Section 5 - Instrumentation Monitoring: presents the data from instrumentation monitoring
- Section 6 – Operation Activities: describes the operations organization and activities
- Section 7 – Evaluation: evaluates the results of the annual inspection
- Section 8 – Conclusions and Certification: provides the overall conclusions of the annual inspection

1.4 Terms of Reference

The annual visual inspection was performed by Mr. John Seymour, P.E. of Geosyntec whose qualifications as a “qualified professional engineer” under the CCR Rule are presented in Appendix A. DTE’s “qualified person”, who conducts the weekly inspections, accompanied Mr. Seymour.

This report was prepared by Mr. John Seymour, P.E. of Geosyntec. The peer review was completed by Mr. Omer Bozok, P.E. of Geosyntec. John Seymour, P.E. and Omer Bozok, P.E. of Geosyntec are qualified professional engineers per the requirements of §257.53 of the CCR Rule. Mr. Seymour was involved in the technical review of the ash basin permit modification and design for the vertical extension landfill on behalf of DTE. Both engineers have been heavily involved

with the Site since 2009, the initiation of the design and construction efforts for the mitigation of the ash basin embankment.

2. REVIEW OF AVAILABLE INFORMATION

Geosyntec reviewed the following documents for the annual inspection. These documents are summarized in the table below.

Table 1: Available Information Reviewed for Annual Inspection

Title	Prepared by	Year	Content
Geotechnical Site Characterization Report	Geosyntec	2012	Summary of data from various site investigation studies conducted for the initial ash basin design (1970s) below the Landfill and around the perimeter of the ash basin, and subsequent investigations through 2012.
Permit Modification (Application)- DTE Energy Monroe Power Plant Ash Basin	Golder	April 16, 2015	Application documents for the “Overliner” (Landfill) at the Ash Basin; contains Summary Report and Appendices A through H.
Engineering Drawings titled “DTE Energy Monroe Fly ash Basin Construction Permit Application Modification”	Golder	April 16, 2015	Appendix E contained in the Permit Modification Application Report (16 April 2015)
Engineering Information- DTE Energy Monroe Power Plant and Ash Basin	Golder	April 16, 2015	Appendix F contained in the Permit Modification Application Report (16 April 2015)

Title	Prepared by	Year	Content
Operations and Monitoring Plan, DTE Energy Monroe Power Plant and Ash Basin	Golder	April 16, 2015	Appendix G contained in the Permit Modification Application Report (16 April 2015)
Construction Quality Assurance Plan MPP Fly Ash Basin Overliner Construction”	Golder	April 16, 2015	Appendix H contained in the Permit Modification Application Report (16 April 2015)
Solid Waste Disposal Area Construction Permit No. 4147	MDEQ	July 31, 2015	Permit to construct the Landfill in accordance with permit application documents dated 16 April 2015.
DTE Monroe Power Plant Ash Basin – Phase 1 Construction Documentation Report	Golder Associates	September 16, 2015	Vertical Extension Landfill construction completion and construction quality assurance document.
Email License to Operate Phase 1	MDEQ	October 14, 2015	Email providing authorization to commence operations with a commitment to follow up in writing.
Fugitive Dust Plan	DTE	2015 ²	Presents dust control measures.
Weekly Inspection Reports	DTE Energy	November 11, 17, 23, 30 and December 3, 10 and 17 in 2015	Qualified person inspections
CCR disposal records (Excel spreadsheets)	Headwaters	2015	Documentation of waste tonnage placed in the CCR landfill

² The Fugitive Dust Plan (FDP) is not dated but DTE reported to Geosyntec that the FDP is based on an EPRI template completed in September 2015; therefore, the date is simply identified as “2015.”

Title	Prepared by	Year	Content
Headwaters Letter	Headwaters	2015	Documenting the training of operations personnel per the Operating Plan

3. FACILITY DESCRIPTION

3.1 Overall Site Description

The overall site is composed of the 410 acre Ash Basin located in Section 16, Township 7 south, Range 9 east, of Monroe Township, Michigan shown on **Figure 1**. The site contains both a Type III low-hazard industrial waste Landfill and Type III Industrial Waste Surface Impoundment. The Surface Impoundment (Ash Basin), is licensed under Michigan Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 License No. 9393, issued on 12 June 2014 and expires on 12 June 2019. CCRs are placed in the Ash Basin by use of a “wet” (sluiced) disposal method. Pore water from the below the vertical extension settles in the Ash Basin and is ultimately discharged under a Michigan National Pollutant Discharge Elimination System (NPDES) permit issued by the MDEQ (Permit No. MI0001848).

The Landfill is designated as a 79 acre “dry” disposal area located on top of the Ash Basin that has been filled with CCR approximately to the originally planned final grade. The site investigation conducted in 2015 identified the fly ash below the Landfill to be approximately 40 feet deep from preconstruction ground surface. The water level in the Ash Basin is maintained around 609 ft; the pore water elevations in the ash below the Landfill were measured to be 3 to 6³ ft below grade in piezometers in the fly ash prior to construction.

The Landfill is licensed to receive bottom ash, fly ash, flue gas desulfurization (FGD) scrubber wastewater sludge, solidified with fly ash or bottom ash, synthetic gypsum, inert material and any other waste allowed by Rule or obtained through specific regulatory approval (Permit Modification Report, Golder, 2015).

Phase 1 of the Landfill, finished in September 2015, is the western 11 acre portion shown on Figure 1. Record drawings of the construction are provided in Appendix B.

3.2 Design

The design was provided by Golder in the Permit Modification report (April 16, 2015). The components of the Landfill include:

- Perimeter Collection Swale
- Prepared subgrade consisting of in-situ sluiced fly ash and placed general fill;

³ One reading that was out of this range was discounted as it appeared to be an erroneous reading.

- 30-inch thick pore pressure relief layer, including
 - 24- inches of bottom ash or limestone;
 - Perforated collection piping encased in a filter fabric (“sock”);
 - Separation geotextile, non-woven, needle-punched geotextile
 - 6-inch embedment layer; and
- Perimeter berm.

The Landfill (Overliner) system components are described by Golder in the Construction Documentation Report (Section 5) as follows:

“Phase 1 of the overliner is trapezoidal in shape with an overall length of approximately 880 feet generally in the north-south direction and a width that increases from approximately 530 feet generally east-west along the north, to approximately 770 feet along the south. The subgrade slopes away from a generally trending east-west centerline at a 0.5 percent grade towards the perimeter swale. Phase 1 is shown in the Record Drawings included with this report. The perimeter swale encompasses the entire perimeter of the overliner footprint. The Phase 1 subgrade occupies the western approximately 13.4 acres of the overliner. Within the permit, it was originally intended that the centerline pipe corridor would be constructed during phase 1 for the entire overliner area including the approximately 660 feet within the Phase 1 limits as well as the balance of the corridor estimated at an additional approximately 2,600 feet. However, it became clear during construction that contractor equipment access across the centerline of the overliner during the remainder to be constructed may be (*sic*) potentially damage the pipe. Thus, as verbally agreed to with the MDEQ, the centerline pipe corridor will be completed as the remainder of the overliner is constructed.”

Perimeter Swale

“The perimeter swale provides the collection for the pore water relief piping drainage, and outlets the collected water to the south through one of three outfalls. The swale has a typical 12 foot wide bottom, 3 foot depth, and 3 horizontal to 1 vertical (3H:1V) side slopes. The swale is divided into four main runs, R1 along the north and west limits, R2 along the north and east limits, R3 along the west half of the south, and R4 along the east half of the south limits.”

Pore Pressure Relief System

“The pore pressure relief system is constructed directly over the subgrade. The system is comprised of a 30-inch thick granular layer, a series of socked perforated collection pipes and a geotextile separation layer. The granular layer consists of on-site bottom ash and imported limestone; the piping is made up of 6-inch and 8-inch diameter socked corrugated landfill piping from ADS, and the separation layer is Geoturf N800, a non-woven 8 ounce per square yard geotextile.”

Perimeter Berm

“Along the north, west, and south limits of Phase 1 there is a perimeter berm built at the outer edge and on top of the pre pressure relief layer, which provides the limits for CCR fill placement. The berm is built from on-site structural fill soils and is 29 feet wide across the bottom, 5 feet wide across the top, 4 feet high, and has three horizontal to one vertical (3H:1V) external and internal slopes.”

Monitoring Equipment

“During the construction of the overliner, DTE installed monitoring equipment consistent with the equipment specified in the currently permitted Operations Plan. This equipment consisted of three settlement plates, six vibrating wire piezometers, and two slope inclinometers. The purpose of the equipment is to allow DTE to monitor the ash fill during future operations.”

3.3 Construction

Construction of Phase 1 was certified as follows:

“...the components presented in this report were constructed in compliance with the facility permit, the regulations, and the CQA Plan”

This statement was signed by David List, P.E., of Golder & Associates on September 19, 2015; the certification is contained in the Phase 1 Construction Documentation Report (Golder).

4. VISUAL INSPECTION RESULTS

The annual inspection was completed on December 18, 2015. The completed inspection report form and photographs are presented in Appendix C.

In summary, no evidence of instability or detrimental settlement was noted. The entire Landfill, including the Perimeter Berms and Perimeter Swales are located within the drainage area of the Ash Basin. Any potential sediments from erosion will be deposited in the Ash Basin, where there is no concern of offsite migration. Any potential runoff will be managed under the NPDES permit for the Ash Basin.

The volume of CCRs in the Landfill just after the annual inspection was estimated by Geosyntec to be approximately 9,200 CY. This estimate is based on the 11,138 tons reported by Headwaters (Appendix D) and assuming a unit weight of 90 lbs/cuft.

5. INSTRUMENTATION MONITORING

5.1 Inclinometers

Inclinometer locations are shown on Figure 8 in Appendix B. Inclinometers have been read upon installation and prior to filling operations.

5.2 Piezometers

Piezometer locations are shown on Figure 8 in Appendix B. Piezometers have been read upon installation and prior to filling operations.

5.3 Settlement Plates

Settlement plate locations are shown on Figure 8 in Appendix B. Settlement plates have been read upon installation and prior to filling operations.

6. OPERATION ACTIVITIES

6.1 Operations Organization

The Landfill was initially operated by DTE but the operations were contracted to Headwaters, Inc. The responsible personnel include:

- Rodney Welliver, Manager - Power Generation Engineering Fossil Generation - Environmental & Safety Projects, Monroe Power Plant
- Lisa Hagerty, DTE Environmental, Monroe Power Plant, Inspections
- Mark Ryan, Headwaters Manager
- Jason Jolly, Headwaters Supervisor, Site operations

6.2 Operation Activities

Operations are defined in Appendix G of the Permit Modification Report (Golder 2015). Appendix G is the “Operations, Monitoring and Action Plan” (“Operations Plan”). The following operation activities are described in the Operations Plan:

1. Hours of Operation
2. Site Access and Barriers
3. Traffic Control
4. Nuisance Control
5. Temporary Storage
6. Proposed Waste Types
7. Personnel and Training
8. Recordkeeping
9. Equipment
10. Filling Operations

11. Intermediate Cover Use
12. Water
13. Bottom Ash
14. Soil Cover
15. Chemical Sprays
16. Geotextiles and Rolled Erosion Control Products
17. Intermediate Cover Use Summary

The Operations Plan was written by DTE/Golder and approved by MDEQ in the 31 July 2015 construction permit.

In addition, the following are specifically currently required by the CCR Rule:

- Weekly inspections by a qualified person, and
- Dust control in accordance with a Fugitive Dust Control Plan.⁴

6.3 Observations

It was identified that the overall intent of the Operations Plan was being followed. Items 11 through 17 were not applicable at the time of the inspection.

⁴ DTE reported to Geosyntec on December 22, 2015 that there is only one FDP for the combined Ash Basin and Landfill. This FDP is posted on the DTE's CCR Website.

7. EVALUATION

7.1 Design

The design was completed by Golder in 2015 and is well documented in the April 16, 2015 Permit Modification Report and signed by a professional engineer licensed in Michigan. The design is consistent with recognized and generally accepted good engineering standards, based on available information.

7.2 Construction

Construction of Phase 1 was completed in September 2015 and is well documented in the September 16, 2015 Construction Documentation report, which was signed by a professional engineer licensed in Michigan. Construction is consistent with recognized and generally accepted good engineering standards, based on available information.

7.3 Maintenance

Maintenance had not been required as of the time of the inspection.

7.4 Operations

7.4.1 Operations Plan

The Permit Modification Report (Golder, April 16, 2015) included requirements for operations.

Operations are consistent with recognized and generally accepted good engineering standards

7.4.2 Fugitive Dust Control

A Fugitive Dust Control Plan was provided by DTE and is posted on the DTE CCR publicly accessible website. No dusting occurred during the site inspection to assess whether the plan was being implemented. In the absence of contrary information, dust control is consistent with recognized and generally accepted good engineering standards, based on available information.

7.4.3 Run on and Run off Control

Run on and run off control is maintained by the perimeter ditch and perimeter berm shown in the design and as constructed. A run on and run off control system plan is required by 40 CFR 257.83(c) by October 17, 2016. However, using current information, run on and run off controls are consistent with recognized and generally accepted good engineering standards.

7.4.4 Inspections

Weekly inspections have been completed and documented by qualified persons. The qualified persons were trained in April 2015. Weekly inspections for the Landfill were initiated on October 19th concurrent with the Ash Basin inspections although no separate inspection forms were provided for the Landfill. DTE reported that there was no mention of deficiencies for the Landfill in the weekly inspections. Written weekly inspections were initiated on November 11th. No indications of any deficiencies were identified in the weekly inspections. Inspections were consistent with recognized and generally accepted good engineering standards, based on available information.

7.4.5 Monitoring

The operations instrumentation monitoring included measurement of piezometers, settlement plates and inclinometers. The data from the filling period were not collected by DTE. However, minimal filling has occurred since operations began and there was no visual evidence of any instability or excessive settlement.

The CCR Rule provides minimum groundwater monitoring system requirements that must be implemented by October 2017. An evaluation regarding whether the groundwater monitoring system is consistent with recognized and generally accepted good engineering standards will be made once it is installed.

7.4.6 Annual Visual Inspection

The annual visual inspection did not identify any evidence of structural weakness or instability.

The four-foot high perimeter berm and perimeter swale did not have any topsoil or vegetation. However, the design approved by the MDEQ did not include a requirement to vegetate the berm and swale.

It is understood by Geosyntec that the existing license for the Ash Basin has a requirement to vegetate the surface of the fly ash in the Ash Basin when it reaches final grade. Consequently, the swale should be addressed as a part of the Ash Basin operations.

Further, because the vertical extension Landfill is entirely within the confinement of the Ash Basin, a soil erosion and sediment control permit is not required, implying that vegetation of the soil slopes of the perimeter berm may not be required.

8. CONCLUSIONS AND CERTIFICATION

The annual visual inspection did not identify any evidence of structural weakness or instability.

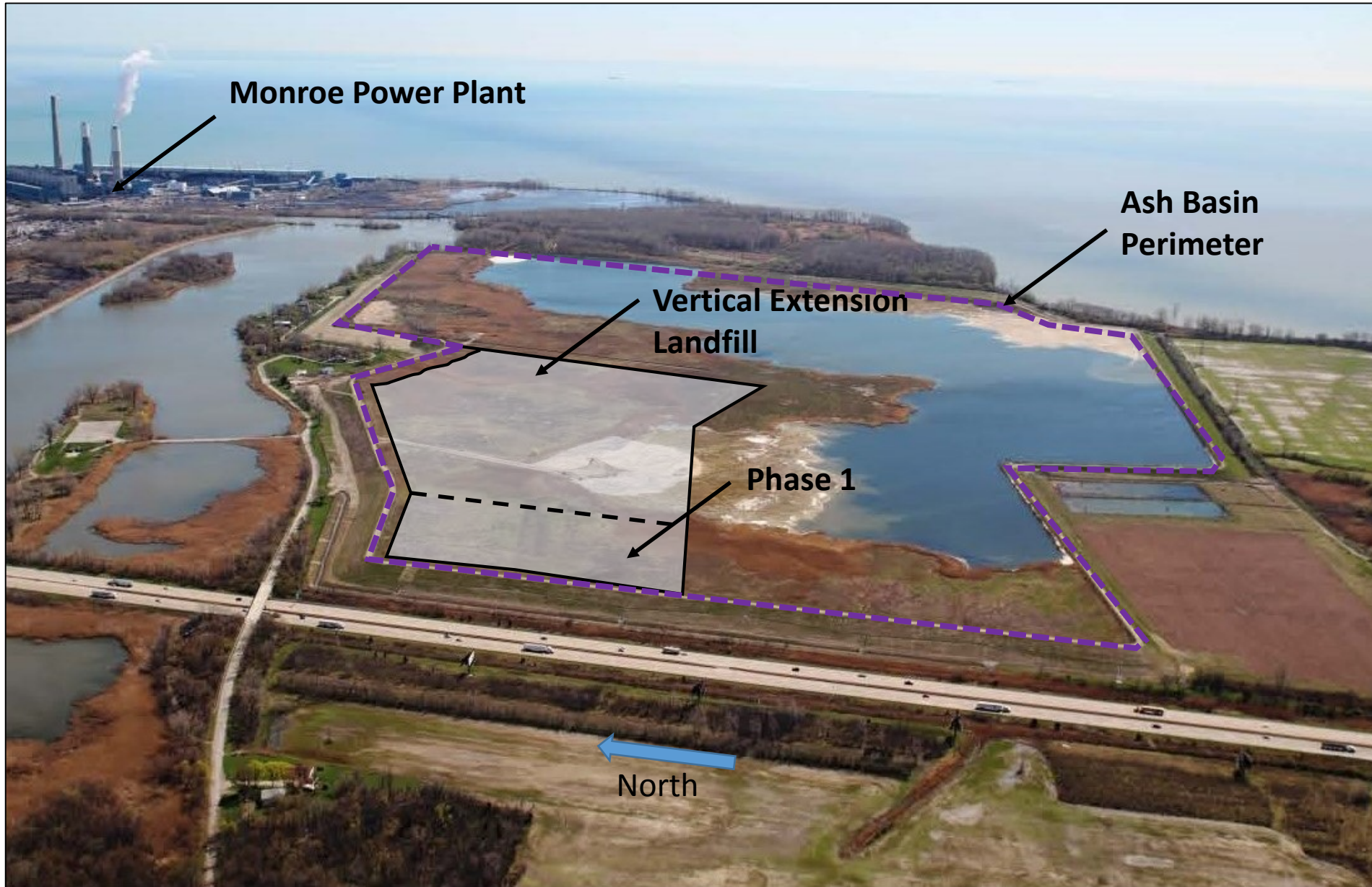
Based on the annual inspection results and review of the available data, the Landfill was designed, constructed, operated and maintained consistent with recognized and generally accepted good engineering standards.

Certified by:


_____ Date 1/13/2016

John Seymour, P.E. Michigan License Number 620103356
Senior Principal Engineer





Geosyntec Consultants

Figure 1: Site Location
Vertical Extension
Landfill
Monroe Power Plant

APPENDIX A

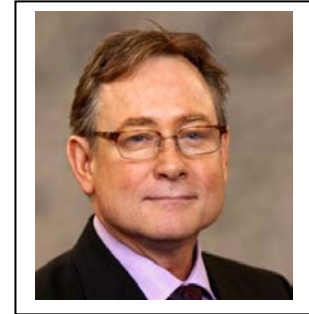
JOHN SEYMOUR, P.E.

**coal combustion residuals management
geoenvironmental engineering
geotechnical engineering**

EDUCATION

M.S., Geotechnical Engineering, University of Michigan, Ann Arbor, Michigan, 1980

B.S., Civil Engineering, Michigan Technological University, Houghton, Michigan, 1976



PROFESSIONAL REGISTRATIONS

Illinois P.E. Number 062-040562

CAREER SUMMARY

Mr. Seymour is a geotechnical engineer with over three decades of experience in the areas of waste containment, site remediation, building foundations, and construction management. He has focused on solid and hazardous waste management and remediation (solid waste/RCRA and Superfund/CERCLA) projects for over 25 years. He has provided professional services in the areas of site characterization, feasibility studies, bench/pilot studies, civil/geotechnical design, construction quality assurance (CQA), disposal facility operation and maintenance, environmental permit applications, project management, project coordination (owner's representative), and expert witness.

His focus over the past 10 years has been on coal combustion residuals management, including: facility siting studies, long term management feasibility studies, landfill design and permit applications, and pond closure design and permit applications.

He has provided coal combustion residuals (CCRs) engineering services, regarding waste management of fly ash, bottom ash and flue gas desulfurization (FGD) waste for impoundments and landfills. These services have included geotechnical and environmental evaluations of waste disposal expansions, operations and closure, disposal permit application preparation for eight U.S coal power generation clients. Overall he has provided relevant consulting engineering services for 7 CCRs impoundments and 14 CCR landfills and provided records review, evaluation and engineering scope of work development for 4 additional CCR impoundments. He has translated some of his experience into 11 technical papers and two final research guidance documents on CCR impoundments (co-investigator), and provided 9 technical presentations at conferences including at conferences focusing on CCR management. He has also provided Phase 1 dam safety surveys for the U.S. Army Corps of Engineers,

including site inspections, for five dams, and dam inspections for a large power plant cooling lake.

Highlights of Mr. Seymour's representative experience include:

Coal Combustion Residuals Project Experience

CCR Rule Compliance Assessments, AEP, Three Plants in Ohio and Kentucky. Mr. Seymour is the project manager to assess CCR Rule compliance for the location requirements and groundwater monitoring systems at three power plants.

Coal Combustion Residuals Rule "Templates", Electric Power Research Institute, National. Project Manager to complete guidance documents for: a) CCR Record Keeping and Website Reporting, b) development of weekly and annual inspection forms and guidance, c) training for the "qualified person" to conduct inspections, d) dust control template, and e) emergency action plan guidance and template.

Sibley Quarry Landfill Closure Options Feasibility Study, DTE Energy, Trenton, Michigan. Mr. Seymour led the effort to conduct a study of closure options under Michigan NREPA Part 115 Type III waste rules and the U.S. EPA 40 CFR 257 CCR rules. Further, he provided a CCR slope stability assessment in 2008, an assessment of CCR slope distress in 2012, and coordinated quarry wall bedrock mapping in 1996.

Monroe Power Plant Ash Disposal Basin, DTE Energy, Monroe, MI. Mr. Seymour is the project leader for a number of projects at this 400 acre fly ash disposal basin. Currently he is acting as the owner's representative to develop a CCR landfill on top of the existing Ash Basin. Previously, he has completed or managed: (i) preliminary engineering study for future disposal, (ii) slope stability assessment and mitigation design to address slope instability, (iii) potential failure mode analysis, (iv) seepage analysis, (v) inspection, monitoring and maintenance program manual, (vi) slope stability study for a vertical expansion, (vii) reliability analysis (also called a probability of failure slope stability analysis) of 2H: 1V slopes, (viii) construction quality assurance (CQA) for a four-year slope mitigation program; and (ix) completing an Emergency Acton Plan.

He managed an FGD gypsum disposal facility preliminary engineering study for new FGD gypsum waste that will be generated at a coal fired electrical generating station. Three options were evaluated: i) disposal at a "greenfield" site that has wetland impacts, ii) disposal over the top of a 400-acre ash pond, and iii) temporary disposal at an offsite coal ash landfill. Further, wet and dry handling options were evaluated.

Mr. Seymour was the project director and engineer of record to conduct an evaluation of slope stability of the side slopes of the earthen containment dike around the ash basin and to assess the potential for a failure due to operating issues. He designed and

implemented an inspection program for a 3.5-mile long, 45-ft (maximum) high fly ash containment dike that led to the development of a remedy for observed sloughing that included flattening some of the slopes, rebuilding some slopes, clearing of vegetation, and relocating a county drain (creek) under the State and U.S. Army Corps of Engineers permitting process. The work was designed to occur over four construction seasons.

In 2009 he was the project director, engineer of record and construction certifying engineer for the relocation of the county drain and temporary emergency erosion mitigation on the side slopes of the ash basin embankment to prepare the site to flatten the slopes of the ash basin embankment; construction was performed in 2010. The work included completing a Clean Water Act Section 404 (filling in waters of the U.S.) permit application, a county soil erosion and sediment control permit application for relocating the drain, slope stability analysis, regrading of the area and construction documents.

In 2010, 2011 and 2012, he was the project director, engineer of record, and construction certifying engineer for flattening of 4,000 ft of the embankment slopes including relocation of a stormwater runoff pump house.

In 2013 he was the project director and construction certifying engineer for the final phase of slope mitigation that includes slope flattening and relocation of construction access ramps.

Mr. Seymour was also the project director for a study of the source of seepage observed at the toe of the embankment.

He also led the completion of a potential failure mode analysis (PFMA) for the entire ash basin disposal facility. He then assisted the owner to address high and medium priority potential failure modes that included completing a global stability assessment that utilized a reliability approach that quantified the probability of failure. He also managed the compilation of an inspection, monitoring and maintenance manual, and documented site improvements.

Coal Combustion Residuals Pond Closure Guidance Documents, Electric Power Research Institute, nationwide. Mr. Seymour is a co-investigator/author and project manager for the completion of two guidance documents relating to CCR pond closures. They include: (i) “Coal Combustion Residuals Ponds- Dewatering and Capping Guidance Document”, and (ii) “Coal Combustion Residuals Pond Closure- Construction over Closed or Closing Ponds Guidance Document”. The documents address many aspects of pond closures including slope stability, safety of working on fly ash ponds, water quality discharge permitting, groundwater remediation, cover/closure design, construction of structures on top of closed ponds, hydrologic analysis, and stormwater erosion and sediment control.

J.C. Weadock CCR Landfill Engineering Study, Consumers Energy Company, Essexville, MI. Mr. Seymour was the project director and engineer of record to conduct an engineering feasibility study of the long term use and closure of a 292 acre ash pond that has been converted to dry disposal. The facility manages bottom ash and fly ash and will manage flue gas desulfurization (FGD) waste. The study is examining five options for long term disposal and closure including implementing the draft CCR rules proposed by USEPA in 2010. Mr. Seymour provided project scoping and is providing project direction and will be the engineer of record for the final submittal.

General James Gavin Power Plant Fly Ash Pond Closure Design, Cheshire, Ohio. Mr. Seymour is the project manager for the conceptual and final design of a 300-acre fly ash disposal pond closure including designing the closure in accordance with the proposed U.S. EPA RCRA Subtitle D (solid waste landfill) regulations (2010). The pond is contained by a 145-ft high earthen dam and the ponded water must be lowered in accordance with Geosyntec's design. A conceptual design was completed followed by the final design. The conceptual design included examining several closure alternatives. The final design includes reshaping the grades of the fly ash by moving over 1,000,000 cu yd of ash and rock, lowering the dam such that no water will be retained after closure, conducting flood hydraulic and stormwater design, design of a new spillway and energy dissipater, and providing pH adjustment to treat runoff for acid mine drainage (AMD). The design includes flood studies and associated hydraulic modeling to safely pass the 100-yr, 24-hr flood event and meet NPDES discharge permit limits for TSS and pH. The PTI was completed under requirements of an NPDES permit modification. Construction documents are under preparation.

General James Gavin Power Plant CCR Landfill Design, Cheshire, Ohio. Mr. Seymour managed the design and the Permit to Install (PTI) application for a 46,000,000 cu yd residual waste landfill for the solid waste permit application under existing OEPA rules and incorporated relevant portions of the U.S. EPA proposed (2010) RCRA Subtitle D regulations. An engineering feasibility study was first completed to select either a Greenfield site or a site that included a lateral expansion over an adjacent fly ash pond and vertically over the existing landfill. The lateral expansion over the fly ash pond was selected. The work to complete the PTI included: a comprehensive geotechnical and hydrogeological investigation, geophysical investigation to locate underground mines, assessment of strength of all geologic and waste materials, slope stability, settlement analysis, liquefaction analysis of the ponded fly ash in the subgrade, leachate system collection and treatment design, surface water hydraulic analyses and leachate pond design for the 25-year, 24-hour storm event, preparation of a site investigation report, preparation of a hydrogeologic study report, preparation of a settlement and stability analysis report, construction and operations

information report, final closure and post closure plan, groundwater monitoring plan, the quality assurance/quality control plan including specifications and the PTI application report. The PTI application was submitted in August 2011 and included four volumes and 67 design drawings and the OEPA provided a verbal approval in October 2012.

R. Paul Smith CCB Landfill Expansion and Ash Pond Cleanout, Allegheny Energy Supply, Berkeley County, WV. Mr. Seymour was the project manager and engineer of record for the design and construction quality assurance of a coal combustion byproducts landfill for a coal-fired power plant that is located in Maryland with the landfill located in adjacent West Virginia. He led the completion of an evaluation of the most economical landfill expansion approach, which considered vertical and lateral expansion options. The selected method of expansion included three elements: lateral expansion using a composite liner system, vertical expansion using a mechanically stabilized earth (MSE) retention system, and a vertical expansion over the top of the existing disposal area.

He managed the design of the landfill for the solid waste permit application and construction bid package that included the design for the cleanout of ash Pond 3. He then managed the construction quality assurance (CQA) for the construction of the Phase A portion and prepared the construction certification report obtaining approval of WVDEP of each layer (subgrade, groundwater underdrain, liner, and leachate collection layer) within 5 days of submittal of completion documentation. He most recently was the project director and engineer of record for the permit renewal application.

Cardinal Plant CCR Landfill Studies, American Electric Power, Brilliant, Ohio. He completed a feasibility study to assess the potential to develop a new FGD waste landfill over an existing fly ash disposal impoundment at a coal-fired power plant. The feasibility study included utilization of mine spoil as a building product for low permeability liners, examination of foundation settlement and liquefaction potential for this landfill that was to be located over 170 ft thick (maximum) layer of saturated coal ash in a “cross valley fill” that was contained by an earthen dam approximately 150-ft high.

PROFESSIONAL EXPERIENCE

Geosyntec Consultants, Chicago, IL, 2001–present

URS Corporation, Detroit, MI, 1997–2001

Woodward-Clyde Consultants (later URS), Chicago, IL and Detroit, MI, 1980-1997

Townsend and Bottum, Ann Arbor, MI, 1978-1979

Stone & Webster, Shippingport, PA, 1976-1978

AFFILIATIONS

American Society of Civil Engineers
Midwest Coal Ash Association
Society of American Military Engineer

REPRESENTATIVE PUBLICATIONS

- 15-08 “EPA’s Coal Combustion Residuals Rule: Review of Applicability, Exemptions, and Technical Requirements”, American Bar Association Section of Environment, Energy, and Resources, Vol. 15, No. 1, August 2015, Mike Houlihan, John Seymour, and Steven Burns
- 15-05 “Geotechnical Considerations for Surface Impoundment Closure to Meet the CCR Rule & Avoid Compliance and Constructability Pitfalls”, Technical Short Course Teacher at the World of Coal Ash conference, Nashville, TN.
- 15-01 “Conditions of Coal Ash Embankments”, at the U.S. Society on Dams Conference, April 2015 I Louisville, KY, John Seymour, P.E., Omer Bozok, Amanda Hughes, Ph.D., Brad Bodine, P.E.
- 14-05 “Coal Combustion Residuals Pond Closure, Guidance for Dewatering and Capping”, EPRI Technical Report 3002001117, Palo Alto, CA, J. Seymour, W. Steier, C Li, P Sabatini, M Lodato, M. Bardol, M. Gross.
- 14-05 “Coal Combustion Residuals Pond Closure, Guidance for Construction Over Closed or Closing Ponds”, EPRI Technical Report 3002001143, Palo Alto, CA, P. Sabatini, R. Kulasingam, J. Seymour,
- 13-04 “Challenges of Closing Large Fly Ash Ponds”, at the World of Coal Ash Conference, Lexington, Kentucky, April 2013. Lead author and presenter.
- 11-05 “Advances in Design of Landfills over CCR Ponds and CCR Landfills”, Proceedings from the World of Coal Ash conference, Denver, CO, John Seymour, P.E. and Michael F. Houlihan, P.E. BCEE, May 2011. Lead author and presenter.

INVITED PRESENTATIONS

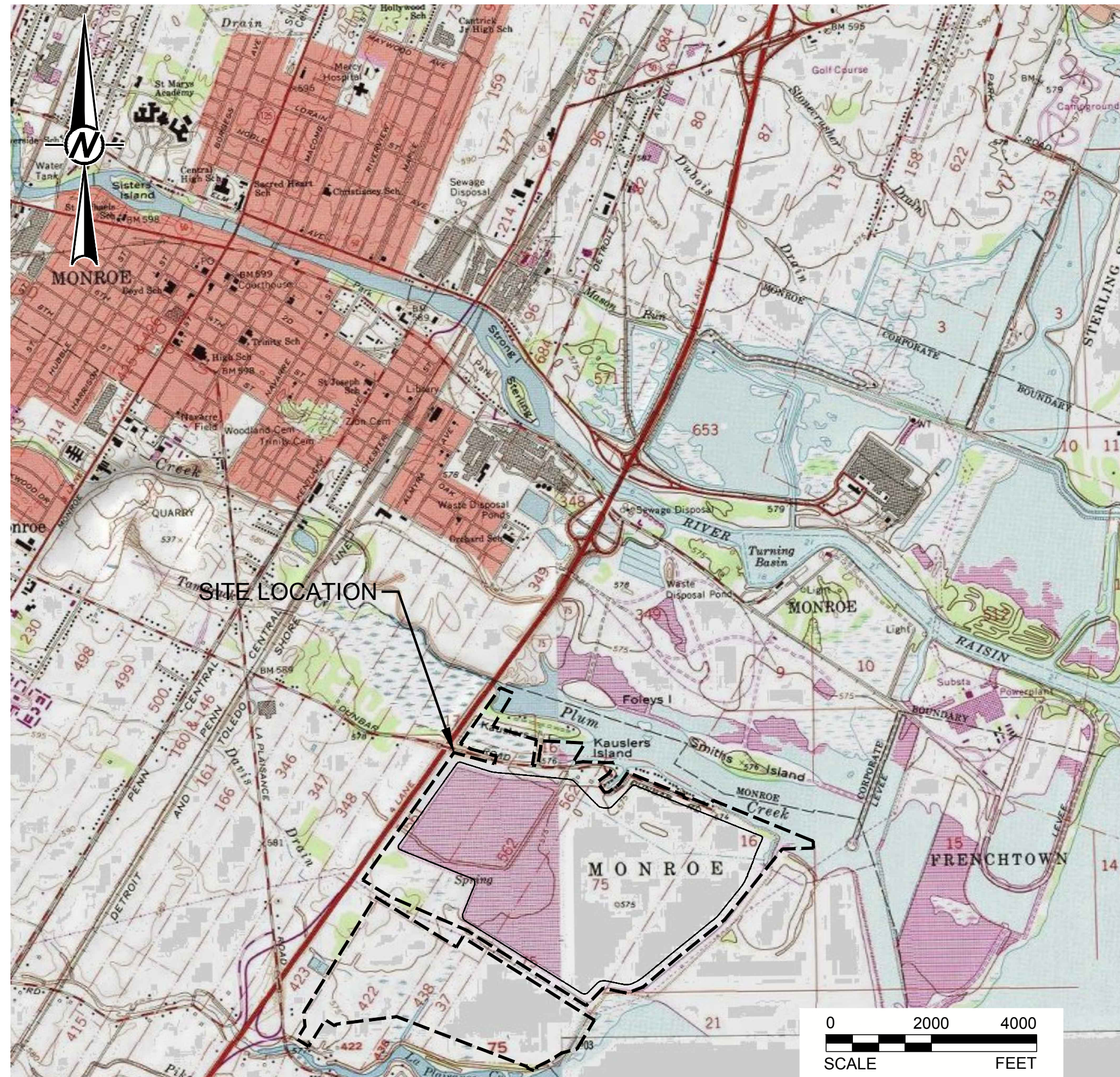
He has presented the following papers or provided these presentations:

- 15-10 “Response to the New Coal Combustion Residuals (CCR) Rule”, to the American Bar Association Energy, Environment and Resources Annual Meeting, Chicago, IL.

- 15-06 “Slope Stability Considerations under the CCR Rule” and “Inspections and Monitoring of CCR Surface Impoundments”, to the Electric Power Research Institute Program 49 Companies, Bar Harbor, ME.
- 15-05 “Geotechnical Considerations for Surface Impoundment Closure to Meet the CCR Rule & Avoid Compliance and Constructability Pitfalls”, Technical Short Course Teacher at the World of Coal Ash conference, Nashville, TN.
- 15-04 “Conditions of Coal Ash Embankments”, at the U.S. Society on Dams Conference, April 2015 I Louisville, KY, John Seymour, P.E., Omer Bozok, Amanda Hughes, Ph.D., Brad Bodine, P.E.
- 14-03 “CCB Wet Pond Assessment, Closure, and Redevelopment”, presentation provided to FirstEnergy, March, 2014.
- 13-12 “CCR Pond Closures: Major Difficulties and Solutions”, presentation to the Utility Solid Waste Activities Group, Washington, D.C., December, 2013.
- 13-11 “CCR Pond Closures: Major Difficulties and Solutions”, presentation and workshop for the Tennessee Valley Authority, Chattanooga, Tennessee, November 2013.
- 13-04 Presentation of: “Challenges of Closing Large Fly Ash Ponds”, at the World of Coal Ash Conference, Lexington, Kentucky, April 2013.
- 13-04 “Hot Topics Regarding Coal Combustion Residuals Management, presentation to Winston & Strawn Environmental Group, Chicago, Illinois, April 2013.
- 12- 08 “Landfills over CCR Ponds”, Webinar with CETCO serving over 140 participants, August 2012, repeated in September 2012.
- 11-05 Presentation of: “Advances in Design of Landfills over CCR Ponds and CCR Landfills”, at the World of Coal Ash conference, Denver, CO, May 2011.
- 09-04 “Geotechnical Design Considerations for Landfill Construction Over an Ash Pond”, World of Coal Ash, Lexington, KY, May 2009

APPENDIX B

DTE ENERGY MONROE FLY ASH BASIN 2015 PHASE 1 RECORD DRAWINGS



Prepared for:
DTE ENERGY
One Energy Plaza
Detroit, MI 48226

Prepared by:
Golder Associates Inc.
15851 S. US 27 Suite 50
Lansing, Michigan USA 48906

INDEX OF DRAWINGS			
Sheet Number	Drawing Title	Current Revision	Date
1	Title Sheet	0	
2	Legend, References and General Notes	0	
3	Site Plan	0	
4	Record Top of Subgrade Plan	0	
5	Record Pore Water Relief Piping Plan	0	
6	Record Pore Water Relief System and Berm Plan	0	
7	Construction Control / QA/QC Points	0	
8	Record Monitoring Locations for Phase 1	0	
9	General Details - Sheet 1	0	
10	General Details - Sheet 2	0	

RECORD DRAWING

CLIENT
DTE ENERGY
MONROE POWER PLANT
MONROE, MI

CONSULTANT



YYYY-MM-DD	2015-09-10
PREPARED	JJS
DESIGN	JJS
REVIEW	JJS
APPROVED	DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
TITLE SHEET








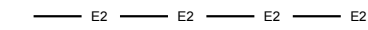

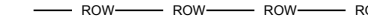

















PROJECT No.
1521809B

CONTROL







Rev.

FIGURE
1

LEGEND

-  PROPERTY BOUNDARY
-  ASH BASIN EXISTING TOPOGRAPHY (1' AND 5' CONTOURS)
-  WATER BOUNDARY
-  FENCE LINE
-  ELECTRIC TOWER
-  ELECTRIC POLE
-  UNDERGROUND ELECTRIC LINE
-  CONSUMERS ENERGY ELECTRIC LINE
-  ITC ELECTRIC LINE
-  RIGHT OF WAY
-  DRAINAGE DIRECTION
-  SAMPLE LOCATION
-  DECOMMISSIONED SLURRY PIPELINES
-  ACTIVE SLURRY PIPELINES
-  WETLAND
-  STRUCTURE (RESIDENCE, BUSINESS)
-  CULVERT
-  BENCHMARK LOCATION
-  WATER LINE
-  VEHICLE CROSSING
-  PROPOSED DRAINAGE CHANNEL
-  PROPOSED PERFORATED, FILTER SOCKED, CORRUGATED PLASTIC PIPE (6" OR 8"Ø)
-  AREA OF CLAY COVER
-  AREA OF FILL TICK MARK
-  AREA OF CUT TICK MARK
-  CONTROL POINT
-  CULVERT

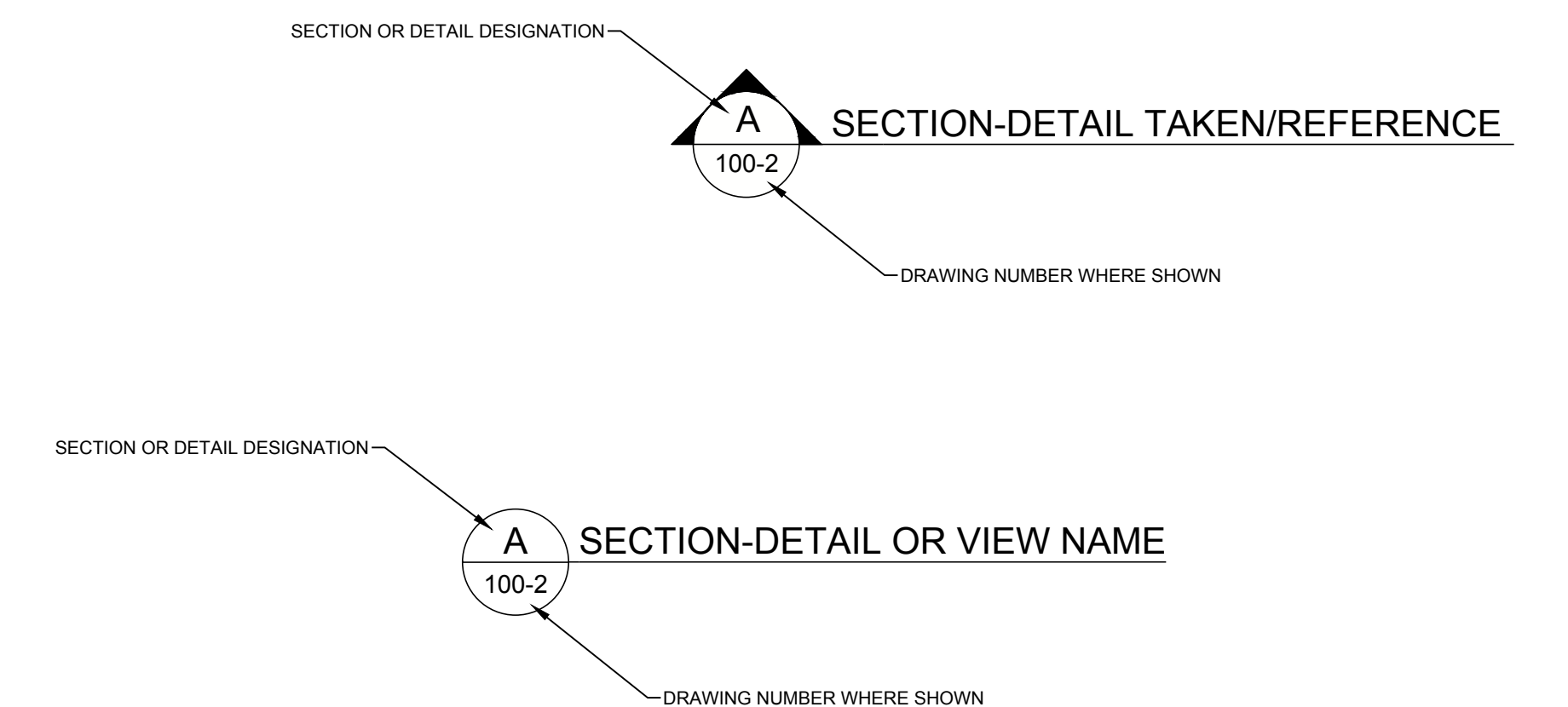
MATERIALS LEGEND

-  SLUICED FLY ASH
-  BOTTOM ASH OR EQUIVALENT
-  8 oz/sy GEOTEXTILE
-  LOW PERMEABILITY SOILS COVER MATERIAL
-  STRUCTURAL FILL
-  TOPSOIL

GENERAL NOTES

1. EXISTING TOPOGRAPHY IS AN AMALGAM OF GRADES FROM 2009 BASE MAP (DRAWING 6SE-0695-070-REV(B)) AND AS-BUILT GRADES FROM MITIGATED SECTIONS OF THE EMBANKMENT, PROVIDED BY DTE, DRAWING CREATED BY GEOSYNTEC CONSULTANTS, DATED 02/08/2013.
2. HORIZONTAL GRID COORDINATE SYSTEM UNITS ARE IN FEET AND REFERENCED TO MICHIGAN SOUTH STATE PLANE COORDINATES SYSTEM (NAD83). ELEVATIONS ARE IN FEET AND REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD29). NGVD29 DATUM IS 1.47 FT HIGHER THAN THE PLANT DATUM.
3. AREA OF CLAY COVER ADAPTED FROM "ATTACHMENT A" OF THE DTE ELECTRIC COMPANY SOLID WASTE OPERATING LICENSE APPLICATION, DATED DECEMBER 3, 2014.

SECTION, DETAIL AND VIEW DESIGNATIONS



RECORD DRAWING

CLIENT
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MONROE, MI

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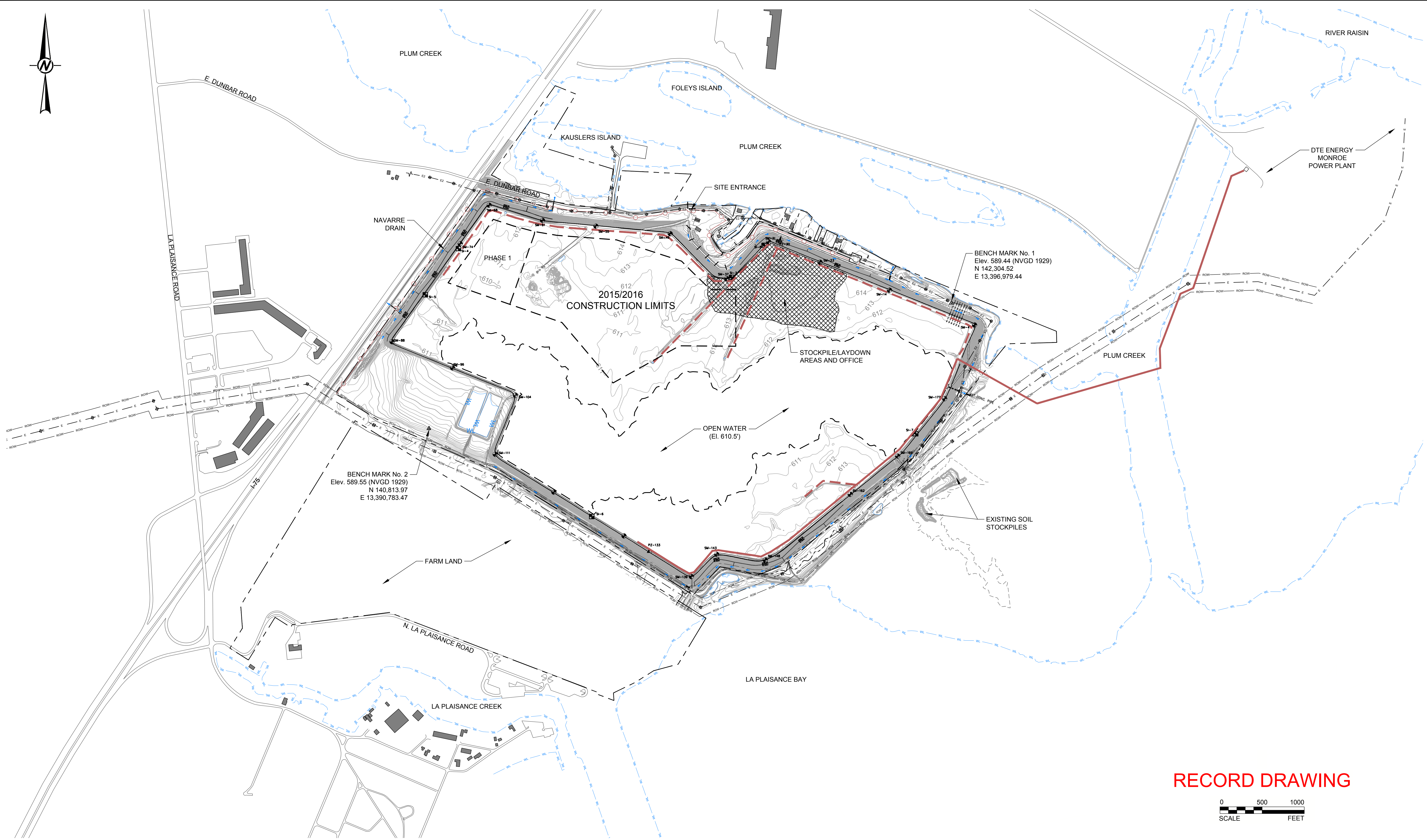
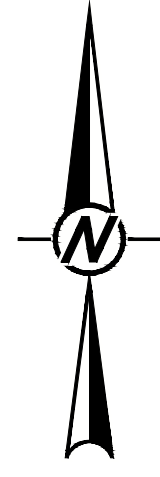


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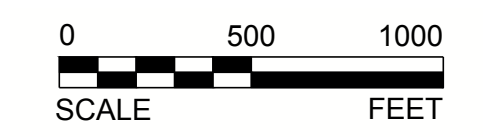
PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
LEGEND, REFERENCES AND GENERAL NOTES

PROJECT No.	CONTROL	Rev.	FIGURE
1521809B			2



RECORD DRAWING



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REVIEW	JJS
APPROVED	DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
SITE PLAN

PROJECT No.
1521809B

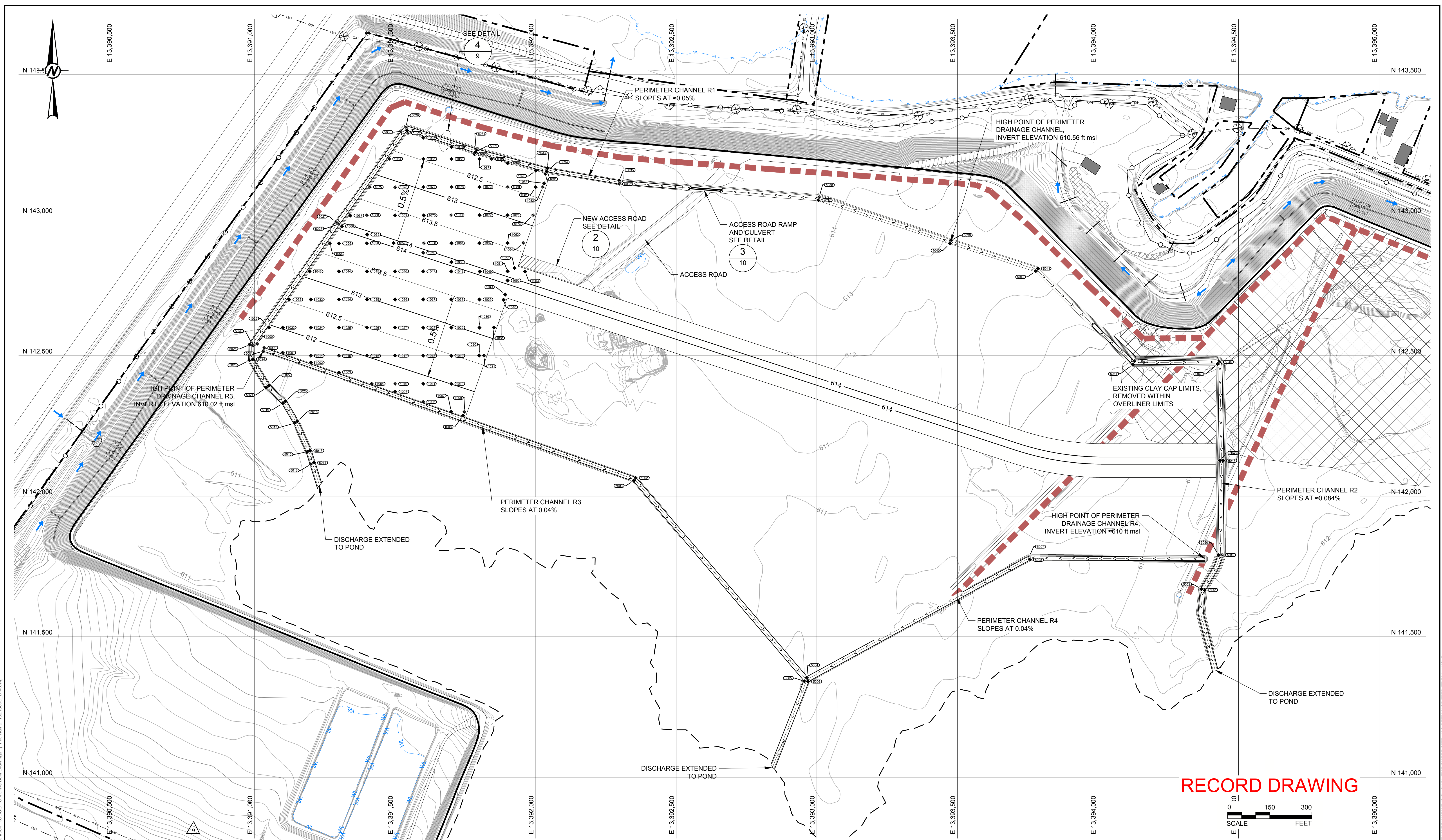
CONTROL

Rev.

FIGURE
3

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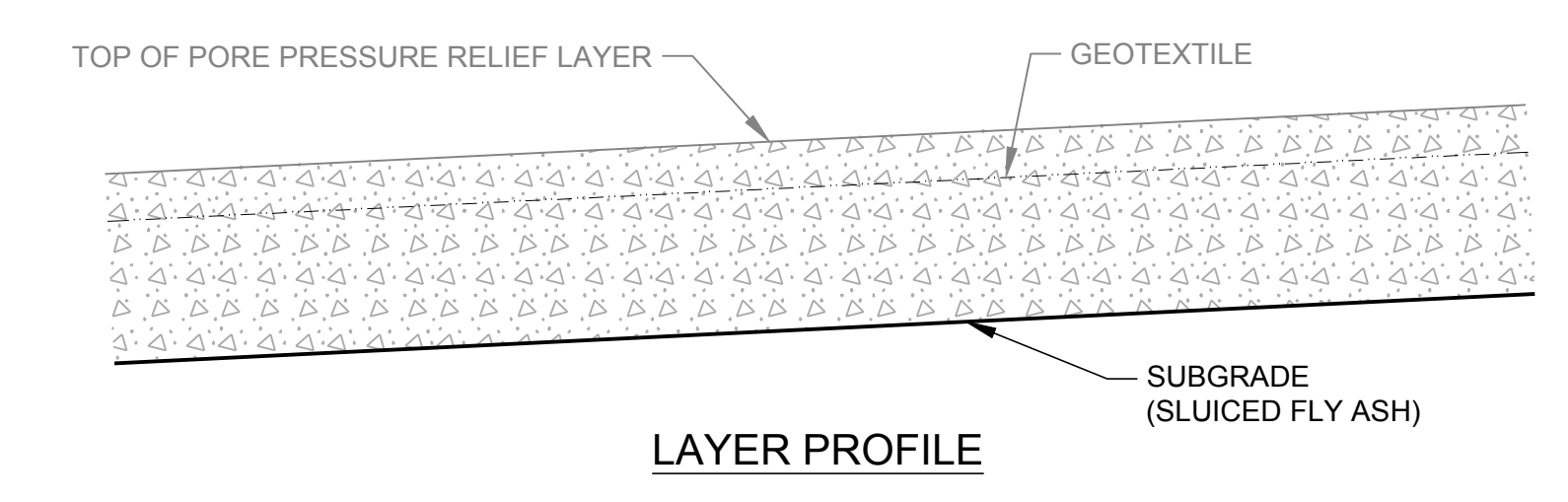
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RECORD DRAWING

0 150 300
SCALE FEET

- NOTE(S)**
1. ABANDONED PIPING WITHIN LIMITS OF SUBGRADE WAS REMOVED.
 2. CLAY COVER WITHIN LIMITS OF SUBGRADE WAS REMOVED.



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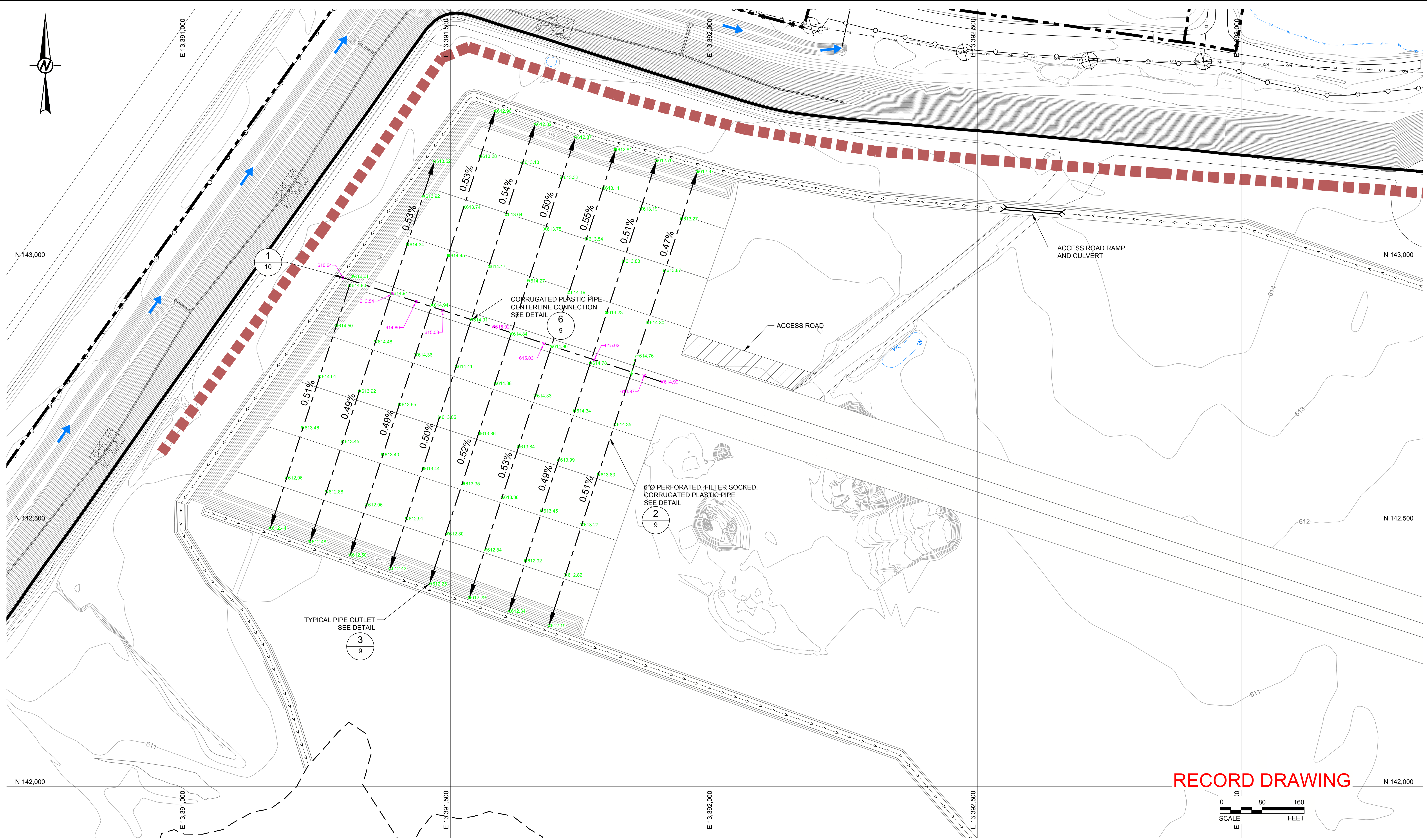
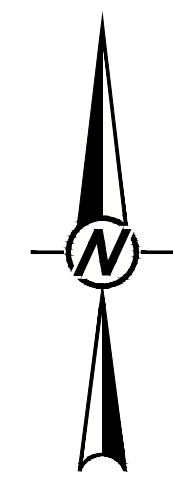
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DESIGN	JJS
REVIEW	JJS
APPROVED	DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

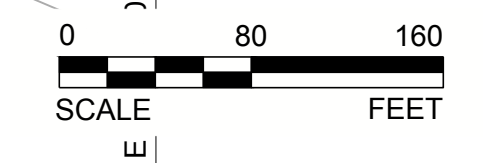
TITLE
RECORD TOP OF SUBGRADE AND SWALE PLAN

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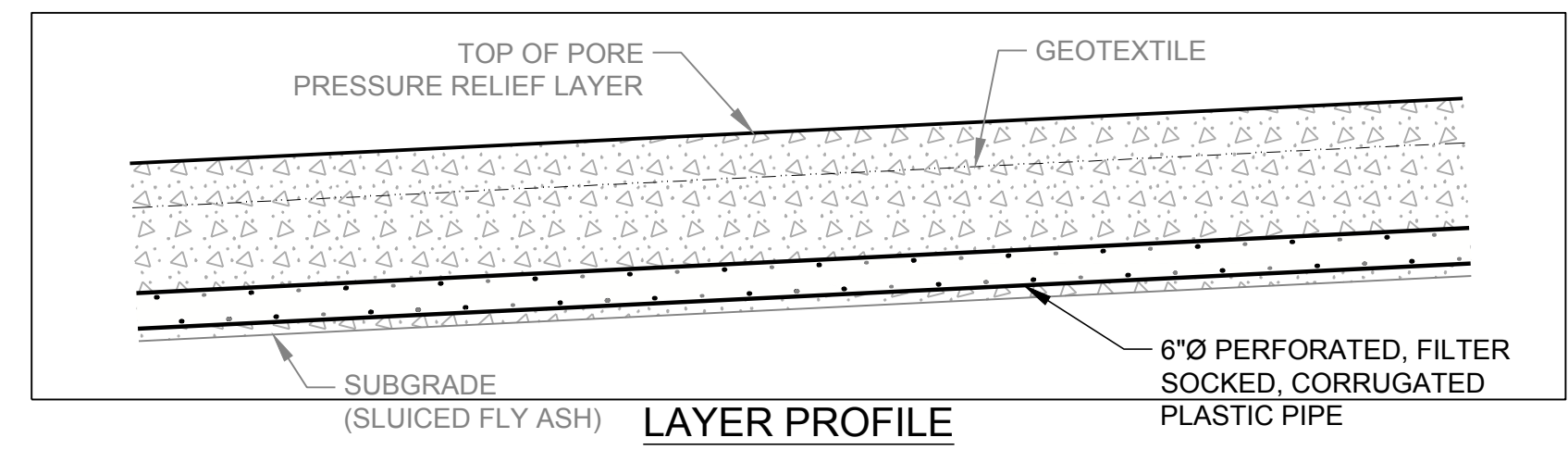


RECORD DRAWING



NOTE(S)
1. RECORD POINTS PROVIDED BY KemTech, HOWEVER, CERTAIN POINTS WERE UPDATED BY EAGLE EXCAVATING USING A GPS SYSTEM, FOLLOWING ADDITIONAL FIELD WORK.

LEGEND
AS BUILT 6" PIPE ELEVATION
AS BUILT 8" PIPE ELEVATION



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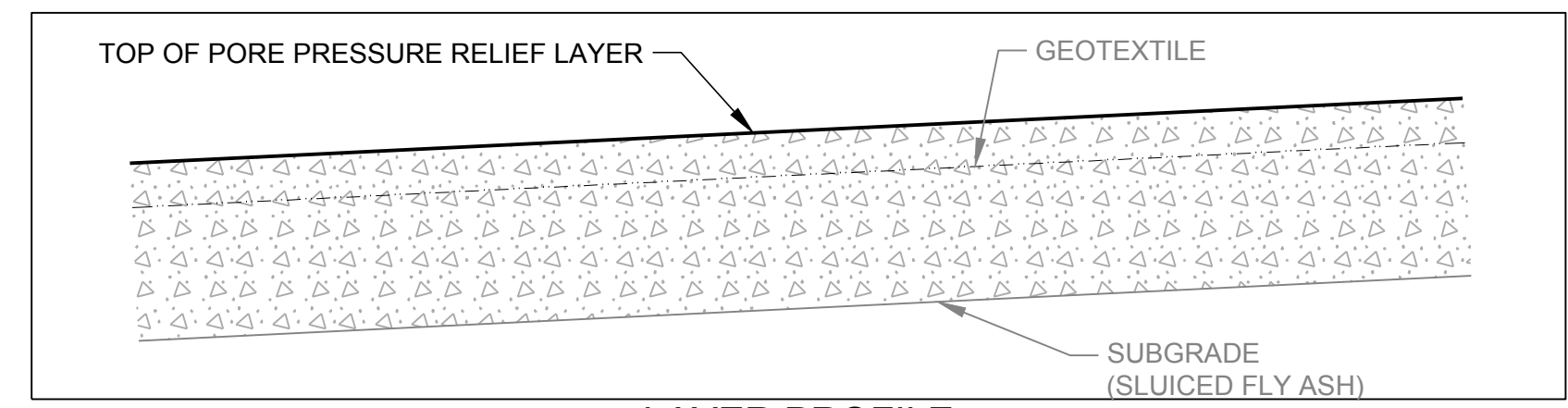
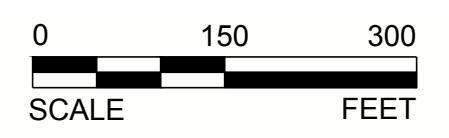
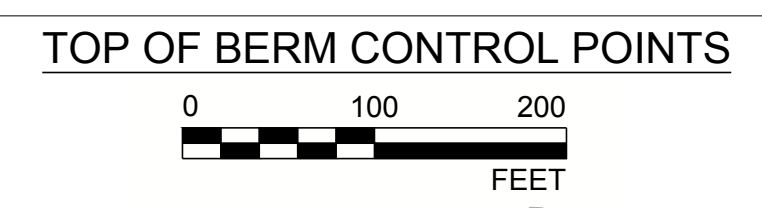
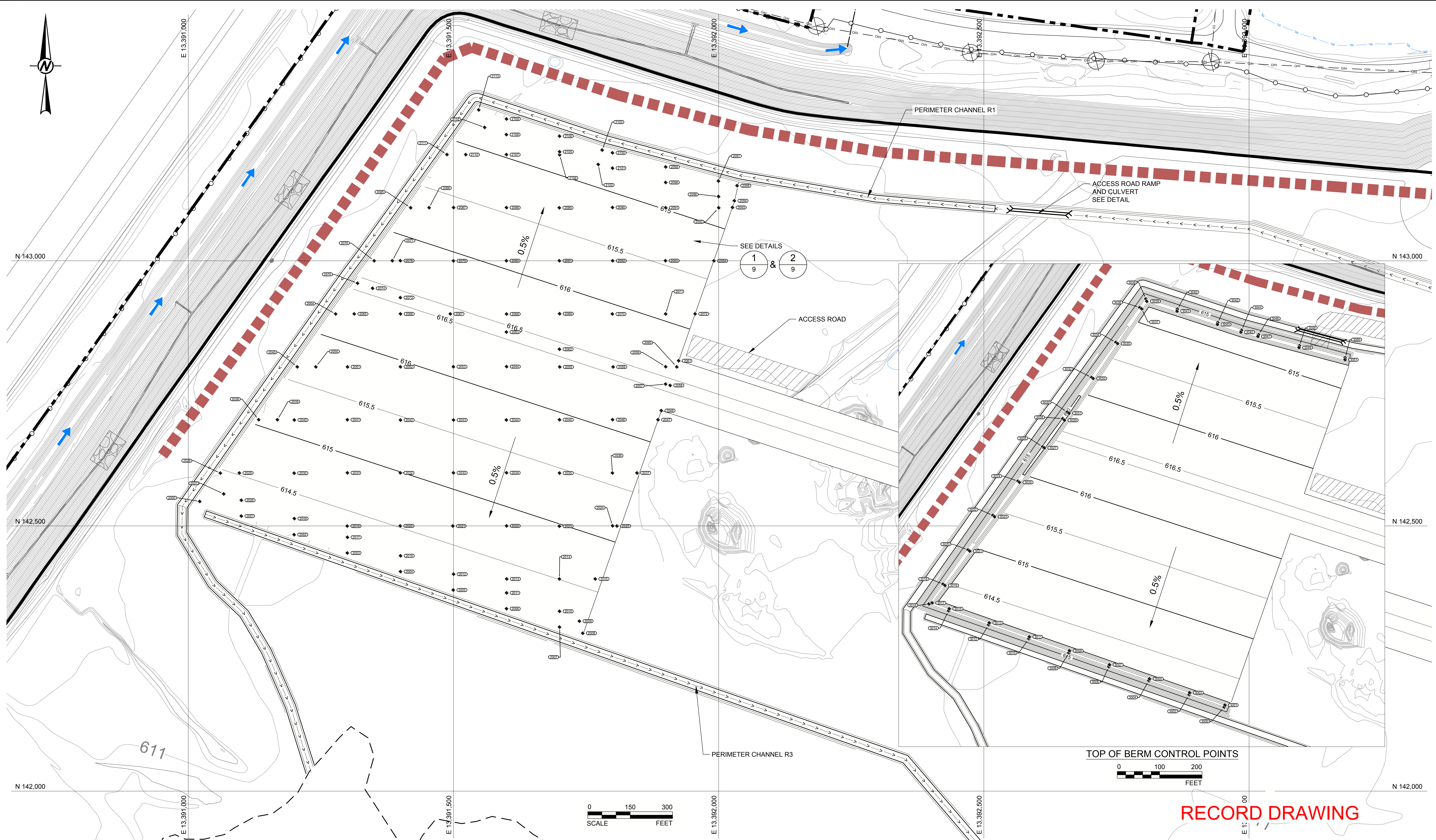
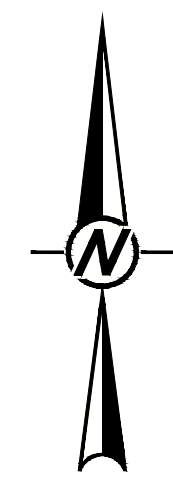
PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
RECORD PORE WATER RELIEF PIPING PLAN

PROJECT No. 1521809B CONTROL Rev. FIGURE 5

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LAYER PROFILE

RECORD DRAWING

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MONROE, MI
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PREPARED JJS
DESIGN JJS
REVIEW JJS
APPROVED DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
RECORD PORE WATER RELIEF SYSTEM AND BERMPAN

PROJECT No.
1521809B

CONTROL

Rev.

FIGURE
6

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2015 SUBGRADE CONSTRUCTION CONTROL POINTS

Table with 6 columns: POINT NUMBER, NORTHING, EASTING, DESIGN ELEVATION, RECORD ELEVATION, DIFFERENCE ±. Contains 105 rows of data for subgrade construction control points.

2015 TOP OF PORE PRESSURE RELIEF LAYER CONSTRUCTION CONTROL POINTS

Table with 6 columns: POINT NUMBER, NORTHING, EASTING, DESIGN ELEVATION, RECORD ELEVATION, DIFFERENCE ±. Contains 105 rows of data for top of pore pressure relief layer construction control points.

2015 TOP OF PERIMETER BERM CONSTRUCTION CONTROL POINTS

Table with 6 columns: POINT NUMBER, NORTHING, EASTING, DESIGN ELEVATION, RECORD ELEVATION, DIFFERENCE ±. Contains 105 rows of data for top of perimeter berm construction control points.

2015 INVERT OF PERIMETER DITCHES CONSTRUCTION CONTROL POINTS

Table with 6 columns: POINT NUMBER, NORTHING, EASTING, DESIGN ELEVATION, RECORD ELEVATION, DIFFERENCE ±. Contains 105 rows of data for invert of perimeter ditches construction control points.

Table with 6 columns: POINT NUMBER, NORTHING, EASTING, DESIGN ELEVATION, RECORD ELEVATION, DIFFERENCE ±. Contains 105 rows of data for invert of perimeter ditches construction control points.

NOTE(S)

- 1. CERTAIN SWALE SURVEY POINTS WERE BEING OBTAINED AS OF THE WRITING OF THIS REPORT.
2. POINT 1013 SURVEYED BY EAGLE EXCAVATING USING A GPS SYSTEM, FOUND TO BE WITHIN TOLERANCE, HOWEVER NOT RECORDED; DESIGN SUBGRADE ELEVATION USED.
3. BERM CONSTRUCTION TERMINATED SHORT OF DESIGN, THEREFORE POINTS 3000 AND 3001 ARE LOWER THAN DESIGN ELEVATION.
4. SUBGRADE ELEVATIONS LOWER THAN 0.10 FEET BELOW GRADE WERE CONSIDERED ACCEPTABLE DUE TO THE BACKFILLING OF GRANULAR SOILS WITHIN THE PORE WATER RELIEF LAYER.

RECORD DRAWING

CLIENT
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MONROE POWER PLANT
MONROE, MI
CONSULTANT

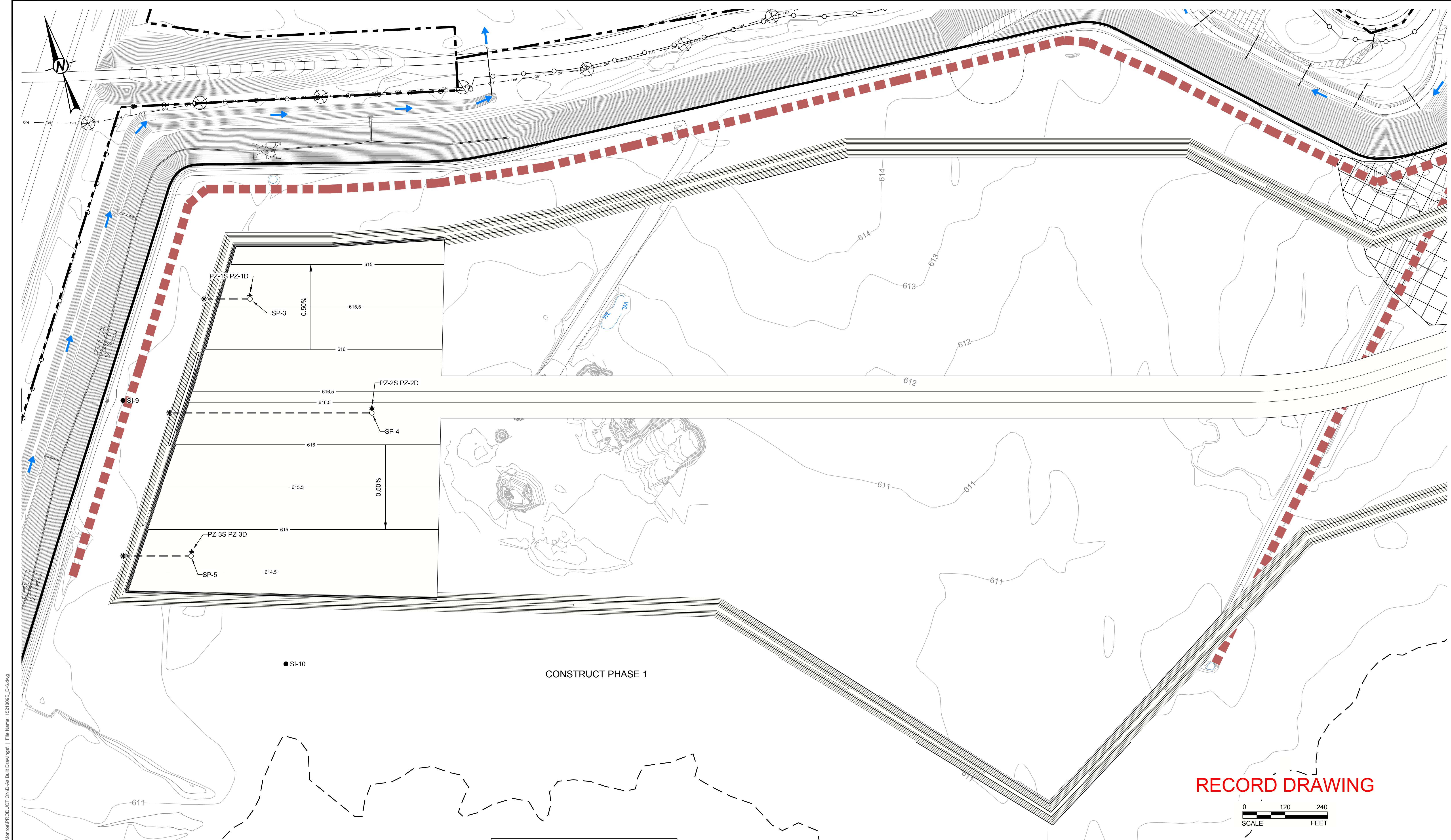
PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

YYYY-MM-DD 2015-09-10
PREPARED JJS
DESIGN JJS
REVIEW JJS
APPROVED DML

TITLE
CONSTRUCTION CONTROL / QA/QC POINTS/

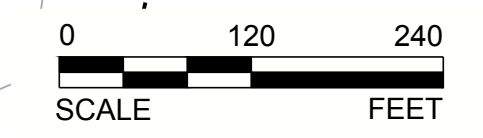
PROJECT No. 1521809B CONTROL Rev. FIGURE 7





CONSTRUCT PHASE 1

RECORD DRAWING



- LEGEND**
- SI-1 SLOPE INCLINOMETER
 - ▲ PZ-1D
▲ PZ-1S VIBRATING WIRE PIEZOMETER (VWP) PAIR (DEEP & SHALLOW)
 - SP-1 SETTLEMENT PLATE
 - * REMOTE (CABLED) DATA LOGGER LOCATION FOR VWP
 - - - DATA LOGGER CABLE

RECORD INSTRUMENTATION INFORMATION			
INSTRUMENT IDENTIFICATION	NORTHING	EASTING	ELEVATION
PZ-1S PZ-1D	143,132.58	13,391,553.77	614.71
PZ-2S PZ-2D	142,791.36	13,391,744.99	615.92
PZ-3S PZ-3D	142,601.23	13,391,236.06	614.26
SI-10	142,280.24	13,391,364.86	612.45
SI-9	142,989.72	13,391,192.71	611.28
SP-3	143,124.35	13,391,551.76	615.34
SP-4	142,779.81	13,391,741.28	616.31
SP-5	142,591.55	13,391,231.59	614.76

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MONROE POWER PLANT
MONROE, MI
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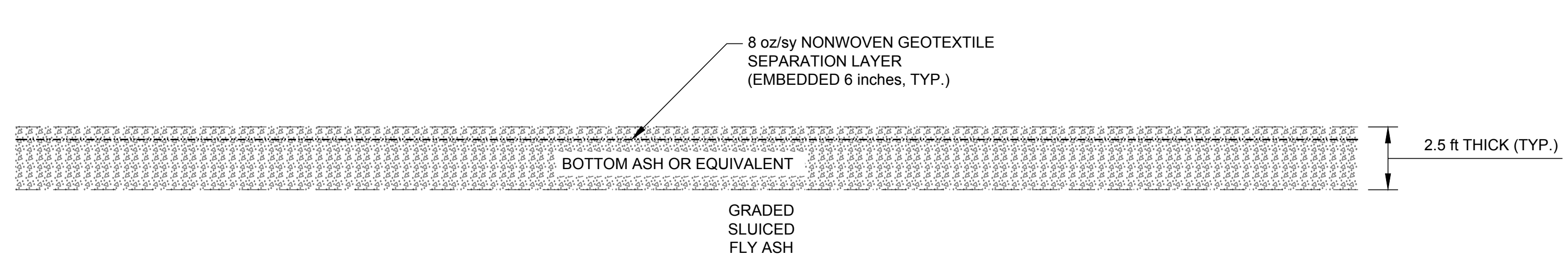
YYYY-MM-DD	2015-09-10
PREPARED	JJS
DESIGN	JJS
REVIEW	JJS
APPROVED	DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

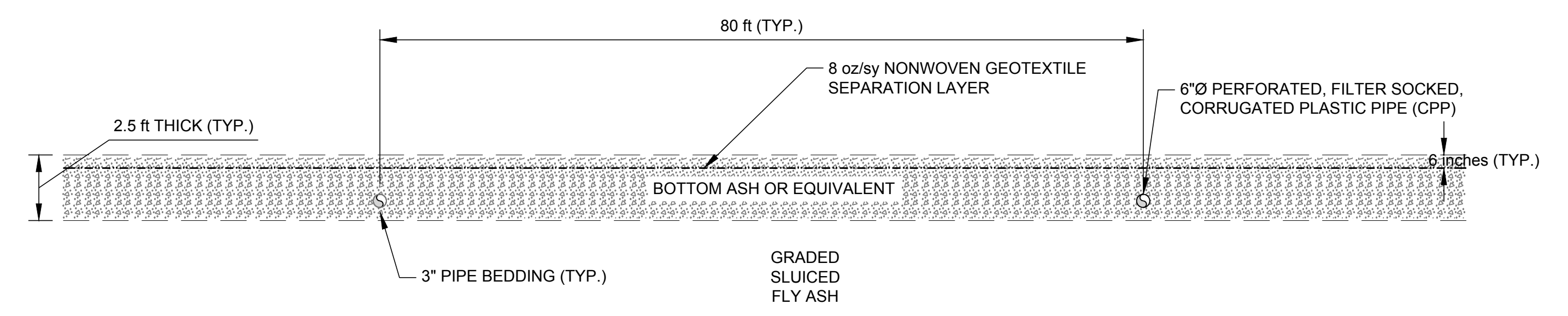
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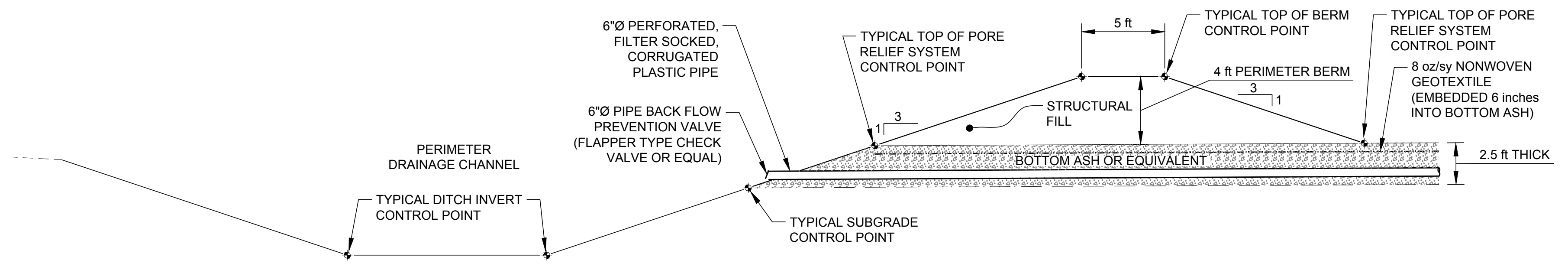
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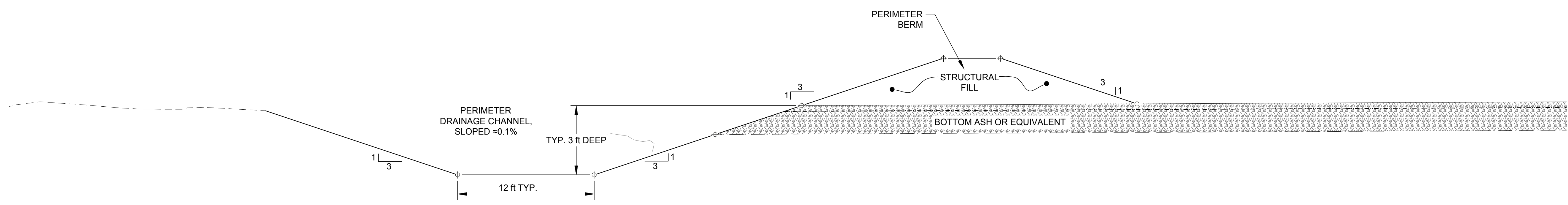
1 PORE RELIEF SYSTEM BASE LINER
9



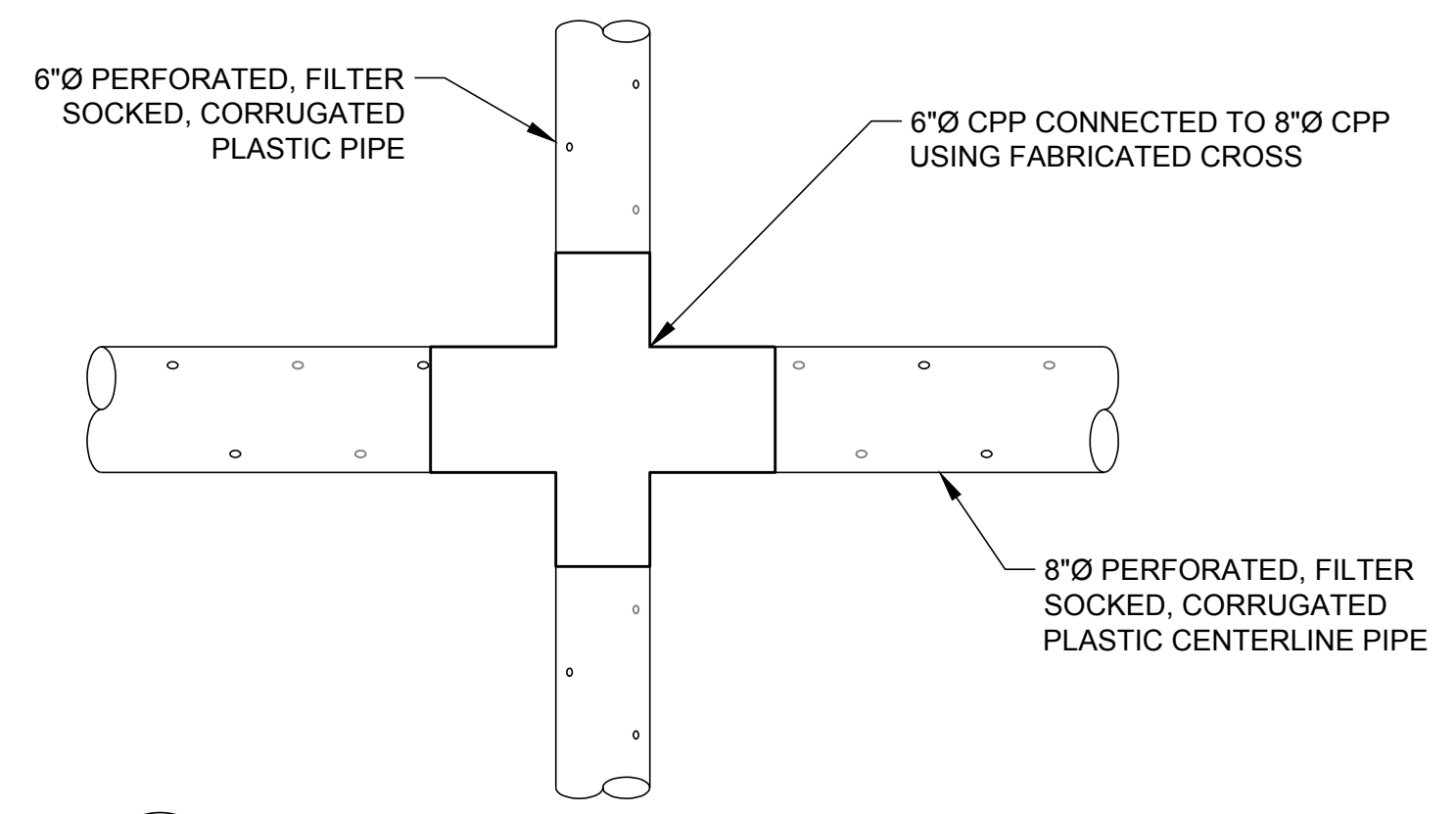
2 PORE RELIEF SYSTEM BASE LINER w/PIPES
9



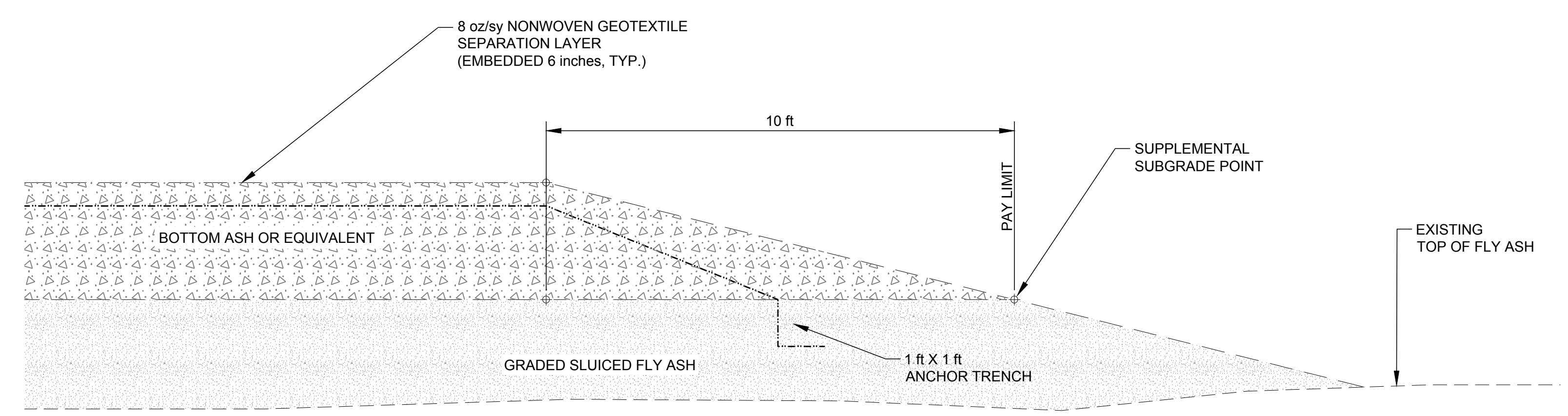
3 PERIMETER BERM WITH NORTH-SOUTH PORE RELIEF PIPING SHOWN
9



4 PERIMETER BERM WITHOUT PIPING
9



6 CORRUGATED PLASTIC PIPE CENTERLINE CONNECTION
9



5 TYPICAL LEADING EDGE DETAIL
9

RECORD DRAWING

CLIENT
DTE ENERGY
MONROE POWER PLANT
MONROE, MI

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

CONSULTANT	YYYY-MM-DD	2015-09-10
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	DESIGN	JJS
	REVIEW	JJS
	APPROVED	DML

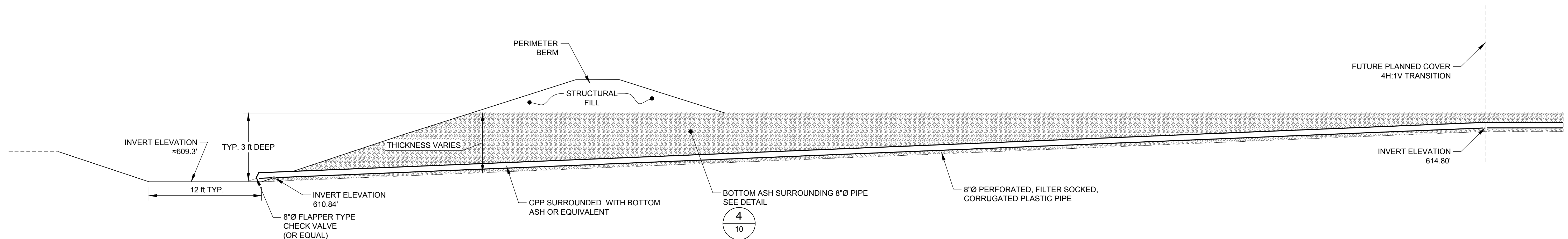
TITLE
GENERAL DETAILS
SHEET 1

PROJECT No.	CONTROL	Rev.	FIGURE
1521809B			9

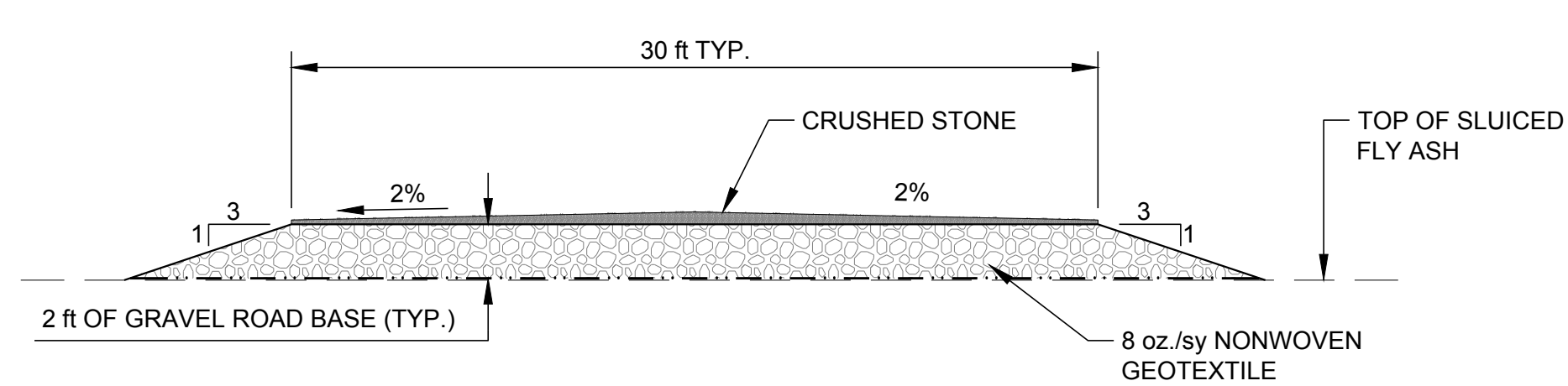


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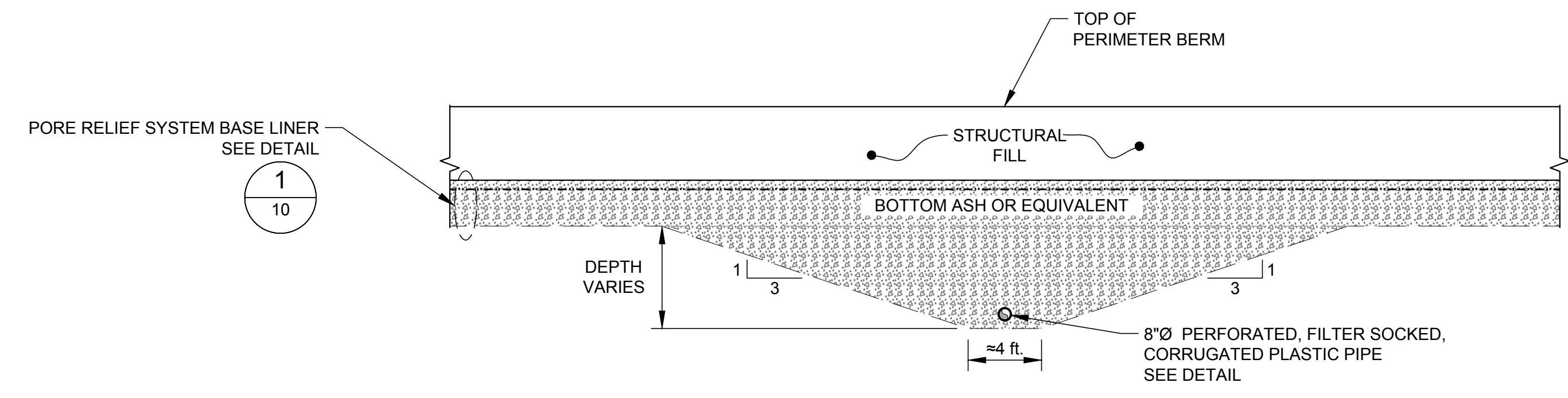
IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI D



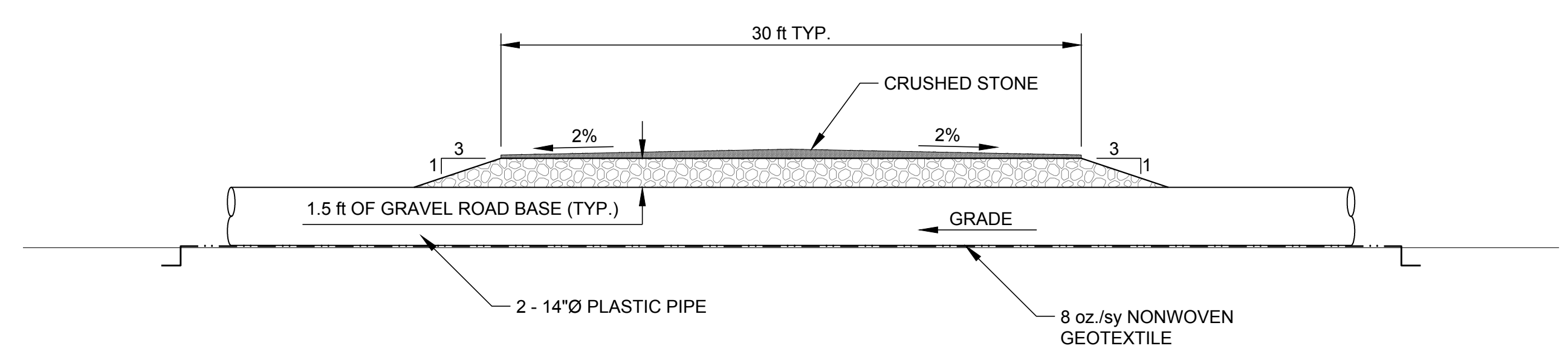
1 PERIMETER BERM WITH WESTERN CENTRAL PORE PRESSURE RELIEF PIPE SHOWN



2 TYPICAL NEW ROAD SECTION



4 8" PIPE TRENCH PAST 4H:1V SLOPE



3 TEMPORARY ACCESS ROAD RAMP AND CULVERT DETAIL

RECORD DRAWING

CLIENT
DTE ENERGY
MONROE POWER PLANT
MONROE, MI
CONSULTANT



YYYY-MM-DD 2015-09-10
PREPARED JJS
DESIGN JJS
REVIEW JJS
APPROVED DML

PROJECT
MONROE POWER PLANT ASH BASIN
2015 PHASE 1 RECORD DRAWINGS

TITLE
GENERAL DETAILS
SHEET 2

PROJECT No.
1521809B

CONTROL

Rev.

FIGURE
10

Path: \\laning\CAD\Projects\1521809B_DTE_Monroe\PRODUCTION\As-Built_Drawing\1 File Name: 1521809B_D-5.dwg

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI D

APPENDIX C



CCR Landfill
Weekly Inspection Report

Name of Landfill: Monroe Vertical Extension Landfill
Qualified P.E.: John Seymour
MDEQ Landfill ID:
Date: 12/18/2015 Time: 9- 11 AM
Owner: DTE Energy
Weather: Sunny; 32 Deg; 10 mph wind
Operator: Headwaters
Site Conditions: V. Good. Relativley dry and easily accessible

I. Landfill Condition

- 1. Describe operations in the landfill: Disposal of fly ash, bottom ash, economizer ash, FGD sludge
Other:
2. Are any stormwater ditches obstructed? X Yes ___ No
If 'Yes', describe (type of debris, reason for obstruction, etc.) Ditches have minimal slope and pond water in some areas; does not impede overall ability to drain the 24- hour, 25-year storm.
3. Are there indications of erosion on the landfill perimeter berm? ___ Yes X No
If 'Yes', describe what type and its condition (rill, gully, dimensions, etc.)
4. Is runoff from the landfill surface contained by the perimeter ditch or Ash Basin? X Yes ___ No
If 'No', describe where runoff flow is not contained.
5. Is runon prevented from entering the landfill area? X Yes ___ No
If 'No', describe where runoff flow is not contained.
6. Is the underdrain collection system draining? ___ Yes X No
Describe flow conditions. There is no water presently draining but it is expected that the underdrain layer does not have any water to drain.
7. Is there any unusual settlement causing "birdbaths"? ___ Yes X No
If 'Yes', describe.
8. Other observations around the landfill (changes since last inspection): ___ Yes X No
If 'Yes', describe. This is the first annual inspection.



**CCR Landfill
Weekly Inspection Report**

Name of Landfill: Monroe Vertical Extension Landfill **Qualified P.E.:** John Seymour
MDEQ Landfill ID: _____ **Date:** 12/18/2015 **Time:** 9- 11 AM

II. Repairs, Maintenance, Action Items

1. Has any routine maintenance been conducted since the last inspection? ___ Yes No
 If 'Yes', describe. _____
Note that Phase 1 is constructed and remaining phases are under construction.

2. Have any repairs been made since the last inspection? ___ Yes No
 If 'Yes', describe. _____
Note that Phase 1 is constructed and remaining phases are under construction.

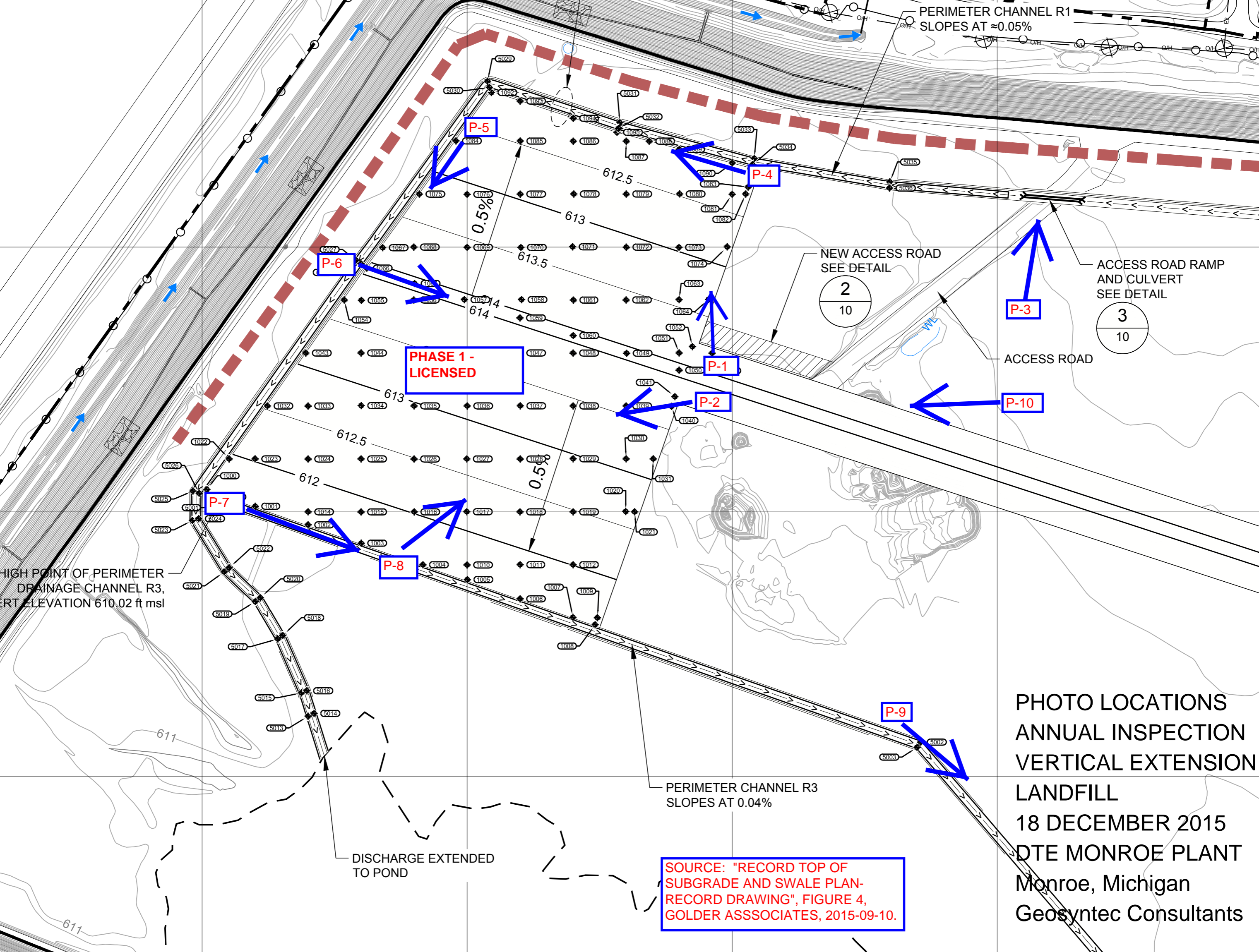
3. Has this inspection identified any need for repair or maintenance? ___ Yes No
 If 'Yes', describe and state the urgency of maintenance. "Urgent" for maintenance that should be conducted as soon as possible, "Moderate" for maintenance that should be conducted within three months, and "Not Urgent" for maintenance that can be conducted within a year.

4. Are the instrumentation intact and functioning? Yes ___ No
 If 'No', describe conditions of instrumentation. No visible damage observed; recent readings were received.

III. Photography

Photographs can be taken of notable features. List of photographs:

	<u>Location</u>	<u>Direction of Photo</u>	<u>Description</u>
i.	<u>See attached photo log</u>	_____	_____
ii.	_____	_____	_____
iii.	_____	_____	_____
iv.	_____	_____	_____
v.	_____	_____	_____
vi.	_____	_____	_____
vii.	_____	_____	_____
viii.	_____	_____	_____
ix.	_____	_____	_____
x.	_____	_____	_____



PERIMETER CHANNEL R1
SLOPES AT ≈0.05%

P-5

P-4

P-6

P-3

PHASE 1 -
LICENSED

P-1

P-10

P-2

P-7

P-8

P-9

HIGH POINT OF PERIMETER
DRAINAGE CHANNEL R3,
VERT ELEVATION 610.02 ft msl

NEW ACCESS ROAD
SEE DETAIL
2
10

ACCESS ROAD RAMP
AND CULVERT
SEE DETAIL
3
10

ACCESS ROAD

PERIMETER CHANNEL R3
SLOPES AT 0.04%

DISCHARGE EXTENDED
TO POND

SOURCE: "RECORD TOP OF
SUBGRADE AND SWALE PLAN-
RECORD DRAWING", FIGURE 4,
GOLDER ASSOCIATES, 2015-09-10.

PHOTO LOCATIONS
ANNUAL INSPECTION
VERTICAL EXTENSION
LANDFILL
18 DECEMBER 2015
DTE MONROE PLANT
Monroe, Michigan
Geosyntec Consultants

DTE MONROE ASH BASIN VERTICAL EXTENSION



Photo 1: CCRs previously placed in Phase 1. East edge of Phase 1 shown from center left to center right.



Photo 2: Trucks containing CCR placing in Phase 1 and smooth drum roller compaction equipment. Stored geotextiles under white plastic cover to the left.

DTE MONROE ASH BASIN VERTICAL EXTENSION



Photo 3: Surface water drainage pipes in the Perimeter Swale to convey runoff below the access road.



Photo 4: North Perimeter Berm near access road looking west. The perimeter swale is to the right and bottom ash is to the left in Phase 1.

DTE MONROE ASH BASIN VERTICAL EXTENSION



Photo 5: West Perimeter Berm looking south. The perimeter swale is to the right and limestone is to the left in Phase 1.



Photo 6: View of filling operations in the background with the buried instrumentation cabling for the inclinometer and piezometers in the foreground and center. Looking east.

DTE MONROE ASH BASIN VERTICAL EXTENSION



Photo 7: South Perimeter Berm looking east. Perimeter swale on the right and limestone base to the left.



Photo 8: View of filling operations from the south berm looking northeast.

DTE MONROE ASH BASIN VERTICAL EXTENSION



Photo 9: View of surface water drainage swale in southeast portion of the Landfill to the east of Phase 1. The Landfill construction will be to the left but has not yet reached this area.



Photo 10: View of fly ash surface to the east of Phase 1 looking at a temporary, 550-gallon, double lined fuel tank looking southwest.

APPENDIX D



DTE Monroe

Total Ash - Monthly/YTD - 2015

<i>Material</i>	<i>January Tons</i>	<i>February Tons</i>	<i>March Tons</i>	<i>April Tons</i>	<i>May Tons</i>	<i>June Tons</i>
FLY ASH						
BOTTOM ASH						
WWT SLUDGE						
HYDROCHEM						
TOTAL MONTHLY						

<i>Material</i>	<i>July Tons</i>	<i>August Tons</i>	<i>September Tons</i>	<i>October Tons</i>	<i>November Tons</i>	<i>December Tons</i>
FLY ASH				9.31	118.61	48.06
BOTTOM ASH				2,382.31	1,737.10	4,481.19
WWT SLUDGE				409.23	484.70	1,440.72
HYDROCHEM				0.00	0.00	26.87
TOTAL MONTHLY				2,800.85	2,340.41	5,996.84

Note: DTE reported on 1/8/2016 that an additional 100 tons of bottom ash placed in October.

	<i>Year to Date - Tons</i>
FLY ASH	175.98
BOTTOM ASH	8,600.60
WWT SLUDGE	2,334.65
HYDROCHEM	26.87
Total YTD - All Material	11,138.10

By J Seymour, Geosyntec
 90 lbs/cuft
 27 cuft/cuyd
 2000 lbs/ton
 9167 cuyd