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November 14, 2018

Mr. Robert J. Lee  
DTE Electric Company  
One Energy Plaza, 655 G.O.  
Detroit, Michigan

Subject: Notification of Appendix IV Constituents at Statistically Significant Levels Above the Groundwater Protection Standards  
River Rouge Power Plant Bottom Ash Basin Coal Combustion Residual Unit  
1 Belanger Park Drive, River Rouge, Michigan

Dear Mr. Lee:

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule<sup>1</sup>). The CCR Rule, which became effective on October 19, 2015, applies to the DTE Electric Company (DTE Electric) River Rouge Power Plant (RRPP) Bottom Ash Basin (BAB).

In response to the statistically significant increases (SSIs) above background for boron, fluoride and pH, DTE Electric established an Assessment Monitoring Program for the RRPP BAB CCR unit pursuant to §257.94(e) of the CCR Rule as presented in the April 13, 2018 Establishment of an Assessment Monitoring Program River Rouge Power Plant Bottom Ash Basin Coal Residual Unit letter. In accordance with §257.95, TRC conducted two assessment monitoring events, a preliminary and subsequent resample event, at the RRPP BAB CCR unit. The preliminary Appendix IV only assessment monitoring event (per §257.95(b)) was performed on April 6, 2018, and the subsequent first semiannual assessment monitoring event (per §257.95(d), Appendix III and IV parameters) was performed on May 30 and 31, 2018. The results from the initial assessment monitoring sampling event were used to establish groundwater protection standards (GWPSs) for the Appendix IV constituents in accordance with §257.95(h). The results from the assessment monitoring sampling events were subsequently used to perform the statistical comparison to the established GWPSs.

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<sup>1</sup> United States Environmental Protection Agency (USEPA) final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) published April 17, 2015, as amended per Phase One, Part One of the CCR Rule (83 FR 36435).

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On October 15, 2018, it was determined that pursuant to §257.93 (h) that arsenic and lithium are present at statistically significant levels above their respective GWPSs at one or more down gradient well locations at the RRPP BAB CCR unit. Therefore, DTE Electric, as required under §257.95(g), has requested TRC to prepare this notification identifying that arsenic and lithium have SSIs over their respective GWPSs. DTE Electric will place this notification in the RRPP CCR unit operating record as required by §257.105(h)(8). DTE Electric will also notify the State Director by no later than December 14, 2018 as required by §257.106(h)(6) and post this notification on a publicly accessible internet site by no later than December 14, 2018 as required by §257.107(h)(6). In addition, DTE Electric will proceed with additional characterization and notifications as required under §257.95(g).

Although DTE Electric will proceed with assessment of corrective measures per §257.95(g)(3), DTE Electric is currently operating a groundwater extraction system as a presumptive remedy to maintain hydraulic control around the RRPP BAB to address the uncertainty around the potential migration of CCR constituents from the RRPP BAB to groundwater. This system effectively captures groundwater in the vicinity of the RRPP BAB CCR unit, and eliminates the potential for Appendix III and Appendix IV parameters to migrate from the RRPP BAB CCR unit.

Please contact me at 734.585.7813 should you have any questions regarding this letter.

Sincerely,

TRC Engineers Michigan, Inc.



Graham Crockford, C.P.G.  
Senior Project Hydrogeologist