DTE Electric Company — River Rouge Power Plant
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 40 C.F.R. 257.80.

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

River Rouge Power Plant (RRPP) is located in the City of River Rouge, Michigan. The plant is located south of Zug Island, at the mouth of the Rouge River (Short Cut Canal) and on the Detroit River. RRPP ceased operation as a coal fired generating station in May of 2020. The former Bottom Ash Basin (BAB), located immediately north of the RRPP and south of the Rouge River Short Cut Canal, is a physical sedimentation basin that was utilized as an incised CCR surface impoundment that formerly received sluiced bottom ash and other process effluent from the RRPP throughout its operational life.

As documented in the November 2020 Bottom Ash Basin Closure Certification Report, CCR was removed from the former BAB in accordance with the requirements of 40 C.F.R. 257.102(c).

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 across the plant property. These include limiting speed, water sprays, dust suppressant application, conditioning 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 15 miles per hour (mph) or less, as posted. This speed limit applies to all traffic. Paved and unpaved surfaces are regularly water-flushed. Paved surfaces may also be vacuum-swept or wet broom swept. Water-flushing is done using wash down hoses 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 lots are also treated with dust suppressant several times per year.

As with all other areas of the facility, driving surfaces and other surfaces at the plant traveled while transporting bottom ash and other CCRs will be treated with water and/or dust suppressant as outlined above.

All vehicles transporting bulk loads off site shall comply with Section 324.5524(3)(d) of the Michigan Natural Resources & Environmental Protection Act which requires covers over solid loads that may generate dust and that leaks of liquid be prevented. This includes trucks hauling bottom ash and/or CCR off site.

Personnel responsible for the implementation of this fugitive dust plan are appropriately trained to proactively manage fugitive dust; and identify and correct any deficiencies in the dust control measures.

5.0 Effectiveness Assessment & Monitoring

The effectiveness of this plan will be assessed periodically by the DTE Environmental Management and Safety organization.

Plant personnel perform routine inspections throughout the facility once per shift (twice daily). Any instances of fugitive dust observed anywhere on the property are addressed in a timely manner.

Agency inspections are also done on a regular basis at the plant. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) periodically inspects all emissions and fugitive dust controls. Downriver Wastewater Treatment Plant also inspects the former BAB annually for compliance with the Sanitary Sewer permit used in emergency discharge situations. 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 bottom ash basin, 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 onsite or any other part of the facility are logged and tracked via procedures set forth by the plant's 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 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	Updated to reflect removal of CCR from the bottom ash basin, and 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: _____

Engineer: Nicholas Reidenbach

Registration No.: 6201060717 State: Michigan

Date: 11/8/2021

SEAL: