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April 13, 2018

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

Subject: Establishment of an Assessment Monitoring Program
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). 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).

Pursuant to §257.94 (e) of the CCR Rule, if the owner or operator of the CCR unit determines, pursuant to §257.93 (h) that there is a statistically significant increase (SSI) over background levels for one or more of the constituents listed in appendix III to this part at any monitoring well at the waste boundary specified under §257.91(a)(2), the owner operator must pursuant to §257.94 (e) (1) Except as provided in §257.94 (e) (2) within 90-days of detecting a SSI over background levels for any constituent, establish an assessment monitoring program meeting the requirements of §257.95. Therefore, based on the information presented in the January 2018 RRPP BAB CCR Unit Annual Groundwater Monitoring Report an assessment monitoring program is being established at the DTE Electric RRPP BAB CCR unit. Pursuant to §257.94 (e) (3) of the CCR Rule, DTE Electric needs to prepare a notification stating that an assessment monitoring program has been established for the RRPP BAB CCR unit. DTE Electric has completed the notification when the notification has been placed in the RRPP BAB CCR unit operating record as required by §257.105 (h) (5).

In addition, pursuant to §257.106 (h) (4) DTE Electric must notify the Michigan State Director when the notification that an assessment monitoring program has been established at the RRPP BAB CCR unit under §257.105 (h) (5) has been placed in the operating record and on the DTE Electric publically accessible internet site. Finally, per §257.107 (h) (4) DTE Electric must place the notification that an assessment monitoring program has been established as specified under §257.105 (h) (5) on the DTE

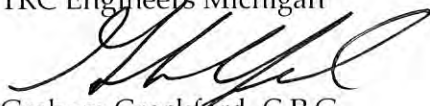
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Electric CCR Web site within 30-days of placing the notification in the RRPP BAB CCR unit operating record.

Given the uncertainty around the potential hydraulic connection between the RRPP BAB CCR unit and the uppermost aquifer, the detected arsenic concentrations above the generic Michigan Part 201 drinking water and groundwater surface water interface criteria within the uppermost aquifer around the RRPP BABs CCR unit during background sampling, and the proximity of the BAB to the Rouge River, DTE Electric is proactively managing this potential migration pathway. DTE Electric's selected management strategy is to operate a groundwater extraction system to control the uncertainty around the potential migration of CCR constituents from the BAB to groundwater. This system was constructed during January and February 2018 and is currently operational.

Please contact me at 313.235.7815 should you have any questions regarding this letter.

Sincerely,
TRC Engineers Michigan



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

