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February 13, 2019

Mr. Robert J. Lee
DTE Electric Company
One Energy Plaza, 410 G.O.
Detroit, Michigan

Subject: Notification of Initiation of Assessment of Corrective Measures
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 Rule¹). 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).

On October 15, 2018, it was determined that pursuant to §257.93 (h) that arsenic and lithium were present at statistically significant levels above their respective groundwater protection standards (GWPSs) at one or more down gradient well locations at the RRPP BAB CCR unit during the first assessment monitoring event performed on May 30, 2018. DTE Electric took preemptive measures to correct the impacts as highlighted below. DTE Electric, as required under §257.95(g), placed a Notification of Appendix IV Constituents at Statistically Significant Levels Above the Groundwater Protection Standards in the RRPP BAB CCR unit operating record on November 14, 2018. As assessment of corrective measures began on January 14, 2019, DTE Electric has requested TRC to prepare this notification that the RRPP BAB CCR unit has initiated assessment of corrective measures as required by §257.95(g)(3). DTE Electric will place this notification in the RRPP BAB CCR unit operating record as required by §257.105(h)(9).

Although DTE Electric will proceed with assessment of corrective measures per §257.96, on March 2, 2019 DTE Electric began operation of and is currently operating a groundwater extraction system as a presumptive remedy to maintain hydraulic control around the RRPP BAB to proactively manage the

¹ 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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potential migration pathway. 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