1540 Eisenhower Pl.
Ann Arbor, MI 48108

T 734.971.7080
TRCcompanies.com

December 16, 2019

Mr. Chris Scieszka
DTE Electric Company
One Energy Plaza, 410 G.O.
Detroit, Michigan 48226

Subject: Federal CCR Rule – Notice of Alternative Closure Per 40CFR 257.103(b)
River Rouge Power Plant Coal Combustion Residual (CCR) Bottom Ash Basin (BAB)

Dear Mr., Scieszka,

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), as amended July 30, 2018. The CCR Rule, which became effective on October 19, 2015 (amendment effective August 29, 2018), applies to the DTE Electric (DTE) River Rouge Power Plant (RRPP) Bottom Ash Basin (BAB).

On October 17, 2016, in accordance with the schedule defined in Section 257.102(b)(2) of the CCR Rule, DTE placed an Initial Written Closure Plan for the River Rouge BAB into the Operating Record. In this Closure Plan, DTE proposes to close the River Rouge BAB by CCR removal and offsite disposal, including decontamination of the unit and backfilling/surface grading to restore the former BAB area to pre-operation conditions. CCR removal and off-site disposal is considered a conservative and viable source material management option for the site, offering a high level of long-term performance and reliability.

In accordance with the schedule defined in 40 CFR 257.90(b)(1), a groundwater monitoring system was installed around the RRPP BAB as required by 40 CFR 257.91, and background groundwater monitoring well sampling was completed as required by 40 CFR 257.93. DTE noted that boron, fluoride, and pH were observed within groundwater at one or more downgradient monitoring wells with statistically significant increases (SSIs) above background limits. Therefore, DTE initiated assessment monitoring pursuant to §257.95 of the CCR Rule. It was determined that arsenic and lithium were present at statistically significant levels above their respective groundwater protection standards (GWPSs) at down gradient well locations at the RRPP BAB CCR unit. An Assessment of Corrective Measures (ACM) was initiated. DTE immediately initiated action to eliminate the groundwater impact for the interim prior to closure of the unit. That action has been successful. The preferred alternative in the ACM was to close the RRPP BAB by CCR removal and offsite disposal and address the CCR affected groundwater by operating an interim groundwater collection system. DTE took preemptive measures to correct the groundwater impacts by designing, installing, and operating an interim measure groundwater collection system to mitigate any potential risk of migration of

groundwater away from the BAB. The installed collection system maintains groundwater hydraulic control within the RRPP BAB CCR unit, and groundwater around the entire perimeter of the RRPP BAB is now captured by the extraction wells.

Concurrent with the above referenced activities, DTE evaluated alternative on-site and off-site CCR management options along with options for the continued operation of the coal-fired boilers. DTE has decided to cease the use of coal to fuel the boiler in May 2020. Consequently, use of the River Rouge BAB to manage sluiced ash will no longer be necessary. Given that currently there is no alternative on-site disposal capacity (no other CCR unit), and there is currently no on-site infrastructure to manage sluiced ash for off-site disposal, DTE is providing notice of its intent to continue to operate the BAB until July 2020 in accordance with 40 CFR 257.103(b). Given the short duration between now and the closure of the BAB in 2020, it is not feasible to construct infrastructure to manage the sluiced ash using alternative means (257.103(b)(1)(i)). DTE intends to permanently cease using coal to fuel the boiler at the RRPP by May 2020, at which time, CCR will no longer be routinely discharged into the BAB; however, residual clean-up of CCR-related processes with infrequent discharge into the BAB is anticipated to occur until July 2020. Closure of the CCR unit will be initiated by August 31, 2020 with CCR removal and associated construction activities anticipated to be completed within the timeframes specified in 257.103(b)(2).

Sincerely,
TRC

Graham Crockford, C.P.G.
CCR Program Manager

David B. McKenzie, P.E.
Senior Project Engineer
MI License No. 6201042332