DTE Electric Company — Sibley Quarry
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 40CFR257.80.

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

The Sibley Quarry Landfill is located at 801 Fort Street in Trenton, Michigan. The Sibley Quarry Landfill is license in accordance with Michigan's solid waste disposal licensing requirements (Operating License 9602, 2020), and consists of 207 acres. The landfill receives coal ash from the Trenton Channel Power Plant, and coal ash and waste gypsum from the Monroe Power Plant. The landfill is included in the Trenton Channel Power Plant ISO 14001 certification. The Trenton Channel Power Plant is located approximately 3 miles south of the Sibley Quarry Landfill.

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 the dust control measures were developed in accordance with good engineering practices. Many measures for dust control are used throughout the landfill. These include limiting speed, water sprays, the use of a sweeper at the landfill entrance, truck wheel wash building, 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 unpaved roads is 15 miles per hour (mph). This speed limit applies to all traffic.

Paved surfaces are wetted with a water truck or swept. Unpaved road surfaces are wetted during landfill operations, as necessary. High traffic unpaved haul roads are treated with a dust suppressant two times per year if deemed necessary. Unpaved roads are not required to be wetted if documented that recent precipitation is controlling fugitive dust. The use of the on-site conveyor system is restricted to manage only moist bottom ash.

5.0 Effectiveness Assessment & Monitoring

The effectiveness of this plan will be assessed through several avenues. Landfill personnel perform routine inspections of the facility each day of landfill operation. Instances of fugitive dust observed on the property are addressed in a timely manner. On-site conditions are logged according to the Sibley Quarry Fugitive Dust Control Program (SQ-1). The landfill is subject to periodic facility environmental audits coordinated by the corporate environmental organization. Additionally, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) performs a quarterly site inspection.

Any citizen complaints received regarding fugitive dust or other environmental issues at the landfill are logged and tracked via procedures set forth by the plant's IS014001 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. The first report will be completed by April 2016 and subsequent reports will be completed within one year of the previous report.

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).

4.0 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	Provided operating license information in section 3.0. Refined activities in sections 4.0 and 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: