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October 11, 2016

Mr. Joseph Garavaglia  
Environmental Management & Resources  
DTE Electric Company  
One Energy Plaza, 655 G.O.  
Detroit, MI 48226-1221

Subject: Saint Clair Power Plant Coal Combustion Residual (CCR) Surface Impoundment  
Liner Design Evaluation – Bottom Ash Basins

Dear Mr. Garavaglia:

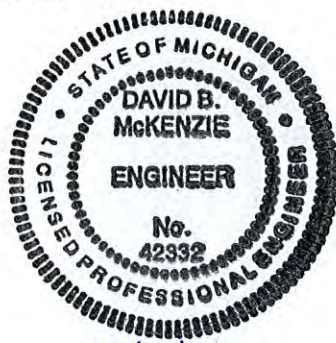
DTE Electric Company manages coal combustion residuals generated at the Saint Clair Power Plant (SCPP) in two bottom ash sedimentation basins [surface impoundments according to the Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (federal CCR rule)]. TRC has reviewed available information for the construction of the bottom ash basins to evaluate whether the existing surface impoundment liner systems meet the requirements for existing lined surface impoundments as required in Title 40 Code of Federal Regulations (CFR) 257.71.

The existing SCPP surface impoundment bottom ash basins were constructed by incising into native clay with sheet pile walls and a native clay bottom. Even though laboratory permeability tests performed on samples collected from this native clay indicate that the hydraulic conductivity of surrounding clay soils is less than  $10^{-7}$  cm/sec, these basins were not constructed in accordance with the requirements of 40 CFR 257.71. Therefore, these bottom ash basins are considered unlined existing surface impoundments and are subject to the requirements of 40 CFR 257.101(a).

Sincerely,

TRC Environmental Corporation

David B. McKenzie, P.E.  
Senior Engineer



10/11/16

Graham Crookford  
Senior Consultant