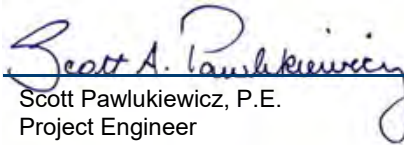




Final Selection of Remedy Report

**River Rouge Power Plant Bottom Ash
Basin
Coal Combustion Residual Unit
1 Belanger Park Drive
River Rouge, Michigan**

November 30, 2023


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Prepared For:

DTE Electric Company

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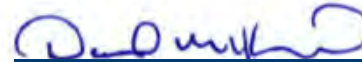

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APPENDICES

- Appendix A Public Meeting Notice and Affidavit of Publication

1.0 Introduction

1.1 Site Overview and Description of CCR Unit

The DTE Electric Company (DTE Electric) River Rouge Power Plant (RRPP) is located at 1 Belanger Park Drive, within the City of River Rouge in Wayne County, Michigan (Figure 1). The RRPP, including the Bottom Ash Basin (BAB) Coal Combustion Residual (CCR) unit, was originally constructed in the early 1950s on the southern shore of the Rouge River Short Cut Canal and along the west bank of the Detroit River in River Rouge, Michigan. The BAB, located immediately north of the RRPP and south of the Rouge River Short Cut Canal, formerly received sluiced bottom ash and other process effluent from the RRPP throughout its operational life through May 2020 when CCR generation at the RRPP ceased.

After CCR source removal was completed in September 2020 (in accordance with the BAB closure design plans and specifications), the BAB¹ was repurposed into a non-CCR process water pond. There is a sheet pile weir near the middle of the BAB that maintains the water elevation in the eastern portion to approximately 577.5 feet through gravity flow. The water in the western portion of the BAB is maintained at an elevation of no higher than 577 feet before being discharged by pumping into the Detroit River (via the overflow canal) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit.

DTE Electric proactively managed the potential groundwater migration pathway at the RRPP BAB using a groundwater extraction system consisting of 11 groundwater extraction wells installed around the RRPP BAB as an interim measure. The groundwater extraction system was constructed during January and February 2018, began operation in early March 2018, and was operated continuously until it was put into reserve on September 15, 2022 to implement an in-situ pilot test designed to confirm the findings of a preceding bench-scale study that was designed to assess the efficacy of in-situ groundwater geochemical sequestration options. The 6-month duration in-situ pilot test, completed in 2023, confirmed the findings from the bench-scale testing, namely the in-place immobilization of arsenic by injection of specific reagents, can be replicated in the field and subsequently scaled up for full implementation as a final groundwater remedy for the site as an alternative to continued operation of the interim groundwater extraction system.

1.2 Regulatory Background

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), referred to herein as the CCR Rule, as amended. The CCR Rule, which became effective on October 19, 2015 (with amendments in 2018 and 2020), applies to the DTE Electric Company (DTE Electric) River Rouge Power Plant (RRPP) Bottom Ash Basin (BAB). As presented herein, a written closure plan was developed, a groundwater monitoring system was installed, groundwater monitoring was performed, an

¹ For consistency throughout this document, the BAB is referred to as the “BAB” even though CCR removal and BAB closure activities were completed in September 2020 and it is now a process water pond.

interim groundwater measure was designed and installed (groundwater collection system), and an Assessment of Corrective Measures (ACM) was completed between October 2016 and April 2019². Removal of CCR in accordance with the written closure plan was completed between June 2020 and November 2020. Semi-Annual Progress Reports, prepared since October 2019 as a requirement of §257.97(a) of the CCR Rule, have described DTE Electric's progress toward selecting the final remedy for the RRPP BAB as discussed herein.

1.3 Remedy Selection Objectives

On behalf of DTE Electric, TRC has prepared this Final Selection of Remedy Report for the RRPP BAB as a requirement of §257.97(a) to formally select a remedial measure to address concentrations of Appendix IV constituents (specifically arsenic) in groundwater that are above relevant groundwater protection standards (GWPS). This Report describes the remedy selected along with how the remedy meets the following standards set forth in §257.97(b):

- *Be protective of human health and the environment;*
- *Attain the groundwater protection standard as specified pursuant to §257.95(h);*
- *Control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases of constituents in Appendix IV to this part into the environment;*
- *Remove from the environment as much of the contaminated material that was released from the CCR unit as is feasible, taking into account factors such as avoiding inappropriate disturbance of sensitive ecosystems; and,*
- *Comply with standards for management of wastes as specified in §257.98(d).*

The Final Selection of Remedy will be considered completed when it is placed in the facility's operating record as required by §257.105(h)(12).

² The April 2019 ACM was revised on October 3, 2022.

2.0 Closure by CCR Source Material Removal

On October 17, 2016, in accordance with the schedule defined in §257.102(b)(2) of the CCR Rule, DTE Electric placed an Initial Written Closure Plan for the BAB into the Operating Record; the Closure Plan was updated on July 15, 2020. This updated Closure Plan was implemented from June 2020 to November 2020 and included removal and off-site disposal of CCR source material from the RRPP BAB and decontamination of the unit as documented in the Bottom Ash Basin Closure Certification Report (TRC, November 2020, Revised February 2021).

3.0 Groundwater Remedy Selection Process

3.1 Groundwater Monitoring

In accordance with the schedule defined in 40 CFR §257.90(b)(1), a groundwater monitoring system was installed from June 2016 through June 2017 around the RRPP BAB as required by 40 CFR §257.91 (TRC, October 2017), and background groundwater monitoring well sampling was completed between August 2016 and September 2017 as required by 40 CFR §257.93. The monitoring well locations are shown on Figure 2. As documented in the January 31, 2018 Annual Groundwater Monitoring Report for the River Rouge Power Plant, covering calendar year 2017 activities, DTE Electric noted that boron, fluoride, and pH (Appendix III constituents) were observed within groundwater at one or more downgradient monitoring wells with statistically significant increases (SSIs) above background limits in the September 22, 2017 detection monitoring event.

In response, DTE Electric initiated an assessment monitoring program for the RRPP BAB pursuant to §257.95 of the CCR Rule. Groundwater within the groundwater monitoring system was sampled and analyzed for all constituents listed in Appendix IV on April 6, 2018 with the initial semiannual assessment monitoring event being completed on May 30, 2018. In accordance with §257.93 (h), on October 15, 2018, it was determined that arsenic and lithium (Appendix IV constituents) were present at SSIs above their respective GWPSs at one or more down gradient well locations at the RRPP BAB during the initial assessment monitoring event.

DTE Electric took proactive measures to address the affected groundwater by designing, installing, and operating (from March 2, 2018 to September 15, 2022) an interim measure groundwater collection system to mitigate any potential risk of migration of groundwater away from the BAB. The installed groundwater collection system extraction wells maintained groundwater hydraulic control around the entire perimeter of the RRPP BAB.

While operating the groundwater collection system, DTE Electric, as required under §257.95(g), placed a Notification of Appendix IV Constituents at Statistically Significant Levels Above the GWPSs in the RRPP BAB operating record on November 14, 2018.

3.2 Assessment of Corrective Measures

An Assessment of Corrective Measures (ACM) was initiated on January 14, 2019 and a notification was placed in RRPP's operating record, per §257.95(g)(3) and §257.105(h)(9), respectively. DTE Electric prepared and placed the initial ACM into the RRPP operating record on April 14, 2019 in accordance with the schedule and notification requirements of §257.96. The preferred alternative in the 2019 ACM was to close the RRPP BAB by CCR removal with offsite CCR disposal and to continue to operate the already in-place groundwater collection system. CCR removal and offsite disposal was completed from June 2020 to November 2020. Prior to CCR removal, concentrations of arsenic and/or lithium in groundwater above their respective GWPSs were observed in monitoring wells MW-16-01, MW-16-02, MW-17-14, and MW-17-15 (Figure 2). Groundwater data collected through 2022 shows overall improvement in the lithium groundwater quality with lower confidence limits decreasing below the GWPS at MW-

16-01. Since the removal of CCR through the first semiannual monitoring period of 2022, arsenic at MW-16-01 was the only ongoing exceedance of the GWPS within the downgradient monitoring wells within the monitoring well network. In October 2022, DTE Electric revised the 2019 ACM to include additional innovative technology that was not considered in the initial ACM to address the persistent concentrations of arsenic at MW-16-01. To remediate potential impacts of CCR source materials the following list of viable management strategies were assembled and assessed and compared to the No Action alternative:

- Monitoring and Institutional Site Controls (based on applicable regulatory framework) subsequent to Implemented CCR Source Control Measures;
- Groundwater Capture/Extraction;
- Impermeable Barrier (sheet pile or slurry wall) with Strategically-located Groundwater Capture/Extraction; and
- Geochemical Sequestration via Amendment Injection or Installation of a Permeable Reactive Barrier (PRB) Wall to retard contaminant movement.

The ACM indicated Geochemical Sequestration via Amendment Injection as the preferred alternative.

3.3 Semi-Annual Progress Reporting

DTE Electric completed the first Semi-Annual Progress Report on the remedy selection and design on October 15, 2019 with subsequent Semi-Annual Progress Reports completed in accordance with §257.97(a) through October 13, 2023.

3.4 Groundwater Geochemical Sequestration Bench/Pilot-Scale Test

In early 2022, DTE Electric conducted a bench-scale treatability study using site groundwater and soil to evaluate two in-situ treatment options for removing arsenic from groundwater at the former RRPP BAB and to potentially provide a final groundwater remedy for this site. These in-situ treatment options included: (1) zero-valent iron (ZVI), and (2) a solution of guar gum and ferrous sulfate. Results from this study indicated that ZVI was effective at removing both arsenate and arsenite from site groundwater. In addition, application of ferrous sulfate and guar gum was successful at stimulating anaerobic bacteria and enhanced the reduction of arsenic from groundwater through biological processes.

Beginning in late September 2022, DTE Electric commenced an in-situ pilot scale test to confirm that the findings from the bench scale testing, namely the in-place immobilization of arsenic by injection of specific reagents, can be replicated in the field and subsequently scaled up for full implementation as an alternative to continued operation of the groundwater extraction system. In preparation for the injection work, the groundwater extraction system was shut down to allow the groundwater hydraulic and geochemical conditions to stabilize prior to implementing the pilot test. The in-situ pilot study was completed in the second quarter of 2023. The pilot test results substantiated the bench study conclusions while also demonstrating that geochemical sequestration can be effectively applied via amendment injection to remove arsenic from groundwater in the affected/treated areas.

3.5 Public Meeting

On October 12, 2023, DTE Electric discussed the results of the corrective measures assessment with interested and affected parties in a public meeting, providing at least 30 days for comments to be received prior to the formulation of this Selection of Final Remedy required under §257.96(e). Appendix A includes the public notice that was published in the Detroit News and Detroit Free Press publicizing the public meeting for interested and affected parties and an affidavit from the publisher authenticating its publication. Additionally, notice was provided on the City of River Rouge website and social media accounts.

In accordance with §257.97(c)(4), DTE Electric must consider the degree to which community concerns will be addressed by the potential remedy(s). There were no community concerns raised during the public meeting about this preferred remedy, nor were any comments made by the community prior to formulation of this Final Remedy Selection Report.

4.0 Final Groundwater Remedy Selection

Based on the conclusions of the ACM and conclusions from the in-situ pilot test completed since the ACM was completed, DTE Electric has selected “*Geochemical Sequestration via Amendment Injection*” as the final remedy.

As noted in Section 3.4, the pilot test results demonstrated that geochemical sequestration via amendment injection is effective in removing arsenic from groundwater in the affected area. Conceptually, full-scale implementation will consist of injections utilizing a consistent delivery method and mixture developed during the pilot scale testing. The ZVI and ferrous sulfate will be mixed with potable water and guar to form a slurry. Injections of the slurry will cover the approximate area(s) depicted on Figure 3 targeting the groundwater zone between 15 and 25 ft below ground surface (bgs) which reflects where groundwater in the vicinity of the former BAB has historically and/or currently contained arsenic at concentrations above the GWPS.

DTE Electric will continue semiannual assessment monitoring as specified in §257.95, as well as annual nature and extent monitoring for the RRPP BAB CCR unit per §257.95(g)(1) to evaluate the effectiveness of the selected remedy. Groundwater monitoring will be performed in accordance with the existing Quality Assurance Project Plan – DTE Electric Company River Rouge Power Plant Bottom Ash Basin (the QAPP) (TRC, July 2016; revised August 2017) and statistically evaluated per the Groundwater Statistical Evaluation Plan – DTE Electric Company River Rouge Power Plant Coal Combustion Residual Bottom Ash Basin (Stats Plan) (TRC, October 2017).

4.1 Evaluation of Selected Remedy

The selected remedy is demonstrated to meet the standards of §257.97(b) as follows:

1. ***Be protective of human health and the environment:*** DTE Electric took proactive measures to address the affected groundwater 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 groundwater collection system extraction wells maintained groundwater hydraulic control around the entire perimeter of the RRPP BAB. Groundwater data collected through 2022 shows overall improvement in the lithium groundwater quality with lower confidence limits decreasing below the GWPS at MW-16-01. Since the removal of CCR through the first semiannual monitoring period of 2022, arsenic at MW-16-01 was the only ongoing exceedance of the GWPS within the downgradient monitoring wells within the monitoring well network. The in-situ pilot test completed in 2023 confirmed the findings from the bench scale testing, namely the in-place immobilization of arsenic by injection of specific reagents, can be replicated in the field and subsequently scaled up for full implementation as a final groundwater remedy for the site to achieve concentrations of arsenic below the GWPS. Groundwater monitoring and corrective action will continue until the data demonstrates that groundwater concentrations of Appendix IV constituents are below relevant GWPSs for three consecutive years of semiannual groundwater monitoring in accordance with §257.98(c).

2. Attain the groundwater protection standard as specified pursuant to §257.95(h): Groundwater data collected through 2022 shows overall improvement in the lithium groundwater quality with lower confidence limits decreasing below the GWPS at MW-16-01. Since the removal of CCR through the first semiannual monitoring period of 2022, arsenic at MW-16-01 was the only ongoing exceedance of the GWPS within the downgradient monitoring wells within the monitoring well network. The in-situ pilot test completed in 2023 confirmed the findings from the bench scale testing, namely the in-place immobilization of arsenic by injection of specific reagents, can be replicated in the field and subsequently scaled up for full implementation as a final groundwater remedy for the site to achieve concentrations of arsenic below the GWPS.
3. Control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases of constituents in Appendix IV to this part into the environment: DTE Electric closed the RRPP BAB by CCR removal and offsite disposal including decontamination of the unit and restoring the basin for stormwater/non-CCR wastewater management. The CCR removal and disposal activities conducted in 2020 were documented in the *Bottom Ash Basin Closure Certification Report, DTE Electric Company, River Rouge Power Plant Bottom Ash Basin Coal Combustion Residual Unit, 1 Belanger Park Drive, River Rouge, Michigan* (TRC, November 2020, Revised February 2021).
4. Remove from the environment as much of the contaminated material that was released from the CCR unit as is feasible, taking into account factors such as avoiding inappropriate disturbance of sensitive ecosystems: A total of 20,176 tons of excavated CCR and CCR-containing materials were transported and disposed at Sibley Quarry Landfill in Trenton, Michigan. Design grades were achieved and confirmatory sampling of the sediment bottom within the basin (as secondary documentation) confirmed that removal of the CCR material from the RRPP BAB was successfully completed.
5. Comply with standards for management of wastes as specified in §257.98(d): CCR removal activities were completed to close the RRPP BAB by CCR removal and offsite disposal in accordance with the requirements within §257.102(c) and Michigan's Natural Resources and Environmental Protection Act (NREPA) Part 115 Solid Waste Management Statute (Part 115) 324.11519b(9), the Michigan Department of Environment, Great Lakes, and Energy (EGLE) approved Bottom Ash Basin Closure Work Plan (TRC, May 2020), and within the closure timeframe, with certification of closure prior to December 28, 2020 in accordance with NREPA Part 115 (324.11519b(6) and 324.11519b(8)). On February 1, 2021, EGLE acknowledged that DTE Electric has effectively documented the removal of CCR from the RRPP BAB and accepted that CCR removal efforts have been satisfactorily completed.

As documented in Section 4.2.1 and 4.2.5 of the ACM, DTE considered the evaluation factors set forth in §257.97(c), and based on the assessment of those factors, is selecting “Geochemical Sequestration via Amendment Injection” as the final groundwater remedy in conjunction with the previously completed CCR removal and offsite disposal.

5.0 Implementation Schedule

The anticipated schedule for implementing and completing the remedy required by §257.97(d) can be summarized as follows:

- September 2020: CCR removal complete and repurposed into a non-CCR process water pond.
- October 2021: Assessment monitoring event showed continued elevated concentrations of arsenic at MW-16-01 above the GWPS.
- Early 2022 - Bench-scale treatability study to assess potential final groundwater remedy.
- November 2022 to May 2023: In-situ pilot study.
- ~Winter 2023 to Spring 2024: Final Remedy Implementation; injection fieldwork to take approximately one month to complete.
- ~Spring 2024 to Summer 2027: Performance Monitoring for three years (minimum); groundwater quality monitoring of the RRPP BAB CCR unit semiannually to demonstrate compliance with the GWPS.
- ~Summer 2027: RRPP BAB CCR Unit Closure (demonstrated by three years of performance monitoring); a Notification of Remedy Completion (Federal CCR Rule) will be prepared.

The schedule of remedial activities considered the factors set forth in paragraphs (1) through (6) of §257.97(d) as follows:

1. DTE Electric placed a notification of the statistical exceedances into the operating record on November 14, 2018, as required in §257.95(g) and within the timeframe required by §257.105(h)(8). In addition, as required in §257.95(g)(1), nature and extent groundwater sampling was conducted as detailed in the 2018 and 2019 Annual Groundwater Monitoring Reports (TRC, January 2019 and January 2020) and the 2020 through 2022 Annual Groundwater Monitoring and Corrective Action Reports (January 2021, January 2022, and January 2023).
2. As documented in the ACM, the in-place immobilization of arsenic by injection of specific reagents, can be replicated in the field and subsequently scaled up for full implementation as the final groundwater remedy for the site, with an expected high probability of achieving concentrations of arsenic below the GWPS established under § 257.95(h).
3. The Sibley Quarry Landfill in Trenton, Michigan contained the necessary disposal capacity for CCR managed during implementation of the closure by CCR removal completed in 2020.
4. As documented in the ACM, the potential risks to human health and the environment from exposure to contamination prior to completion of the remedy was managed via operation of an interim measure groundwater extraction system to mitigate any potential risk of migration of groundwater away from the BAB. In addition, all the land that overlies the potentially affected groundwater is owned by DTE Electric and there are no water supply wells located at the RRPP property.

-
5. Considerations of the resource value of the aquifer concluded that all the land that overlies the potentially affected groundwater is owned by DTE Electric. Because of the availability of a municipality-provided potable water supply within the City of River Rouge, the groundwater in the vicinity of the BAB and at the RRPP property is not used for drinking water purposes at the site and is not expected to be a source of drinking water for the greater community in the future. There are no drinking water wells installed at the property or surrounding properties.
 6. Two other relevant factors were identified that may have a minor impact on the implementation schedule of proposed remedial activities:
 - Extreme cold ambient temperatures— injection of water-based sequestering reagents may be hindered, and therefore the injection events may be targeted to when daytime temperatures are typically above freezing.
 - Availability of necessary equipment and specialists to complete the injection activities—specialty injection equipment and work crews, and sequestration chemicals are expected to be available within 60 days of notice to proceed.

6.0 Summary


The final groundwater remedy, “*Geochemical Sequestration via Amendment Injection*”, has been formally selected for the RRPP BAB CCR unit per §257.97 to meet the performance standards set forth in §257.97(b) as described herein and with consideration for the evaluation factors set forth in §257.97(c). The implementation schedule, as defined in Section 5.0 of this Report, and as required by §257.97(d), is expected to be complete within approximately one month of the start of the injection activities, and compliance with the GWPS should be achieved soon thereafter. In accordance with Michigan Law, any current or future use of this groundwater will be prohibited.

DTE Electric will continue semiannual assessment monitoring as specified in §257.95, as well as annual nature and extent monitoring for the RRPP BAB CCR unit per §257.95(g)(1) to evaluate the effectiveness of the selected remedy. Groundwater monitoring will be performed in accordance with the existing Quality Assurance Project Plan – DTE Electric Company River Rouge Power Plant Bottom Ash Basin (the QAPP) (TRC, July 2016; revised August 2017) and statistically evaluated per the Groundwater Statistical Evaluation Plan – DTE Electric Company River Rouge Power Plant Coal Combustion Residual Bottom Ash Basin (Stats Plan) (TRC, October 2017).

7.0 Report Certification

I, the undersigned Michigan Professional Engineer, hereby certify that I am familiar with the technical requirements of Title 40 Code of Federal Regulations Part 257 Subpart D (§257). I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the information in this demonstration is in accordance with current good and accepted engineering practice(s) and standard(s) and meets the requirements of §257.97.

For the purpose of this document, “certify” and “certification” shall be interpreted and construed to be a “statement of professional opinion.” The certification is understood and intended to be an expression of my professional opinion as a Michigan Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the analysis herein.

<p style="text-align: center;"><u>Name</u></p> <p style="text-align: center;">David B. McKenzie, P.E.</p>	<p style="text-align: center;"><u>License Expiration Date</u></p> <p style="text-align: center;">December 17, 2023</p>	 <p style="text-align: center;">Stamp</p>
<p style="text-align: center;"><u>Company</u></p> <p style="text-align: center;">TRC Engineers Michigan, Inc.</p>	<p style="text-align: center;"><u>Date</u></p> <p style="text-align: center;"><i>November 30, 2023</i></p>	

8.0 References

DTE Electric Company website: [DTE CCR Compliance Data and Information](#)

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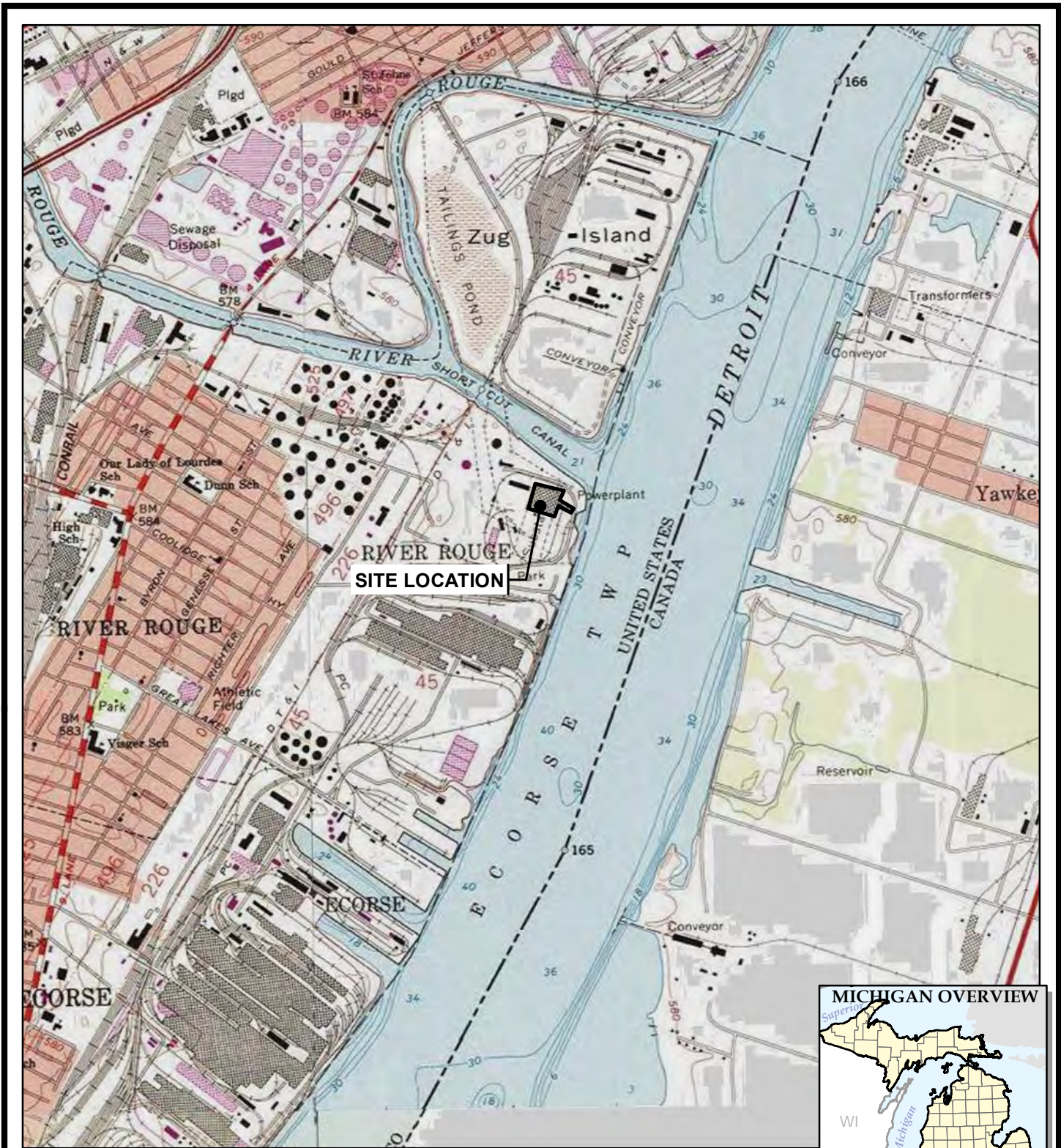
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Figures



BASE MAP FROM USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE SERIES.



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TRC - GIS

PROJECT:	DTE ELECTRIC COMPANY RIVER ROUGE POWER PLANT 1 BELANGER PARK DRIVE RIVER ROUGE, MICHIGAN
TITLE:	SITE LOCATION MAP

DRAWN BY:	M. VAPHIADIS
CHECKED BY:	B. YELEN
APPROVED BY:	V. BUENING
DATE:	JANUARY 2020
PROJ. NO.:	320511.0005
FILE:	320511-0005-0001SLMMB-RRPP-Fig01.mxd

FIGURE 1

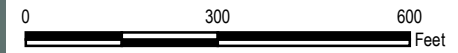


LEGEND

- COMPLIANCE WELLS
- MONITORING POINT
- NATURE AND EXTENT WELLS
- EXTRACTION WELL

NOTES

1. BASE MAP IMAGERY FROM GOOGLE, MAY 2022.
2. WELL LOCATIONS SURVEYED BY BMJ ENGINEERS AND SURVEYORS INC. IN JUNE 2016 & JUNE 2017.



1" = 300'
1:3,600

PROJECT:		DTE ELECTRIC COMPANY RIVER ROUGE POWER PLANT BOTTOM ASH BASIN 1 BELANGER PARK DRIVE RIVER ROUGE, MICHIGAN	
TITLE:		MONITORING NETWORK AND SITE PLAN	
DRAWN BY:	A. FOJTIK	PROJ NO.:	461816.0005
CHECKED BY:	B. YELEN	FIGURE 2	
APPROVED BY:	V. BUENING		
DATE:	JANUARY 2023		



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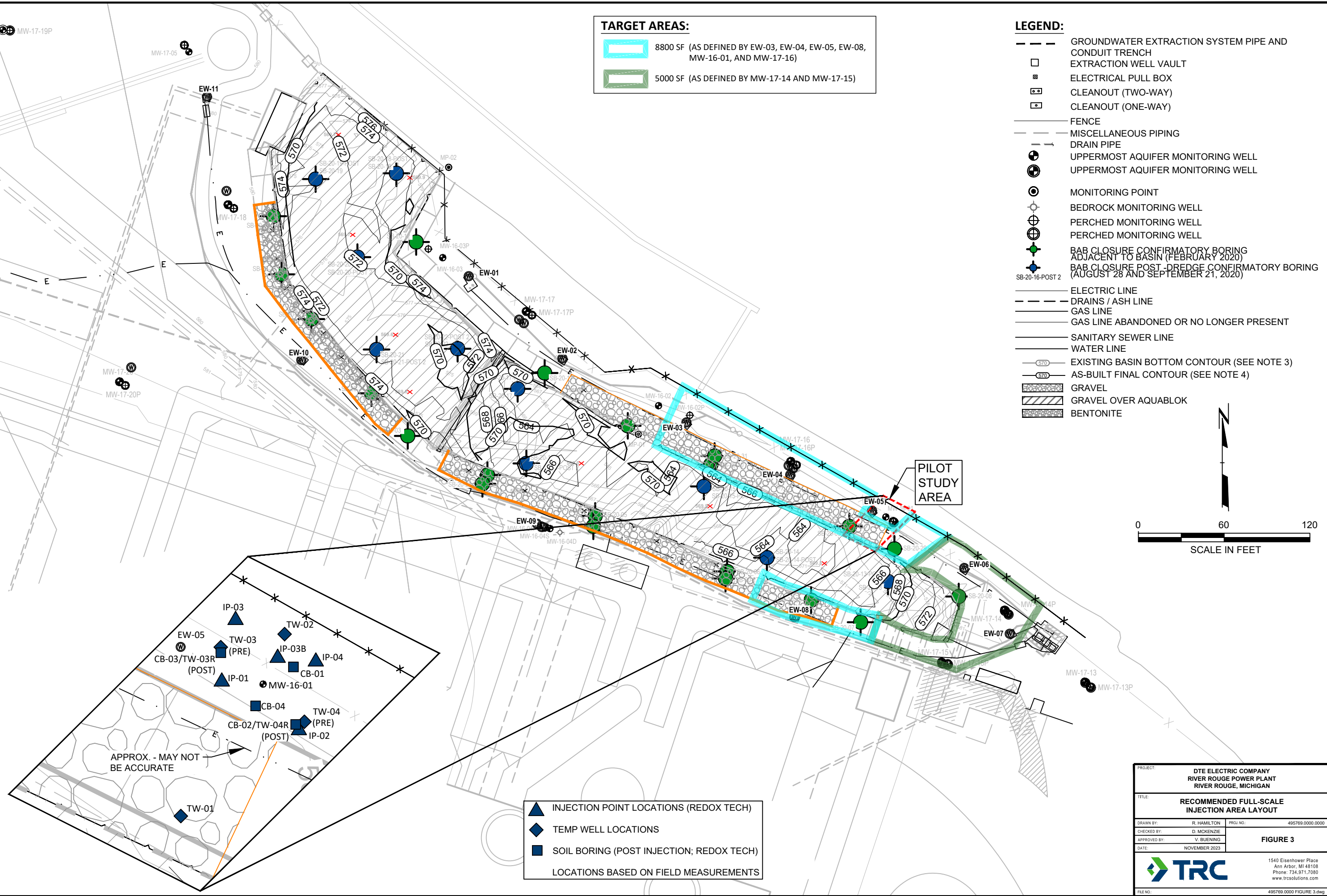
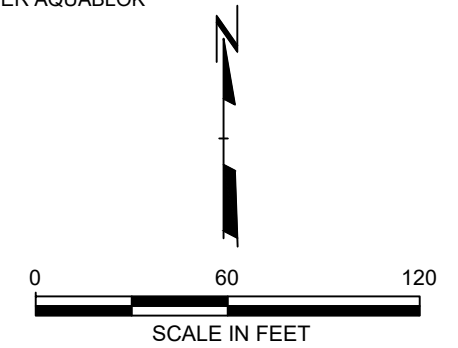
1741 - ATTACHED REFS: - ATTACHED IMAGES:
 DRAWING NAME: \\Madison\ip\CADD\IP\000DTERiver-Rouge\495769.0000 FIGURE 3.dwg - PLOT DATE: November 30, 2023 - 9:39AM - LAYOUT: Recommended Full-Scale Injection Area Layout

TARGET AREAS:

- 8800 SF (AS DEFINED BY EW-03, EW-04, EW-05, EW-08, MW-16-01, AND MW-17-16)
- 5000 SF (AS DEFINED BY MW-17-14 AND MW-17-15)

LEGEND:

- GROUNDWATER EXTRACTION SYSTEM PIPE AND CONDUIT TRENCH
- EXTRACTION WELL VAULT
- ELECTRICAL PULL BOX
- CLEANOUT (TWO-WAY)
- CLEANOUT (ONE-WAY)
- FENCE
- MISCELLANEOUS PIPING
- DRAIN PIPE
- UPPERMOST AQUIFER MONITORING WELL
- UPPERMOST AQUIFER MONITORING WELL
- MONITORING POINT
- BEDROCK MONITORING WELL
- PERCHED MONITORING WELL
- PERCHED MONITORING WELL
- BAB CLOSURE CONFIRMATORY BORING ADJACENT TO BASIN (FEBRUARY 2020)
- BAB CLOSURE POST - DREDGE CONFIRMATORY BORING (AUGUST 28 AND SEPTEMBER 21, 2020)
- SB-20-16-POST 2
- ELECTRIC LINE
- DRAINS / ASH LINE
- GAS LINE
- GAS LINE ABANDONED OR NO LONGER PRESENT
- SANITARY SEWER LINE
- WATER LINE
- EXISTING BASIN BOTTOM CONTOUR (SEE NOTE 3)
- AS-BUILT FINAL CONTOUR (SEE NOTE 4)
- GRAVEL
- GRAVEL OVER AQUABLOK
- BENTONITE



APPROX. - MAY NOT BE ACCURATE

- ▲ IP-03
- ▲ TW-03 (PRE)
- ▲ IP-03B
- ▲ IP-04
- ▲ IP-01
- ▲ CB-01
- ▲ MW-16-01
- ▲ CB-04
- ▲ TW-04 (PRE)
- ▲ IP-02
- ▲ CB-02/TW-04R (POST)
- ▲ CB-03/TW-03R (POST)
- ▲ TW-02
- ▲ TW-01

- ▲ INJECTION POINT LOCATIONS (REDOX TECH)
- ◆ TEMP WELL LOCATIONS
- SOIL BORING (POST INJECTION; REDOX TECH)

LOCATIONS BASED ON FIELD MEASUREMENTS

PROJECT: DTE ELECTRIC COMPANY RIVER ROUGE POWER PLANT RIVER ROUGE, MICHIGAN	
TITLE: RECOMMENDED FULL-SCALE INJECTION AREA LAYOUT	
DRAWN BY: R. HAMILTON	PROJ. NO.: 495769.0000.0000
CHECKED BY: D. MCKENZIE	
APPROVED BY: V. BUENING	FIGURE 3
DATE: NOVEMBER 2023	

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FILE NO.: 495769.0000 FIGURE 3.dwg

Appendix A

Public Meeting Notice and Affidavit of Publication

AFFIDAVIT OF DISTRIBUTION

STATE OF Michigan

COUNTY OF Wayne

I, Alysia Roe, being duly sworn on oath say he/she is and during all times herein stated has been the publisher of the publisher's designated agent in charge of the publication known as:

The Detroit News & Free Press ("Publisher")

And has full knowledge of the facts herein stated as follows:

The insert for DTE Electric Company ("Advertiser") was distributed to Publisher's full circulation on the 12th day of October 2023. DTE Public Notice Meeting.

By: Alysia Roe

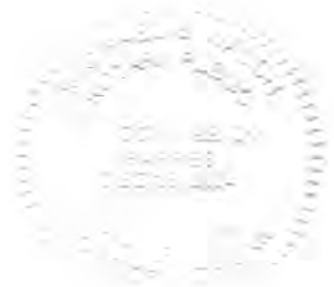
Subscribed and sworn to before me

this 17th day of October 2023.

Notary Seal:

Michael S. Walsh
Notary Public

MICHAEL S WALSH
Notary Public - State of Michigan
County of Wayne
My Commission Expires Dec. 16, 2024
Acting in the County of *Wayne*



Republicans nominate Scalise for speaker

BY LISA MASCARO, KEVIN FREKING AND FARNOUSH AMIRI
Associated Press

Washington — Deeply divided Republicans nominated Rep. Steve Scalise on Wednesday to be the next House speaker but struggled to quickly unify and elect the conservative in a public floor vote after the historic ousting of Rep. Kevin McCarthy from the job.

In private balloting at the Capitol, House Republicans narrowly pushed aside Ohio Rep. Jim Jordan, the firebrand Judiciary Committee chairman, in favor of Scalise, the current majority leader. The Louisiana congressman, who is battling blood cancer, is seen as a hero to some after surviving a shooting on lawmakers at a congressional baseball game practice in 2017.

“We have a lot of work to do,” Scalise said afterward.

A floor vote of the whole House was expected but then abandoned by nightfall. Tensions are still running high among Republicans and the House is at a standstill amid bitter infighting after McCarthy’s stunning removal last week. The House was gavelled into a brief session, then closed, with next steps uncertain.

It’s an extraordinary moment of political chaos at a time of uncertainty at home and crisis abroad, moving into a second week without a House speaker. Just 10 months after Republicans swept to power aspiring to operate as a team and run government more like a business, the GOP major-

ity has drifted far from that goal. “We need to make sure we’re sending a message to people all throughout the world, that the House is open to doing the people’s business,” Scalise said.

What’s uncertain is whether lawmakers who supported Jordan, the hard-liner backed by Donald Trump, will throw their support to Scalise in what is sure to be a close vote of the full House. Democrats are set to oppose the Republican nominee, easily nominating their leader, New York Rep. Hakeem Jeffries.

Jordan said little after the vote, only that the GOP majority “is divided.”

But Jordan did offer to give Scalise a nominating speech on the floor, in what would be a show of support during a vote. And Jordan himself plans to vote for Scalise, and is encouraging his colleagues to do the same, said a person familiar with the private talks and granted anonymity to discuss them.

A centrist leader, Rep. Don Bacon, R-Neb., said, “We do need to get a speaker in place so we can govern.”

“What we should have heard today after the vote count was: ‘I will heartily support Steve. Let’s get behind him,’” Bacon said. “We did not hear that.”

Americans are watching. One-quarter of Republicans say they approve of the decision by a small group of Republicans to remove McCarthy as speaker. Three in 10 Republicans believe it was a mistake, according to a



Mark Schiefelbein / AP

In a floor vote, Steve Scalise would need to amass votes from almost all Republicans to overcome the Democratic opposition.

poll from The Associated Press-NORC Center for Public Affairs Research.

At the White House, presidential press secretary Karine Jean-Pierre said, “We want to see the chaos be done with so that we can deliver for the American people.”

The hard-right coalition of lawmakers that ousted McCarthy, R-Calif., has shown what an oversized role a few lawmakers can have in choosing his successor.

In a floor vote, Scalise would need to amass votes from almost all Republicans to overcome the Democratic opposition. Usually, the majority needed would be 218 votes, but there are currently two vacant seats, dropping the threshold to 217.

Many Republicans want to prevent

the spectacle of a messy House floor fight like the grueling January brawl when McCarthy became speaker.

Behind closed doors, the Republicans voted to set aside a proposed rules change that would have tried to ensure a majority vote before the nominee was presented for a full floor vote.

Without the rules change, the Republican lawmakers would be expected to agree to a majority-wins process. But several lawmakers announced they were not supporting Scalise.

Rep. Marjorie Taylor Greene, R-Ga., said she backed Jordan in the private ballot and would do so in the floor vote. Rep. Thomas Massie, R-Ky., said he let Scalise know “he doesn’t have my vote on the floor.”

Scalise worked from the speaker’s office at the Capitol, trying to shore up the vote.

“Steve’s going to have to talk to them all and see what their concerns are,” said McCarthy, who said he would be voting for Scalise.

Neither Scalise nor Jordan was seen as the heir apparent to McCarthy, who was removed in a push by the far-right flank after the speaker led Congress to approve legislation that averted a government shutdown.

Several lawmakers, including Rep. Matt Gaetz, R-Fla., who engineered McCarthy’s ouster, said they would be willing to support either Scalise or Jordan.

“Long live Speaker Scalise,” Gaetz said after the vote.

NATION

Some Republicans push to expel Santos

Washington — A group of first-term New York Republicans said Wednesday they will push to expel fellow New York Rep. George Santos from Congress, adding a new wrinkle to the ongoing chaos surrounding the chamber’s leadership. Rep. Anthony D’Esposito, R-N.Y., told reporters that the group plans to introduce a privileged resolution to oust Santos from the House, a measure that would require a two-thirds majority. A superseding indictment unveiled Tuesday charged Santos with filing fraudulent fundraising reports and repeatedly charged donor credit cards without permission.

WORLD

Zelensky seeks more NATO support

Brussels — For the first time, Ukraine President Volodymyr Zelensky joined a meeting of more than 50 defense leaders from around the world Wednesday to make a personal pitch for military aid, in the face of lagging political support in the U.S. and new pressure on allies to send weapons to bolster Israel’s war with Hamas.

Asked about concerns that Ukraine could get less military support because of the war in Israel, Zelensky said there is a “very understandable volume” that the U.S. and Europe can provide. Zelensky said he is still assuming U.S. and European support. U.S. Defense Secretary Lloyd Austin said both allies will be supported.

Lidia dissipates after Mexico landfall

Mexico City — Lidia dissipated Wednesday after hitting land as a Category 4 hurricane near the resort of Puerto Vallarta, where one person was killed by a falling tree and two others injured. The hurricane blew roofs off houses with winds as high as 140 mph before moving inland.

Detained journalist back in Australia

Canberra, Australia — A Chinese Australian journalist who was convicted on murky espionage charges and detained in China for three years has returned to Australia, Prime Minister Anthony Albanese said Wednesday. Cheng Lei, 48, worked for the international department of China’s state broadcaster CCTV. She has reunited with her two children in Melbourne, Albanese said.

From Detroit News wire services

DTE PUBLIC MEETING RIVER ROUGE CITY HALL OCTOBER 12, 2023; 5-7 P.M.

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ACT test scores drop to 30-year low

BY CHEYANNE MUMPHREY
Associated Press

High school students’ scores on the ACT college admissions test have dropped to their lowest in more than three decades, showing a lack of student preparedness for college-level coursework, according to the nonprofit organization that administers the test.

The average ACT composite score for U.S. students was 19.5 out of 36. Last year,

the average score was 19.8.

Michigan seniors scored higher than the national average on the ACT in 2023, with an average composite score of 24.4. But scores in Michigan have declined 2.7% since 2021, when the average composite score was 25.1.

A small percentage of Michigan students, however, take the ACT. In 2023, 7% of Michigan graduating seniors took the ACT, down from 9% of in 2021.

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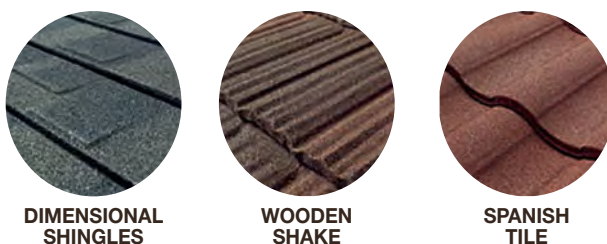
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COVER STORY

Autistic kids on buses

Continued from Page 1A

younger daughter, who witnessed the fatal accident.

"It was awful, terrible," Jones said. "I was losing it."

The grief, a year and a half later, doesn't go away.

Across southeastern Michigan, children with autism have been assaulted on the bus. Bullied. Left with marks on their body. Even lost, only to be found in an empty bus more than an hour later, parents told the Detroit Free Press. They said that, despite state-mandated training, drivers and aides don't always understand how to react when a child's behavior spins out of their control, a circumstance that can become fraught fast in a moving vehicle.

Ann Arbor's school district was thrown into turmoil over the summer — with the superintendent ousted — after a video showed a bus aide smacking and restraining a 7-year-old boy screaming in terror. A lawsuit claims his mother was kept in the dark about the incident for five weeks. The district has defended its handling of the case, and a spokesman said the aide involved was removed from service when the incident was observed on video.

The Free Press identified a string of incidents on Michigan school buses involving autistic children reported by media outlets over the past five years, several leading to lawsuits against school districts and the third-party companies often tasked with transporting students. Advocates and experts say these incidents, while likely not widespread, are a problem that needs addressing through better training and hiring, particularly when the job of a bus driver or aide can be extraordinarily demanding and involve children who require specialized support.

Some children with autism struggle with transitions, and "the biggest transition to a student with autism we're going to make our entire school day is on a school bus," said Patrick Mulick, a behavior analyst and school administrator in Washington state who advocates for better training for school bus staff.

University of Southern California researchers noted in a 2017 report there were increasing media reports on incidents in which autistic children were lost, injured or even died. The researchers wrote that there is a "critical need" to address shortfalls in transportation that put vulnerable children at risk.

"That transition is from leaving the comforts of their own home and getting on these commercial vehicles that are driving around town and taking them to a place where there's high demand," Mulick said. "There's a lot of people, there's a lot of stimulation, and there's high expectations."

'She would point at buses and just cry'

Five-year-old Charlie Fox was missing for more than an hour before officials found her in an empty Lapeer Community Schools bus in a district lot in 2019. At the time, Charlie was nonverbal.

"For the longest time, she would point at buses and just cry when we would drive by them and then I would cry too, because I know how she felt," said Sarah Fox, Charlie's mother.

Now, Fox drives her daughter to school as well as to therapy appointments. She can still recall the terror she felt calling the district and its transportation division when Charlie didn't show up to a therapy appointment to which the bus was supposed to take her. Fox went door-to-door looking for her daughter because officials told her they'd dropped Charlie off with an adult. Finally, Fox received an update: Charlie was found still strapped to her seat on the bus.

Jared Field, a spokesman for Lapeer Community Schools, wrote in an emailed response to questions that "our drivers and bus aides are required to clear the bus when the bus returns to the garage. There's also a sign that has to be posted in the back of the bus once it has been checked and cleared."

Across metro Detroit, parents of children with autism have raised alarms about bus safety. Among them:

- A mother in Dearborn told the district's school board in a May 2022 meeting that her 13-year-old son, who is nonverbal, was choked by his harness on the way to school. "By the time they got to school, his lips were blue, his eyes were red and he had red spots on his face that were a result of lack of oxygen," she said. The mother said two weeks passed and she still hadn't received answers from the district about what happened and that other parents had experienced problems with the third-party company hired by Dearborn. "The district is committed to addressing the safety needs of all current and future students and our HR department launched an investigation the very next morning to gather the facts surrounding this event," David Mustonen, a district spokesman, wrote to the Free Press in May 2022. Last month, Mustonen confirmed the district no longer contracts with the bus company district officials said was involved in the incident.

- A Detroit mom settled a lawsuit in Wayne County Circuit Court claiming that her 6-year-old son was restrained by a bus driver in late 2021. A video showed the driver sitting on the child, according to the suit. The driver, with a company contracted by Detroit Public Schools Community District, told the mother that her son was being "aggressive" on the bus, according to the lawsuit. The mother claimed Detroit Public Schools Community District administrators did not immediately share details of the incident with her but did open an investigation into the incident. The mother instead discovered the details after a video from that day was posted on Facebook. ABC Transportation, the bus company, in court filings wrote that it is "not liable for the criminal actions of its employees." Parties reached a settlement in the case for an undisclosed amount in July.

- Through his family, a then-13-year-old Walled Lake Consolidated Schools student with autism sued Dean Transportation after he was attacked by another student in September 2017 on the way home from school. The student who attacked him gouged his face and thrashed at his head. A bus aide and driver ignored his screams and didn't contact his parents, even though he walked off the bus with blood running down his face, the lawsuit claimed. A jury found that the transportation company was negligent, awarding \$10,000 in the student's favor.

In Macomb County, Angela Uselman said her daughter Abby was bullied on the bus by a group of students and attacked by one student as they waited to get onto the bus. The November 2022 attack happened after Abby and the other student yelled at each other, Uselman said. Abby attends L'Anse Creuse High School North. Uselman said that the student who attacked Abby was allowed to ride the same bus after the attack.

"Because of her autism, Abby still to this day doesn't understand what she did so wrong. ... She screamed back at them and she got literally her head pounded," she said.



Paisley Fox, left, Charlie Fox, Leah Thomas and Sarah Fox stand inside the office at Charlie's school in Lapeer. Charlie, who is autistic, was left on a school bus for over an hour in 2019 before she was found. Thomas is Charlie's paraprofessional.

PHOTOS BY DAVID RODRIGUEZ MUNOZ/DETROIT FREE PRESS



Charlie Fox, left, walks alongside her mom, Sarah Fox, outside of their home in Lapeer. When Charlie was 5, in 2019, she was lost on a Lapeer Schools bus. "I wouldn't wish what happened to me and my child to happen to any other parent, especially another special needs parent," Sarah Fox said.

Abby attends school and rides the bus with other high school students, she is not in a self-contained program and many don't realize she's autistic at first, her mother said. Uselman noted that the district has improved its bus services recently, but wishes the district routinely assigned an aide to every high school bus.

"Older kids tend to be more rowdy, more vocal, more disruptive," she said. "Why are we not preemptively saying, 'You know what, it's a good idea to have someone on here because this bus driver who's supposed to be focusing on the road to get these kids to and from school alive can't do everything?'"

Erik Edoff, superintendent of L'Anse Creuse Public Schools, wrote in an email that the district requires training for all drivers and aides who work with students with disabilities.

"This is important for students with emotional as well as medical needs," he wrote.

What training is necessary?

Melissa Freel remembers the fear that washed over her son Bennett's face when his school district sent an empty school bus to pick him up and take him to Edison School in Ferndale in 2018. One morning, he didn't want to leave the house, Freel said. Before he exited, Freel asked the bus driver to understand that getting onto the bus was a big deal for her son, and it would ease Bennett's anxiety if the driver acted like they knew Freel.

Bennett walked out, and Freel said the driver asked, "Oh, by the way, where am I going?" Eventually, Freel started driving Bennett herself.

Small interactions like that one can throw any child off, especially first thing in the morning.

Katrina Morris, executive director of the Michigan Association for Pupil Transportation and transportation director for the West Shore Educational Service District in Ludington, teaches a class for transportation supervisors about serving students with disabilities. Drivers and aides can't take behavior personally, she said. And communication with students is key.

"They're trying to tell you something in their way," Morris said. "We just have to figure out what it is."

Bus aides must have medical training. Some districts also include aides and drivers in Crisis Prevention Intervention training to learn how to de-escalate situations and identify what triggers a student's behaviors, Morris said.

"You have to learn the child: It's not about the disability," she said. "We really stress that what works today, 99% probably is not going to work tomorrow. And tomorrow we're going to come right back to the drawing board and we're going to try something different."

A spokesman for the Michigan Department of Education wrote that bus drivers must attend extensive training to become drivers and maintain their credentials, including a class that involves learning about corporal punishment, restraint and seclusion laws, and must undergo a background check.

But Michigan is also what's known as a local control state, and "any reports involving students (e.g., neglected or mistreated) on buses are the responsibility of local districts," wrote William Disessa, a spokesman for the Michigan Department of Education. That means in the event of an incident, it's up to a local school district to investigate.

For years, school districts have been grappling with a shortage of staff members, including a bus driver shortage and a shortage of paraprofessionals, aides who work with students

with disabilities.

In the Dearborn case, the mother said the staff on her son's school buses, operated by a private company, seemed to rotate and that they appeared to lack training to work with students with disabilities.

The University of Southern California researchers questioned the use of private companies for transporting students with disabilities, writing that outsourced transportation appears to make it harder to identify who is accountable for preventing incidents. In one instance in New Jersey, the researchers found a district that switched transportation companies three times after three different incidents.

Colleen Allen, CEO and president of the Autism Alliance of Michigan, wrote in an emailed statement that the organization is "devastated" by the assault claims in Ann Arbor and that it will "continue to advocate for effective safety and behavioral training for any professional who interacts with children with autism and related disabilities, whether that occurs in the school building, on the playground, lunchroom, or a school bus. Until education and training is provided, we will continue to see these types of cases across Michigan."

At Detroit Public Schools Community District, spokeswoman Chrystal Wilson wrote that while the district uses a third-party company, the training for drivers and attendants who serve students goes beyond state requirements, including Positive Behavioral Interventions and Supports program training and training around working with students with disabilities. In Zyair's case, Wilson wrote, "the driver was immediately removed from DPSCD service."

White, the bus driver who didn't deploy her stop sign or lights after dropping Zyair off on the opposite side of the street, was found guilty in March of child abuse in the second degree and failure to stop at the scene of a personal injury accident. White was sentenced to three years of probation and 200 hours of community service, according to court records.

Jones also settled a lawsuit in Wayne County Circuit Court against White and ABC Student Transportation for an undisclosed amount. But she does not feel justice has been done.

"There was a lot that she could have did to prevent it," she said of White.

In a recent Facebook post, Jones noted that Oct. 20 is Zyair's birthday and wrote: "I'm not ready for it."

Contact Lily Altavena: Laltavena@freepress.com.

DTE PUBLIC MEETING RIVER ROUGE CITY HALL OCTOBER 12, 2023; 5-7 P.M.

DTE will host a public meeting concerning the River Rouge Power plant Bottom Ash Basin Coal Combustion Residuals Unit and DTE's assessment of corrective measures for the surface impoundment under the Coal Combustion Residuals rules. During the meeting DTE will have informative poster boards placed around the room to review and discuss. The information presented will include work completed to date to remove all coal ash and close the surface impoundment, data compiled about the surface impoundment, and our assessment of corrective measures.

The public meeting will be held from 5-7 p.m. at the River Rouge City Hall in the court room on the second floor, 10600 W. Jefferson Ave. in River Rouge.





City of River Rouge

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- CITY COUNCIL
- COMMUNITY
- ONLINE SERVICES

Past Notices

DTE will host a public open-house meeting
 October 12th 5pm to 7pm
 2nd-floor courtroom
 City Hall at 10600 W. Jefferson Ave.
 This is required by EGLE regarding
 arsenic at the DTE River Rouge Power Plant.

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