



October 21, 2025

Director Phillip Roos
C/o Delegated Representative Christine Matlock, State Solid Waste Coordinating Engineer
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Constitution Hall, Floor 4
525 West Allegan Street Lansing, MI 48913

Extension of Closure Timeframes – Monroe Power Plant Bottom Ash Impoundment

Director Roos,

Pursuant to 40 C.F.R. §257.102(f)(2), DTE Electric Company (DTE Electric) is submitting this extension of closure timeframes demonstration to acknowledge the additional time necessary to close the Monroe Power Plant (MONPP) Inactive Bottom Ash Impoundment (BAI). Per 40 C.F.R. §257.102(f)(2)(i), the timeframes for completing closure of a CCR unit may be extended if the owner or operator demonstrates that it was not feasible to complete closure of the CCR unit within the required timeframes. As specified in §257.102(f)(2)(i), the following factors may be considered to support closure timeframe extensions:

- A. Complications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season;
- B. Time required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or the characteristics of the CCR in the unit;
- C. The geology and terrain surrounding the CCR unit will affect the amount of material needed to close the CCR unit; or
- D. Time required or delays caused by the need to coordinate with and obtain necessary approvals and permits from a state or other agency.

The following narrative clearly demonstrates that it was infeasible to complete closure within the allotted timeframe. As documented in the *Closure Plan for Inactive Bottom Ash Impoundment* (Rev. 3, October 21, 2025), DTE Electric initiated closure of the Bottom Ash Impoundment (BAI) on October 21, 2020, by ceasing receipt of non-CCR wastewater. Site preparation activities commenced in April 2021 following contract award and the conclusion of winter weather conditions. These activities included installation of erosion and sediment controls, construction of access roads, installation of a truck scale and truck wash station, and development of an 8.5-acre multistage sediment dewatering system.

Hydraulic and mechanical dredging operations and other closure activities began in June 2021 and have continued through the present. Between June 2021 and October 21, 2025, approximately 824,476 cubic yards of material were excavated and transported to a permitted CCR landfill for final disposal. Dredging activities typically occurred between March and November, contingent on seasonal weather constraints.

As of October 21, 2025, DTE Electric is awaiting final verification that all CCR material has been removed from the BAI. Additionally, closure cannot be deemed complete under 40 CFR §257.102(c) until groundwater protection standards for Appendix IV constituents are achieved—either during the active life of the CCR unit per §257.102(c)(1), or during the post-closure care period per §257.102(c)(2).

Given the substantial volume of material requiring removal, the extended construction timeline spanning multiple winter seasons, and the necessity of confirming compliance with groundwater protection standards after removal of material, it was not feasible to complete closure of the BAI within the original timeframe specified under §257.102(f). Accordingly, DTE Electric is exercising the self-certification provision to extend the closure deadline by two years. The certification required under §257.102(f)(2)(iii) is provided below.

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Robert Lee

Manager – Environmental Strategy

10/21/2025