



June 20, 2025

Director 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 – River Rouge Power Plant Bottom Ash Basin

Director Roos,

Pursuant to 40 CFR §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 River Rouge Power Plant (RRPP) Bottom Ash Basin (BAB). Per 40 CFR §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.

DTE Electric initiated closure of the BAB on June 22, 2020. Removal of CCR from the BAB was completed in September 2020. Although DTE Electric completed removal of all CCR, closure is not considered complete under 40 CFR §257.102(c) until groundwater protection standards are achieved for Appendix IV constituents during the active life of the CCR unit per 40 CFR 257.102(c)(1) or during the post-closure care period per 40 CFR 257.102(c)(2).

DTE Electric is actively implementing the corrective action process required by the CCR Rule to address concentrations of one or more metals in groundwater downgradient of the BAB that exceed the established groundwater protection standards post-CCR removal; however, not all components of the remedy can be constructed at this time. A Remedial Action Plan (RAP) was submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on December 19, 2023, and DTE Electric is still negotiating approval of the RAP. Therefore, due to pending EGLE approvals, it is not feasible to fully implement the remedy within the initial five-year **required timeframe (i.e. by June 22, 2025) due to factors beyond DTE Electric's control**, specifically, the time required, or delays caused by the need to coordinate with and obtain necessary approvals from a state agency, as contemplated by 40 CFR 257.102(f)(2)(i)(D). Accordingly, this demonstration documents the need to extend the timeframe for closure by two years, as allowed under 40 CFR §257.102(f)(2).

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
June 20, 2025