Prepared for

DTE Electric Company
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2025 ANNUAL INSPECTION REPORT
RANGE ROAD LANDFILL

BELLE RIVER POWER PLANT

China Township, Michigan

Prepared by

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1. INTRODUCTION

1.1 Overview

This 2025 Annual Inspection Report (AIR) was prepared by Geosyntec Consultants of Michigan, Inc. (Geosyntec) to provide the results of the annual inspection of the coal combustion residuals (CCR) Range Road Ash Disposal Facility (Landfill or RRLF) at DTE Electric Company's (DTE) Belle River Power Plant disposal facility. The annual inspection was performed to comply with the United States Environmental Protection Agency (USEPA) CCR Rule, as amended. Under the CCR Rule, the Landfill is an "existing landfill" per 40 CFR 257.53 and must be inspected by a qualified professional engineer on an annual basis.

The Landfill is located approximately one mile north of the Belle River Power Plant (Plant) in China Township, Michigan, and is bounded on the east by Range Road, on the south by Puttygut Road, on the east by King Road, and on the north by private properties (Figure 1). The Landfill is west of the St. Clair River between Lake Huron and Lake St. Clair.

Filling operations at the site began in the 1950s. The Landfill has had an operating license since 1966 with the Michigan Department of Environment, Great Lakes, and Energy (EGLE), formerly Michigan Department of Environmental Quality (MDEQ), as a Coal Ash Landfill. The current operating license issued to DTE is Number 9781 and the EGLE Facility waste data system (WSD) number is 392562.

1.2 Purpose

The objective of the inspection is to detect indications of instability in time to allow planning, design, and implementation of appropriate mitigation measures. The purpose of the inspection under the CCR Rule [40 CFR 257.84(b)(1)] is:

"…to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards."

The inspection must, at a minimum, include:

(i) A review of the available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of an inspection by a qualified person, and results of previous annual inspections); and

(ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.

The purpose is accomplished through periodic visual inspection (and photo-documentation) of the Landfill, review of the previous inspection, review of construction certification documentation, review of available operating records, review of instrumentation monitoring data, and discussions with site personnel about the history of the site and general operations at the Landfill. Observations from the visual inspection, document and instrumentation data review, and discussions are summarized in an inspection report. The inspection report addresses the following under the CCR Rule [40 CFR 257.84(b)(2)]:

(i) Any changes in geometry of the structure since the previous annual inspection;

(ii) The approximate volume of CCR contained in the unit at the time of the inspection;

(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and

(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

1.3 Report Organization

The remainder of this report is organized as follows:

- Section 2 - Review of Available Information: summarizes various historical documents that were reviewed as part of this inspection.
- Section 3 - Facility Description: provides information about the facility.
- Section 4 - Observations from Visual Inspection: summarizes visual observations recorded during the 2025 inspection of the Landfill.
- Section 5 - Instrumentation Monitoring: provides information about the instrumentation monitoring of the Landfill.
- Section 6 - Current Operations: describes DTE's current operations.
- Section 7 - Evaluation of Observations: based on the inspection results, evaluates if the design, construction, operation, and maintenance of the Landfill are consistent with recognized and generally accepted good engineering standards.
- Section 8 - Conclusions: provides the overall conclusions of the annual inspection and certification of the AIR.

1.4 Terms of Reference

The annual visual inspection was performed on May 5, 2025, by Dr. Clinton Carlson, Ph.D., P.E. of Geosyntec, and Dr. Jorge Romaña Giraldo, Ph.D. of Geosyntec. This report was prepared by Dr. Carlson and Dr. Romaña Giraldo with input by Mr. John Seymour, P.E., of Geosyntec. Dr. Carlson is the qualified professional engineer per the requirements of §257.53 of the CCR Rule. He has over ten years of experience with coal ash related projects and his resume is provided in Appendix A.

2. REVIEW OF AVAILABLE INFORMATION

Geosyntec reviewed the following documents for the 2025 annual inspection. These documents are summarized in the table below. References refer to TRC Environmental Corporation (TRC), NTH Consultants, Ltd. (NTH), and AECOM.

Table 1: Available Information Reviewed for 2025 Annual Inspection

Title	Prepared by	Date	Content
Landfill Development Plan	TRC	November 2013	Overall development plan for Landfill including design, construction, surface water management, operation, monitoring, and site closure. Plan remains unchanged.
Construction Certification /Soil Verification (Area G2) Range Road Landfill	MDEQ	September 2015	MDEQ authorization for waste placement in Area G2 Northern Portion (Phase I).
Surface Water Flow Figure 2 (Working Copy)	TRC	December 2015	Plan of ditch and surface flow directions and staff gauge and piezometer locations. Figure 2 in annual inspection report.
Closure Plan	AECOM	October 17, 2016	Closure plan description, inventory and area estimates, schedule, and PE certification. Plan remains unchanged.
Post-Closure Plan	AECOM	October 17, 2016	Post-closure plan description, monitoring and maintenance, owner operator requirements, and PE certification. Plan remains unchanged.
Groundwater Monitoring System Summary Report	TRC	October 2017	Information on groundwater monitoring system components and details for the Landfill.
Groundwater Statistical Evaluation Plan	TRC	October 2017	Basis for statistical evaluation for groundwater monitoring events for the Landfill.

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Table 1: Available Information Reviewed for 2025 Annual Inspection

Title	Prepared by	Date	Content
DTE Energy Company RRLF Area G2 Phase II Base Liner Construction Plans	NTH	March 2018	Area G2 Phase II base liner construction plans. Plans remain unchanged.
Copy of Construction Drawings for G2 Phase 2 Base Liner	NTH	April 23, 2018	Area G2 Phase II baseline construction drawings.
DTE Range Road Waste Filling Sequence with RRLF Estimated Life Expectancy and Capacity Summary	NTH	April 2018	Ash volumes and estimated fill volumes for closure of Areas G2 Phases I, II & III, and Area F3/D3. Estimated dates for closure start provided. Plan remains unchanged.
Partial Closure Certification (Area F3)	MDEQ	May 22, 2018	Approval letter for partial closure of Area F3. No updates since 2018.
Certification of Base Liner Grades (Area G2-13.1 Acres) DEQ Review Letter	MDEQ	September 2018	MDEQ's review indicating certification is consistent with the requirements of Part 115. This is Area G2 Phase II reported as 13 acres in current operating license.
NPDES Permit No. MI0038172	MDEQ	October 2018	Permit for discharge from the Belle River Power Plant and Blue Waters Energy Center to the St. Clair River.
Location Restrictions Demonstration	TRC	October 2018	Provides details of location restrictions demonstration for the Landfill per the CCR Rule.
Run-On/Run-Off Control System Plan for CCR Disposal Facility-Range Road	AECOM	October 15, 2021	Describes the run-on and run-off control features for the Landfill. Documents how the plan meets the CCR Rule. Provides a five-year update to the original plan submitted in October 2016.
Fugitive Dust Control Plan	DTE	November 8, 2021	Presents fugitive dust control measures. Added operating license information and further

Table 1: Available Information Reviewed for 2025 Annual Inspection

Title	Prepared by	Date	Content
			defined activities for assessing and monitoring effectiveness of dust control measures.
Construction Documentation Report – Area G2 Phase I Closure	NTH	January 18, 2022	Construction documented and certified by licensed professional engineer.
Construction Certification/Soil Verification Area G2 Phase III	EGLE	April 7, 2022	Approval of supplemental certification of base liner grades (waste placement) for Area G2 Phase III.
Area G2 Phase I Closure Certification Approval	EGLE	May 6, 2022	Closure certification Reviewed by MMD and approved by EGLE.
2023 Annual Inspection Report	Geosyntec	January 9, 2024	Provides results of the 2023 annual inspection.
Weekly General Inspection Logs	DTE	May 2024 to November 2025	Qualified person inspections from May 2024 through November 2025.
Quarterly Hydrogeologic Monitoring and Performance Monitoring Reports	TRC	October 2024 to June 2025	Groundwater contour maps and elevations outside and inside of slurry wall. Perimeter ditch water elevations at staff gauge locations.
2024 Annual Inspection Report	Geosyntec	January 9, 2025	Provides results of the 2024 annual inspection.
Annual Groundwater Monitoring Report	TRC	January 31, 2025	Summary of annual groundwater monitoring results for 2025 for the Landfill.
2025 Site Plan Figure 1 of DTE Range Road Operating License Number 9781	TRC	February 28, 2025	Landfill area site plan showing locations, designations, status and phasing legend. Figure 1 in annual inspection report.
Range Road Solid Waste Disposal Area Operating	DTE	February 28, 2025	Operating license renewal application for the Landfill. See below.
EGLE MMD Inspection Letters	EGLE	July 2025 to September 2025	Facility reported to be in compliance with state regulations.
DTE response to EGLE MMD Inspection Letters	DTE	August 2025 to October 2025	DTE responses to EGLE comments.

Table 1: Available Information Reviewed for 2025 Annual Inspection

Title	Prepared by	Date	Content
Range Road Ash Disposal Operating Number and License Facility No. 392562 License No. 9781	EGLE	September 24, 2025	Solid waste disposal area operating license, including terms and conditions. License is active and supersedes the previous operating license (No. 9781).
Annual Fugitive Dust Report	DTE	November 10, 2025	Annual report of dust control actions, any complaints, and corrective actions taken, if any. Completed pursuant to 40 CFR 257.80(c).

3. FACILITY DESCRIPTION

3.1 Overall Site Description

The facility property has an area of 514 acres, of which 447 acres are designated for landfill development. The Landfill has 14 operating and planned phases (or work areas) as discussed in the Landfill Development Plan, design drawings, and draft drawings and memorandums on RRLF waste filling sequence. The status and areas of the work areas are summarized in Table 2 and shown in Figure 1. Figure 1 is taken from the 2021 Site Plan.

Table 2: Site Phasing Summary

Work Area	Status	Size (Acres)	Comments
A	Closed	7	Certified closed May 17, 2002
B	Closed	102	Certified closed prior to September 2, 1999
B1	Closed	9	Certified closed prior to September 2, 1999
C	Closed	16	Certification report approved August 25, 2009
D1	Closed	21	Certification report approved August 25, 2009
D2	Closed	10	Certification report approved August 25, 2009
D3	Active	6	Interim cover placed at time of annual inspection
E	Unconstructed	117	No construction or waste placed in Area
F1	Closed	17	Certification report approved January 4, 2010
F2	Closed	12	Certification report approved February 28, 2013

Table 2: Site Phasing Summary

Work Area	Status	Size (Acres)	Comments
F3	Closed	17	Reported certification approval
F3/D3	Active	3	Active per operating license dated September 2025
G1/G3	Unconstructed	56	No construction or waste placed in Area
G2	Active	54** (Total Permitted)	
Phase I	Closed	16	Certification report approved May 6, 2022
Phase II	Active	19	Active waste placement
Phase III	Active	19	Liner construction completed and permitted for waste placement

** Acreage from DTE renewal permit application

Currently, ten work areas are certified as closed and three areas are active. Areas D3, the remaining phases of G2, and F3/D3 are active as identified in Figure 1. For construction purposes, Area G2 has been subdivided into three phases. Plans for Area G2 Phases I, II, and III have been approved by EGLE for waste placement. Area G2 Phase I was filled, capped, and certified by NTH and approved by EGLE. Area E was not included in the current waste filling sequence overall site plan (Draft September 26, 2017) and may not be needed depending on actual future volumes of CCR received by the Landfill. However, Area E is still identified in the current operating license (No. 9781).

The Landfill includes perimeter ditches, roadways, a perimeter slurry wall, earth berms, a 10-acre National Pollutant Discharge Elimination System (NPDES) Stormwater Detention Basin (SDB), and basin pump house. The SDB has also been referred to as the sedimentation basin in some of the reviewed documents and figures. The SDB is located in the southeast corner of the property. The Landfill has a native, in situ clay liner ranging from 86- to 188-feet (ft) thick present beneath the Landfill footprint. A thin, discontinuous, shallow sand seam is present beneath the northeastern portion of the Landfill; however, a slurry wall and perimeter ditch system were designed and installed to preclude any off-site flow from the sand seam. The slurry wall, installed to

approximately 10 to 15 ft deep, surrounds the entire Landfill along the property perimeter. The perimeter ditch surrounds the entire Landfill and drains to the SDB (Figure 1).

The Landfill is a dry-handled (conditioned) CCR landfill licensed by EGLE as a coal ash landfill under Michigan Part 115 with operating license No. 9781. The Landfill has maximum final cover side slopes of four horizontal to one vertical (4H:1V) and side slopes of three horizontal to one vertical (3H:1V) or flatter for interim covers.

3.2 Design

The Landfill design and operation is summarized in the Landfill Development Plan, Remedial Action Plan, Run-on/Run-off Control System Plan and the quarterly monitoring reports. The key components of the Landfill include the following.

- Perimeter slurry wall that is approximately 10 to 15 ft deep and keyed into an 86- to 188-ft-thick native, in situ clay liner.
- Perimeter drainage ditch capturing surface stormwater and near surface groundwater.
- SDB with an area of ten acres that collects water from the perimeter drainage ditch and pumps it to the Plant.
- Two groundwater capture systems outside the facility property that collect water from the shallow sand seam.
- Final cover system that includes (from top to bottom):
    - 6-inch-thick vegetated topsoil layer (erosion layer); and
    - 24-inch-thick clay layer with hydraulic conductivity (k) less than or equal to $1x10^{-7}$ centimeters per second (infiltration layer).
- The final cover system has the following slopes.
    - Maximum 4H:1V side slopes.
    - Minimum 1% slopes on the top deck of closed areas.
    - Minimum 2% slopes on the top deck of areas to be closed in the future.

Landfill design and construction are supported by construction phasing plans, surface water management plans and details, site operation (waste placement) plans and details, and leachate and environmental monitoring plans and reports. Additionally, landfill monitoring systems,

maintenance and inspection, and site closure and post-closure plans with long-term care procedures support the Landfill design and construction.

3.3 Construction

The Landfill has been operating since the 1950s. The Landfill operating license discusses the work areas (Section 3.1), references design, construction, and monitoring documents submitted by DTE, and includes conditions and criteria required for the Landfill operation, phase construction, and monitoring. A renewal permit (No. 9781) effective September 24, 2025, was issued to DTE by EGLE. Closure and Post Closure Plans in accordance with 40 CFR 257.102 (b) and 40 CFR 257.104, respectively, have been prepared with an operating record date of October 17, 2016. A permit for NPDES discharge of storm water from SDB has been issued by EGLE.

The Landfill Development Plan discusses site operations in Section 4 of the plan. Included are discussions on dust control, noise control, odor control, and access and security requirements, among other operating aspects. CCR fill procedures and requirements for construction observation and documentation are also included in the development plan.

During 2025, the Landfill accepted bottom ash, fly ash, and waste coal from the Belle River Power Plant. The approximate annual CCR disposal rate is 100,000 in-place cubic yards/year; however, the disposal rate varies dependent upon volume of CCR sold for beneficial use. The currently permitted areas of the Landfill are expected to handle the anticipated volume of CCR through the life of the Landfill.

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4. VISUAL INSPECTION RESULTS

Inspection results and photographs from the annual visual inspection are provided in Appendix B. The visual observations are summarized below.

1. The SDB was in good condition. The side slopes of the SDB had some vegetation, particularly on the north side, but no signs of erosion (Photographs #1, #2). The trash rack for the SDB outlet was in good condition and mostly clear of vegetation that could impede water flow (Photograph #3). The water quality within the SDB appeared to be appropriate for the NPDES permit (Photographs #1, #2, #3). The maintenance program includes the regular removal of vegetation from both the trash rack and the side slopes of the SDB.

2. The pump house for the SDB was not accessed during the inspection. However, personnel from DTE reported that the pumps are operational (Photograph #4).

3. The perimeter and haul roads were generally in good condition, with minimal rutting observed (Photographs #5, #15, #19, #34, #61). However, low spots on the perimeter road at the northwest corner of the site were observed to have puddles (Photographs #25, #27). Despite this, the ability to use the roads for access around the site was not impacted. DTE personnel maintain the roads by filling low spots with aggregate as part of the maintenance program. Along the west side of the property, the roads were not covered with aggregate (Photograph #37), but they remained accessible, though not traveled during the inspection.

4. The monitoring wells and piezometers along the perimeter road were observed to be in good condition (Photographs #6, #18). Many of the wells and piezometers were protected by bollards to prevent damage from vehicles.

5. The perimeter ditch system was generally in good condition. During the inspection, water from recent precipitation was observed flowing in the proper direction within the perimeter ditches.

    i. The perimeter ditch leading to the SDB had some vegetation on the side slopes; however, no signs of erosion were observed (Photograph #7). The perimeter ditch on the east side of the Landfill had some vegetation along the slopes on the western side in several areas; however, no signs of erosion were detected. During the inspection, the flow within the perimeter ditch was observed to be directed appropriately toward the SDB (Photographs #8, #9, #11, #16).

    ii. The discharge pipe connected to the pump house on the east side of the Landfill for the perimeter slurry wall was in good condition and flowing during the inspection (Photograph #11).

iii. The perimeter ditch on the northeast side of the Landfill had well-maintained vegetation on the side slopes and no observed signs of erosion (Photographs #18, #19, #22, #23).

iv. The upper and lower perimeter ditches along the northwest side of the Landfill, adjacent to the lift station, were generally in good condition with some vegetation but no observed signs of erosion (Photographs #25, #29). The riprap armoring on the side slopes of the lower ditch had no observed signs of erosion (Photograph #29).

v. Some vegetation was noted along the perimeter ditch on the northwest side of the Landfill (Photographs #31, #34), which occasionally obstructed the visibility of the staff gauges (Photograph #32). However, no signs of erosion were observed on the side slopes or in the riprap armoring.

vi. The perimeter ditch on the west side of the Landfill had some vegetation. However, the riprap armoring on the side slopes showed no signs of erosion (Photograph #48).

vii. The perimeter ditch on the south side of the Landfill had some vegetation on the bottom of the ditch, but no erosion was observed on the side slopes (Photograph #57). No water was observed within the south perimeter ditch during the inspection.

viii. The various culverts and discharge pipes within the perimeter ditch system were generally in good condition and not obstructed (Photographs #13, #14, #23, #24, #35). Damage was observed in one corrugated metal culvert at the northwest corner of the Landfill; however, flow through the culvert did not appear to be obstructed (Photograph #30).

ix. The perimeter ditch system was observed to properly direct stormwater to the SDB during the inspection despite some vegetation at certain locations. As part of the Landfill maintenance program, vegetation in the perimeter ditch is cleared annually on a rotating basis (i.e., east side, then north side, then west side, then south side).

6. All staff gauges within the perimeter ditch were located, and most were in satisfactory condition (Photographs #9, #13, #17, #18). Staff Gauge-06 on the east side of the Landfill had been damaged and was lying on the side slope of the perimeter ditch (Photograph #10). Vegetation within the perimeter ditch limited the visibility of some of the staff gauges along the northwest side of the Landfill (Photograph #32). DTE personnel have placed markers along the perimeter road to indicate the locations of the staff gauges; however, some of these markers have been damaged.

7. The security fences and gates were locked and generally in good condition (Photographs #12, #36). The perimeter fence was damaged in a few locations along the north side

(Photograph #21), northwest corner (Photograph #28), and the northwest side (Photograph #33).

8. The perimeter slurry wall is located below ground and thus, could not be visually inspected. The markers around the perimeter of the Landfill indicating the location of the slurry wall were observed and generally in good condition.

9. Trees are present along the slopes on the northeast, north, and northwest sides of the Landfill located in Areas A, B, and B1 (Photographs #16, #19, #22, #25). MDEQ (now EGLE) approved leaving the trees in place along these slopes. No signs of slope instability were observed along these slopes.

10. Some seepage was observed at the toe of the slopes on the north side of the Landfill in Area B (Photograph #20). There were no indications of slope instability near this seepage.

11. The lift station located at the northwest corner of the property was observed to be in good condition, including the control panel, hoist, and concrete pad (Photograph #26). No obstructions were observed within the lower perimeter ditch (Photograph #29) or at the discharge pipe to the upper perimeter ditch (Photograph #24) and flow was observed in the proper direction. The sump and pumps for the lift station and the manhole for the upper perimeter ditch were not inspected.

12. The side slopes and top deck in Areas F3 and B (Photographs #38, #56), Areas D2 and D3 (Photograph #39), Areas C and D1 (Photograph #40), Area F1 (Photographs #44, #45, #52), Area F2 (Photograph #52), and Area G2 Phase I (Photographs #50, #52) were in good condition. The vegetation in these areas was well-maintained. No erosion or indicators of slope instability were observed along the side slopes. No low spots with water ponding were visible along the top deck during the inspection.

13. A small erosion gully was observed along the top deck where Areas B, B1, and C join (Photograph #41). No water was flowing within the gully during the inspection.

14. The stormwater downchute at the southwest corner of Area F1 has had the riprap along the left side (facing downslope) eroded, resulting in damage to the mesh wiring around the riprap (Photograph #47). It appears finer soil particles have been transported from the mid-slope to the bottom of the downchute (Photograph #49). The erosion at the downchute appears to have progressed slightly over the last year. The riprap at the top of the stormwater downchute was in satisfactory condition with some vegetation but no erosion observed (Photograph #46).

15. The other stormwater downchutes between Areas B and D1 (Photograph #42), between Areas B and F1 (Photograph #43), and within Area G2 Phase I (Photographs #54, #55)

were generally in good condition. The downchute between Areas B and D1 had some vegetation at the inlet; however, stormwater was observed flowing into the inlet during the inspection (Photograph #42). The downchute located at the northwest corner of Area F1 also had vegetation at the top in the riprap, but this did not appear to obstruct the flow of stormwater (Photograph #43).

16. Active filling operations at the Landfill within Area G2 Phase II were observed during the inspection (Photograph #51). The traffic, material unloading, and placement were conducted in accordance with generally accepted engineering practices. The equipment was functioning safely and at controlled speeds to minimize the generation of fugitive dust. The side slopes of the active Area G2 Phase II were in good condition with no erosion or indicators of slope instability observed (Photograph #59). The diversion berm separating Area G2 Phase I and Phase II was observed preventing surface water from flowing onto the active Area G2 Phase II (Photograph #53). Area G2 Phase III was noted to be in good condition (Photograph #58); although not observed during the annual inspection, this area has begun active filling.

17. The access roads to the top of the Landfill in Area D3/F3 (Photographs #39, #56) and Area G2 Phase I (Photograph #55) were in good condition with no observed erosion or rutting.

18. The detention ponds near Area D3/F3 (Photograph #56) and south of Area G2 (Photograph #60) were in good condition. The side slopes have vegetation or riprap armoring, and there were no signs of erosion.

5. INSTRUMENTATION MONITORING

5.1 Surface Stormwater and Groundwater Collection

Surface stormwater and groundwater monitoring are conducted under a monitoring plan approved by EGLE. The stormwater that falls within the Landfill footprint and the perimeter ditch is collected by the ditch and flows, for the most part, by gravity to the SDB, as shown in Figure 1. Water within the perimeter ditch located at the northwest corner of the property is collected and pumped to the perimeter ditch on the north side of the Landfill which then gravity drains to the SDB. The perimeter ditch also collects shallow groundwater that occurs within the shallow sand seam above the native clay layer along the east side of the property. The slurry wall along the property line outside of the perimeter ditch acts as a groundwater flow barrier and directs any shallow groundwater to the perimeter ditch along the east side of the Landfill.

Monitoring of the surface stormwater and groundwater collection is accomplished through visual inspection of the perimeter ditch slopes and bottom, maintenance of the perimeter ditch, review of water elevations from a series of 13 staff gauges, and implementation of EGLE-approved monitoring plans. Results of the monitoring are summarized in tables prepared by TRC. The water levels for the staff gauges within the perimeter ditch reported in TRC's quarterly Hydrogeologic Monitoring and Performance Monitoring Reports indicate that the water is properly flowing towards the SDB. Stormwater within the perimeter ditch system on the east and north sides of the Landfill was observed flowing towards the SDB during the visual inspection.

5.2 Groundwater Elevations and Offsite Capture System Monitoring

Monitoring well and piezometer locations and measured water elevations are presented in reports prepared by TRC. The groundwater elevations and contour maps presented in TRC's quarterly Hydrogeologic Monitoring and Performance Monitoring reports demonstrate inward gradients toward the perimeter ditch within the property. Groundwater elevations and contour maps presented in TRC's reports indicate the perimeter slurry wall and perimeter ditch continue to mitigate the shallow groundwater flow from beneath the Landfill to outside the facility properly line. DTE personnel also monitor the flow within the perimeter ditch and includes a figure showing ditch flow directions as part of their quarterly inspection reports.

6. CURRENT OPERATIONS

6.1 Operations Organization

The Landfill is operated by DTE. The responsible personnel include:

- Mark Chesney – DTE Energy Supply, Plant Manager, Belle River Power Plant
- Frank Knowles and Narmeen Qureshi – DTE Environmental Management and Safety (EM&S), Belle River Power Plant

6.2 Operation Activities

Operations are defined in Section 4 of the Landfill Development Plan. The following operation control measures are described in the plan:

1. Hours of Operation
2. Waste Types
3. Traffic Routing
4. Lines and Grades
5. Nuisance (e.g., dust, odors, noise) Control
6. Police and Fire Protection
7. Access Control
8. Inclement Weather Operations
9. Drainage and Erosion Control
10. Recordkeeping
11. Personnel and Equipment
12. Ash Filling Procedures
13. Leachate Management
14. Environmental Monitoring

Engineering design and construction related to the Landfill design, waste type and volumes, subbase grades, site phasing, final cover, surface water management, construction observation and documentation, and final closure and long-term care are included in the Landfill Development Plan. The activities specified in the Landfill Development Plan appeared to be properly followed at the Landfill.

In addition, the following plans and inspections are currently being completed as required by the CCR Rule.

- Weekly inspections by a qualified person.
- Dust control in accordance with a Fugitive Dust Control Plan.
- Annual Fugitive Dust Control Report.
- Run-on/Run-off Control System Plan.
- Annual Groundwater Monitoring and Corrective Action Report.
- Closure and Post-Closure Plans for the Existing CCR Unit.

6.3 Run-On/Run-Off Control System Plan for CCR Disposal Facility Observations

Run-off for the Landfill is controlled by the perimeter ditches. The perimeter ditches on the east, north, south, and west sides of the property were observed to be in good condition during the visual inspection. Although stormwater flow did not appear to be obstructed, one condition requiring maintenance was identified at the northwest corner of the Landfill within the perimeter ditch: a damaged corrugated metal culvert. Diversion berms and the grading of the cap on the Landfill direct stormwater flow away from active portions of the Landfill as part of the run-on control measures. Water was not observed flowing into the active portions of the Landfill during the visual inspection. The stormwater downchutes and diversion berms were observed to be functioning properly during the visual inspection.

6.4 Observations

Documentation was reviewed and it was observed that the operations were being performed in a method "…to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards" in accordance with the CCR Rule.

Operating control measures appeared to be compliant with the Landfill Development Plan. There is a full-time DTE guard shack or building near the entrance of the Landfill and the Landfill is surrounded by security fencing and locked gates.

7. EVALUATION OF OBSERVATIONS

The design, construction, maintenance, and current operations of the Landfill are consistent with recognized and generally accepted good engineering standards, based on available information. The Landfill was not observed to have any existing structural weaknesses or conditions disrupting the operation and safety during the annual inspection.

The Landfill pump stations and pumps, SDB, perimeter ditches, perimeter and access roads, side slopes, stormwater features, top deck, and interior ponds appeared generally well-maintained and in good condition overall. The stormwater within the perimeter ditches was observed flowing in the intended direction during the visual inspection. Furthermore, there were no indications that vegetation or any obstructions within the ditches and culverts obstructed the flow. After the visual inspection, an area on the southern slope of the active G2 Phase II eroded into the perimeter ditch on the south side of the Landfill (Photograph #62) around June 2025. DTE has already removed the eroded material from the perimeter ditch, repaired the silt fence and reinforced it with straw bales (Photograph #63), regraded the area of erosion, and constructed a diversion berm at the crest of this slope to address this condition as documented in the October 2025 response to EGLE. No further action is required related to this condition.

The following conditions were identified during the annual inspection and should be addressed in the future to improve the overall efficiency of the Landfill.

1. The riprap-lined stormwater downchute located at the southwest corner of Area F1 has experienced increased erosion along the left side of the downchute (facing downslope) since the previous annual inspection that has distorted the wire mesh above the riprap. Finer soil particles were observed at the toe of the downchute and appear to have migrated from the left side of the downchute where the riprap has eroded.

2. A small seepage was observed at the toe of the side slope for Area B along the north side of the Landfill. The source of the seepage was not identified during the visual inspection. Rainfall prior to the visual inspection likely increased the amount of observed seepage.

3. A small erosion gully was observed along the top deck where Areas B, B1, and C join. The area around the gully was bare.

4. The corrugated metal culvert located at the northwest corner of the Landfill was damaged. During the visual inspection, stormwater flow was observed flowing through the culvert.

5. Puddles were observed at one low spot along the perimeter road located to the west of the lift station, at the northwest corner of the Landfill. The observed puddles appear to be the result of recent rainfall.

6. The perimeter fence has been damaged at three locations: the north side, northwest corner by the lift station, and the west side. On the north side of the property, the top rail was bent and the mesh was damaged creating a breach large enough to allow entry into the property. At the northwest corner and on the west side, the top rails were bent as a result of falling branches.

7. Staff gauge 06 located on the east side of the Landfill was damaged and lying on the side slope of the perimeter ditch. DTE repaired this gauge on May 15, 2025.

Geosyntec provides the following recommendations to address the observed conditions that are not part of routine maintenance at the Landfill.

1. The eroded riprap and cover soils and the damaged wire mesh within the stormwater downchute at the boundary between Areas F1, F2, and G2 require repair. The eroded area should be backfilled with suitable soil cover material and riprap, and the design grades of the downchute should be restored to the original design. The wire mesh above the riprap should either be removed or replaced. It is recommended that these measures be implemented within the next four years. The area should continue to be inspected for increased erosion until mitigation measures are implemented.

2. Regarding the observed seepage along the north side of the Landfill, no immediate action is recommended. DTE personnel should monitor the presence and amount of seepage at this location for any changes during the weekly inspections.

Other observed conditions that should be addressed within 2026 as part of routine maintenance at the Landfill include the following.

1. The small erosion gully observed along the top deck where Areas B, B1, and C join should be backfilled and vegetated to prevent the progression of erosion.

2. The corrugated metal culvert located at the northwest corner of the Landfill should be repaired or replaced to restore its hydraulic capacity.

3. The perimeter road to the west of the manhole associated with the upper perimeter ditch should be filled with aggregate to prevent puddles from forming and direct stormwater flow toward the lower perimeter ditch and lift station.

4. The security fence should be repaired at the damaged locations on the north, northwest, and west sides of the Landfill.

The Annual Fugitive Dust Control Report dated November 10, 2025, was reviewed. There were no citizen complaints from November 1, 2024, to October 31, 2025.

Weekly inspections are completed and documented by qualified personnel. Personnel were initially trained in April 2015, and new inspectors have been trained by DTE personnel as they have been hired. The inspection reports through November 2025 were reviewed by Geosyntec. No indications of structural weaknesses were identified by DTE personnel in the weekly inspections or by Geosyntec during review.

8. CONCLUSIONS AND CERTIFICATION

The design, construction, operation, and maintenance of the Landfill is generally consistent with recognized and generally accepted good engineering standards in accordance with the CCR Rule [40 CFR 257.84(b)(1)]. The 2025 annual visual inspection did not identify any structural instabilities that would cause CCR to release into the areas outside the footprint of the Landfill. Geosyntec identified conditions detailed in Section 7 requiring maintenance or monitoring. DTE has already addressed one of these conditions. Recommendations and timelines to address the remaining conditions are provided in Section 7 for DTE's consideration.

Certified by:

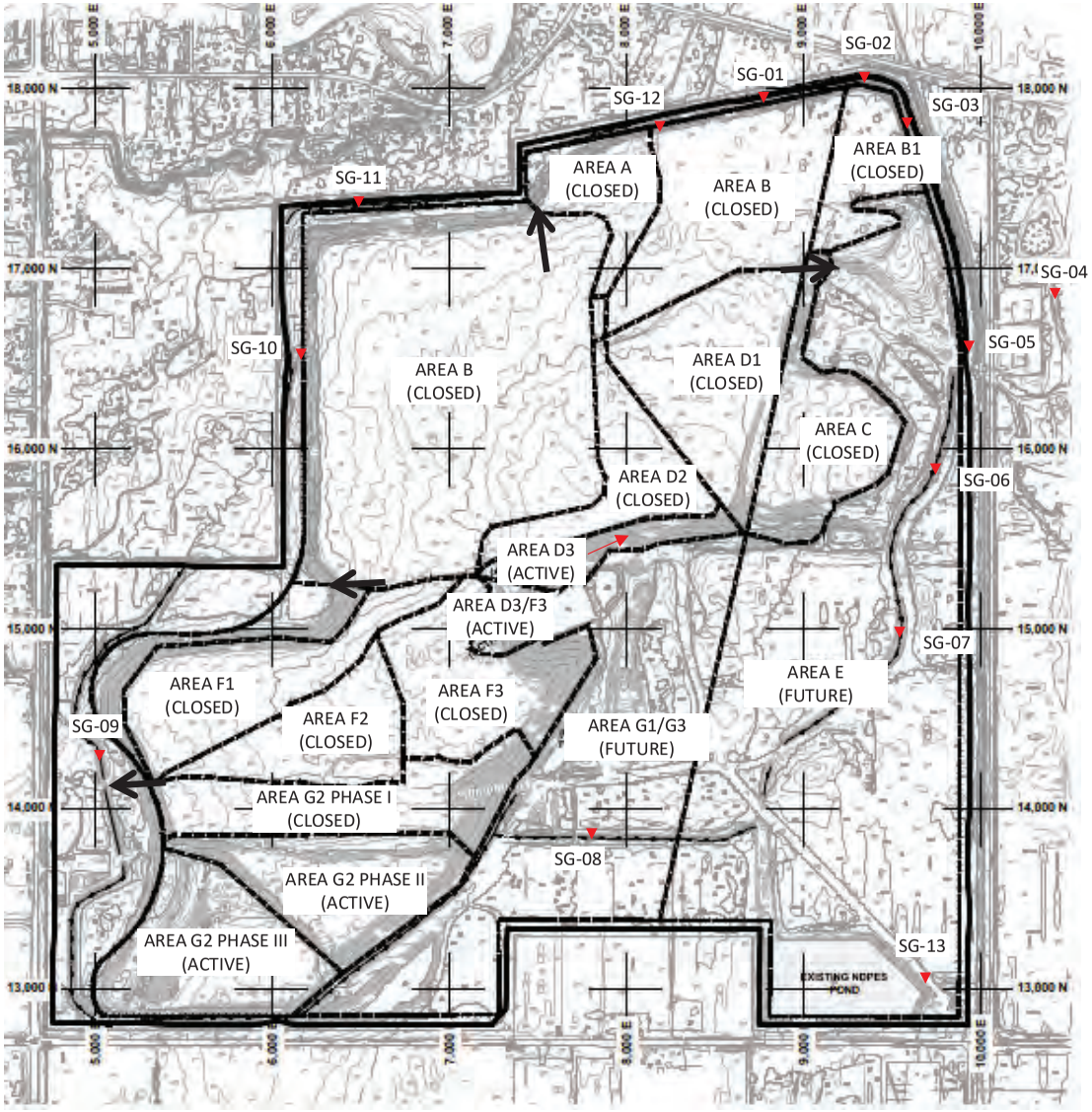
Digitally signed by Clinton Carlson
Date: 2026.01.09 11:47:23 -05'00'

Date January 9, 2026

Clinton Carlson, Ph.D., P.E.

Michigan P.E. License Number 6201066842

Project Engineer



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- DESIGNED LIMITS OF ASH FILL
- DISPOSAL AREA BOUNDARY
- SLURRY CUT OFF ALL DISPOSAL AREA (AREA E)
- SG-## STAFF GAUGE
- DOWNCHUTE

SITE PHASING LEGEND

AREA	STATUS	SIZE (ACRES)	MATERIAL UNDER WASTE	COMMENTS
A	CLOSED	7	CLAY	CERTIFIED CLOSED MAY 17, 2002
B	CLOSED	102	CLAY	CERTIFIED CLOSED PRIOR TO SEPTEMBER 2, 1999
B1	CLOSED	9	SAND	CERTIFIED CLOSED PRIOR TO SEPTEMBER 2, 1999
C	CLOSED	16	SAND	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
D1	CLOSED (INTERIM COVER ON SOUTHERN SIDESLOPES)	21	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
D2	CLOSED (INTERIM COVER ON SOUTHERN SIDESLOPES)	10	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
E	UNCONSTRUCTED WITH FINANCIAL ASSURANCE	117	SAND	CAN BE AUTHORIZED TO RECEIVE FILL ONCE A REMEDIATION PLAN IS IMPLEMENTED
F1	CLOSED	17	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, JANUARY 4, 2010
F2	CLOSED	12	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, FEBRUARY 28, 2018
F3	CLOSED	17	CLAY	CERTIFIED CLOSED MAY 22, 2018
D3	ACTIVE DISPOSAL	8	CLAY	INTERIM COVER AREA
F3/D3	ACTIVE DISPOSAL	3	CLAY	
G1/G3	UNCONSTRUCTED WITH FINANCIAL ASSURANCE	56	CLAY	
G2-PHASE I	CLOSED	16	CLAY	CERTIFICATION REPORT APPROVED BY EGLE, MAY 6, 2022
G2-PHASE II	ACTIVE DISPOSAL	19	CLAY	
G2-PHASE III	ACTIVE DISPOSAL	19	CLAY	

NOTE:
SITE MAP ADAPTED FROM FIGURE 1 BY TRC CONSULTANTS, LTD, MADISON, WISCONSIN, FROM THE 2025 OPERATING LICENSE RENEWAL APPLICATION FOR RANGE ROAD LANDFILL.

0 1000 2000
SCALE IN FEET

N

BELLE RIVER POWER PLANT
RANGE ROAD LANDFILL
LANDFILL WORK AREA PHASING PLAN

Geosyntec consultants
DETROIT, MICHIGAN

FIGURE 1

PROJECT: CHE1067 | JANUARY 2026

APPENDIX A

Resume of Clinton Carlson, Ph.D., P.E.
(Qualified Professional Engineer)

Clinton P. Carlson, PhD, PE

Qualifications

Dr. Carlson is a geotechnical engineer with eleven years of experience on projects related to design and remediation of landfills and coal combustion residual (CCR) impoundments, dam safety, and geotechnical instrumentation. He is a Senior Engineer with Geosyntec and part of the firm's dams and levees practice area. His work has included managerial responsibilities for project budgets and schedules and has primarily supported federal and power clients for both small and large projects. Clinton has managed and supported projects for risk assessments, slope stability analyses, and instrumentation for landfills and dams.

Specialties

Landfill and CCR Design and Remediation
Dam Safety
Geotechnical Instrumentation

Education

PhD, Civil Engineering, University of Michigan, Ann Arbor, MI, 2014
MSE, Civil Engineering, University of Michigan, Ann Arbor, MI, 2010
BSE, Civil & Environmental Engineering, University of Michigan, Ann Arbor, MI, 2009

Licenses/Certifications

Professional Engineer: IN, MI

Relevant Project Experience

Annual Inspections of CCR Units, Confidential Client, Midwest US | Inspections of CCR units are conducted annually as part of the United States Environmental Protection Agency (USEPA) CCR Rule to identify any site conditions that pose a concern to the safe operation and stability of the CCR units. Project manager in charge of financials and engineer in charge of performing annual inspections for three CCR units for a client in the Midwest United States. As the qualified professional engineer, prepared inspection reports to summarize observed conditions at the three CCR units. Interacted with client representatives to discuss necessary actions to address potential concerns. (Mar. 2022–Present)

Monitoring and Maintenance for CCR Units, Confidential Client, Midwest US | Project manager in charge of financials and engineer in charge of overseeing inspections, monitoring, and maintenance of geotechnical instrumentation system of two CCR units for a client in the Midwest United States. The geotechnical instrumentation system included multiple monitoring wells, settlement plates, vibrating wire piezometers, manual inclinometers, and ShapeArray inclinometers. Instrumentation data were evaluated to identify near real-time concerns for the safe operation and stability of the CCR units. Provided monthly summary reports to the client representatives and met with them to discuss the monitoring data on a bi-monthly basis. Conducted site inspections of observed conditions posing concerns for the safe operation and stability of the CCR units on at the request of the client. (Mar. 2022–Present)

Initial Safety Factor Assessment for CCR Units, Confidential Client, Southeast US | The USEPA CCR Rule requires periodic safety factor assessments are performed to assess the stability of perimeter embankments for existing CCR surface impoundments. A confidential client in the Southeast United States has a site with four CCR units impounded by earthen embankment dams. Safety factor assessments in accordance with the CCR Rule had not been previously performed for these four earthen embankment dams. Led the geotechnical team performing the initial safety factor assessments for the four CCR units. Reviewed available information, developed models for slope stability analyses, calculated safety factors, and prepared reports to summarize the results. The analyses included development of pseudostatic coefficients to represent seismic loading conditions. (June 2025–Present)

FERC Part 12D External Audits of Owner's Dam Safety Programs, Multiple Clients, MI and OH | The FERC regulations require dam owners periodically have an external consultant audit the Owner's Dam Safety Program (ODSP), which includes dam safety documents like the Dam Safety Surveillance and Monitoring Plan (DSSMP) and Emergency Action Plan (EAP). The City of Ann Arbor and American Municipal Power, Inc. contracted Geosyntec to perform the audits of the ODSP for their portfolio of dams

(two and four, respectively) in 2024. Performed reviews of the dam safety documents, conducted interviews with dam safety personnel to evaluate their understanding of the dam safety program, observed site inspections conducted by personnel as part of the dam safety program, and prepared a report with the findings and conclusions on the content and implementation of the ODSP. Project manager in charge of the project financials and schedule and the point-of-contact with the owners. (Jan. 2024-Dec. 2024)

FERC Part 12D Periodic Inspections for Barton and Superior Dams, City of Ann Arbor, Ann Arbor, MI | The City of Ann Arbor owns and operates the Barton and Superior Hydroelectric Projects (Barton and Superior Dams) in Ann Arbor, Michigan. Barton and Superior Dams are used by the City of Ann Arbor for power generation and thus, are under regulation by the Federal Energy Regulatory Commission (FERC). FERC regulations require dam safety inspections are performed every five years by Independent Consultant (IC) Teams. Geosyntec served as the IC Team for the City of Ann Arbor for the Ninth FERC Part 12D Periodic Inspections of Barton and Superior Dams performed in 2023. Served as the project manager and point-of-contact with the City of Ann Arbor on behalf of the IC Team. Member of the IC Team (geotechnical engineering support and field inspection team) that performed the document review, developed the Inspection Plans, prepared the Pre-Inspection Preparation Reports, performed the field inspections, and prepared the Periodic Inspection Reports. The Periodic Inspection Reports were completed and submitted to FERC before the December 2023 deadline. (Jan. 2023–Dec. 2023)

Landfill Stability Evaluation, Confidential Client, Southeast US | Contacted by the client to evaluate an instability at an existing landfill including the implementation of instruments to measure and evaluate progression of instability. Project manager in charge of financials and engineer in charge of developing instrumentation plan and evaluating measurements of instrumentation. Conventional surveying stakes and an automated monitoring total station were implemented to measure progression of instability. Evaluation of measurements was used to inform the client on progression of instability and provide recommendations for implementation of mitigation measures. Weekly summary reports of instrumentation measurements were provided to the client while implementing mitigation measures. Additional support was provided to the client in discussions with the state regulator. The monitoring systems were also utilized to provide additional safety measures during the staged temporary removal of a buttress berm in order to tie-in liner systems for new landfill cells to the existing liner system. Monitoring data are currently summarized in monthly reports and provided to the client. (Aug. 2019–Present)

Landfill Design Projects for Power Company, Confidential Client, Southeast US | Engineer in charge of coordinating and performing the geotechnical analyses for the permitting and closure of multiple sites for a power company. Geotechnical analyses performed for the sites included subsurface investigation and geotechnical material properties interpretation, slope stability analyses (including veneer and liner stability), settlement calculations for liner and cover systems, and hydrologic evaluations for liner and cover systems. The computer programs Slide and HELP were used to perform the slope stability analyses and hydrologic evaluations, respectively. (June 2015–Present)

Portsmouth Gaseous Diffusion Plant On-Site Waste Disposal Facility, Fluor-BWXT Portsmouth, Piketon, OH | The Department of Energy's Portsmouth On-Site Waste Disposal Facility is being constructed for the disposal of on-site hazardous waste materials. Engineer that aided geotechnical analyses for the design and construction of the facility. Geotechnical analyses performed during the design phase included slope stability analyses (including veneer and liner stability), settlement calculations for liner and cover systems under variable loads, and foundation design for leachate conveyance systems. During construction, performed slope stability analyses for excavation conditions and geo-structural calculations and reinforcement detailing for reinforced concrete valve houses constructed as part of a leachate transmission system and a footing for an interim transfer ramp. The computer program Slide was used to perform the slope stability analyses. (Apr. 2015–Present)

Inspections and Mitigation for CCR Landfill, Confidential Client, Midwest US | Probabilistic slope stability analyses for a CCR landfill in Southeast Michigan identified unsatisfactory conditions for existing slopes that required mitigation measures. Project manager in charge of project financials and schedule and engineer in charge of developing inspection and construction plans to mitigate unsatisfactory conditions. Developed an inspection plan to identify indicators of slope instabilities and allow for safe

operation conditions. The inspection plan was carried out by site personnel prior to and during construction and supported by Geosyntec. Developed a construction plan to regrade the slopes and mitigate the unsatisfactory conditions. Performed site inspections and met with client representatives and contractors during construction to verify safe working conditions and satisfactory slope conditions were achieved. (Feb. 2022–May 2022).

Probabilistic Slope Stability Assessment for CCR Landfill, Confidential Client, Midwest US | Previous site inspections identified potentially unstable slopes at a CCR landfill in the Midwest United States, so probabilistic slope stability analyses were performed to evaluate the reliability of the slope conditions given limited site information. Engineer that aided in review of probabilistic slope stability analyses and slope stability assessment report. Recommendations were developed and provided to the client to address unsatisfactory conditions for existing slopes identified in the probabilistic site response analyses. (Nov. 2021–May 2022).

Quantitative Risk Assessment for Dam in Southeast US, Confidential Client, Southeast US | The project further refines estimates of risk developed from previous potential failure mode analyses and semi-quantitative risk analyses performed for an embankment dam and its primary and auxiliary spillways located in the Southeastern U.S. Project manager in charge of financials and schedule for the Quantitative Risk Assessment (QRA) of the dam. The main objectives of the QRA are to estimate the risk, in terms of annual failure probabilities and downstream consequences, for seismic, internal erosion, and spillway hydrologic failure modes and the uncertainties associated with the risks. Actively participated in the expert elicitation process to develop risk models and meetings with the client to present the models and results of the QRA. Prepared calculation packages and reports summarizing the methods used in the QRA and the results for the client. Aided in the ground motion selection, internal erosion evaluation, and evaluation of the erodibility of the embankment soils. (May 2018–Apr. 2022)

Field Investigation of Primary Spillway for Dam in Southeast US, Confidential Client, Southeast US | Field engineer for oversight of a visual inspection and investigation of the foundation of the primary spillway slabs and control structure for a dam in the Southeast U.S. Observations from the field investigation were used to inform a QRA performed for the dam and its spillways. The visual inspection was performed to identify vertical offsets and gaps in the joints between the slabs of the primary spillway. A field investigation consisting of shallow cores through the concrete slabs of the spillway and deep borings into competent rock below the control structure was performed to evaluate the foundation materials of the primary spillway and the presence of voids. (Jan. 2021–May 2021)

Landfill Stability Evaluation, Confidential Client, Southeast US | Contacted by the client to evaluate an instability at an existing landfill including the root cause of the instability. Project manager in charge of financials and engineer in charge of coordinating and performing slope stability analyses. Slope stability analyses were performed to evaluate the root cause of the instability and mitigation measures required to stabilize the landfill. Results of the analyses were used to support the client in discussions with the state regulator and advise the client on a path forward for stabilizing the landfill. A facility-wide stability plan was also developed based on the stability of the landfill for the existing conditions and the final planned conditions. Analyses were also performed for a staged temporary removal of a buttress berm in order to tie-in liner systems for new landfill cells to the existing liner system. Aiding in ongoing annual landfill stability assessments. (Aug. 2019–Dec. 2020)

Onondaga Lake Geotechnical Monitoring, Honeywell, Syracuse, NY | Contaminated sediments were dredged from Onondaga Lake and consolidated within geotextile tubes at an off-site landfill as part of a Superfund project. Geotechnical instrumentation systems were implemented to monitor (i) a sheetpile wall around a portion of the Lake dredged for remediation and (ii) a landfill closure comprised of geotextile tubes filled with sediments dredged from the Lake. Manager in charge of financials and engineer in charge of monitoring the instrumentation data. The monitoring systems included manual and automated inclinometers, settlement cells, vibrating wire piezometers, and surface monitoring points. (Feb. 2015–Oct. 2018)

APPENDIX B

2025 Annual Inspection Forms and Photos

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Inspector: Clinton Carlson, P.E., and Jorge Romana-Giraldo, Geosyntec
DTE: No DTE personnel accompanied the inspection
Date: 05 May 2025

Weather:
45-59F, mostly cloudy, light precipitation occurred the day before and the morning of the inspection.

Previous P.E. Annual Inspection Date: 29 April 2024

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
General Site					
1. Site Access Restricted / Attendant On-duty	☒	☐	☐	12, 36	Gates around perimeter were locked. Guard house across from main entrance to Landfill was staffed.
2. Security Fence / Gates	☒	☐	☒	12, 21, 28, 33, 36	The perimeter gates surrounding the Landfill were locked and in good condition (Photographs #12, #36). While the majority of the perimeter fence was in satisfactory or good condition, there are specific locations along the north (Photograph #21), northwest corner (Photograph #28), and west (Photograph #33) of the Landfill where the fence is damaged. The damage included bending of top rails and damage to the link mesh.
3. Signs and Markers	☒	☐	☐	12, 36	Security fences had signs noting DTE property and no trespassing (Photographs #12, #36). Markers for the perimeter slurry wall were observed and generally in good condition.
4. Access Roads and Construction Site Roads	☒	☐	☒	5, 15, 19, 22, 27, 34, 37, 39, 55, 61	The perimeter roads were generally in good condition (Photographs #15, #19, #22). Minor rutting and low spots were observed in a couple locations, specifically along the east side (Photograph #5), and the northwest corner (Photograph #27). In the northwest corner, west of the manhole lift station, puddles on the road were noted during the inspection (Photograph #34). On the west side of the property, the roads were not covered in aggregate and were soft due to recent rain, but they remained accessible (Photographs #34, #37). The access roads to the top deck in Areas B, F3, and D3/F3 (Photograph #39), as well as in Area G2

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
					Phase I (Photograph #55), were in good condition with no erosion observed. The haul road to the active filling in Area G2 Phase II had minimal rutting and no observed low spots (Photograph #61).
5. Traffic Flow and Waste Unloading	☒	☐	☐	51	Traffic within the active filling area (Area G2 Phase II) was operating safely and at speeds to limit fugitive dust. Waste placement was observed to be in line with generally accepted engineering practices.
6. AST Inspection	☐	☐	☐		Not inspected
7. Universal Waste (properly labelled, container condition, less than one year from accumulation start date)	☐	☐	☐		Not inspected
Waste and Nuisance Control					
8. Ash Hauling Contractor On-site Safety/Training	☐	☐	☐		Office and training records not reviewed.
9. Ash Hauling Contractor Equipment Condition/Adequacy	☒	☐	☐		Equipment was not closely inspected but appeared to be in good condition
10. Ash Hauling Contractor Filling Active Area to Appropriate Grade	☒	☐	☐	51, 53, 58, 59	Active filling operations were observed in Area G2 Phase II and appeared to be in line with generally accepted engineering practices (Photograph #51). The diversion berm between Area G2 Phase I and Phase II (Photograph #53) was preventing surface water from flowing onto the active Area G2 Phase II. The side slopes of the active Area G2 Phase II were in good condition with

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
					no observed erosion or indicators of slope stability (Photograph #59). The base of Area G2 Phase III was in good condition (Photograph #58), but no active filling was observed in this area during the inspection.
11. Waste Condition (i.e., waste from approved source, no recyclables, no MSW, no liquids, no hazardous wastes, etc.)	☒	☐	☐	51, 58, 59	DTE personnel noted waste sources. Waste being delivered appeared acceptable during the inspection.
12. Noise Level	☒	☐	☐		Covered in LDP. Excessive noise was not observed during the inspection (near active filling or around property line).
13. Dust Control	☒	☐	☐		Covered in Fugitive Dust Control Plan. DTE reported no citizen complaints regarding fugitive dust in 2025
14. Adequacy of Interim Cover and Interim Stockpile Cover	☒	☐	☐	59	The interim Landfill cover on the southern slopes of Area G2 Phase II were in good condition.
Final Cover					
15. Side Slopes (i.e.-no seeps, no cracking, no settling, no burrows, adequate vegetation)	☒	☐	☒	16, 20, 22, 25, 39, 40, 44, 45, 50, 56	The trees located on the side slopes in closed Areas A and B have been approved by the MDEQ to remain in place (Photographs #16, #20, #22, #25). During the inspection, no indicators of global slope instabilities around these trees were observed. The side slopes in Areas C (Photograph #40), D1 (Photograph #40), D2 and D3 (Photograph #39), F1 (Photographs #44, #45), G2 Phase I (Photograph #50), and F3 (Photograph #56) were in good condition (i.e., no erosion or indicators of slope instability; vegetation well maintained). A small seepage was observed on the north side slope of Area B (Photograph #20). The source was not identified during

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
					the visual inspection but may have been triggered by rainfall prior to the inspection.
16. Top Deck (i.e., no depressions, adequate vegetation)	☒	☐	☒	38, 39, 40, 41, 42, 52, 53	The top deck in Areas F3 and B (Photograph #38), D2 and D3 (Photograph #39), C and D1 (Photograph #40), and F1, F2, and G2 Phase I (Photograph #52) was in good condition. The vegetation was well maintained and no low spots with water ponding were visible. Water was observed behind the diversion berm separating Area G2 Phase I and the active Phase II (Photograph #53) and along the diversion berm to the stormwater downchute at the boundary between Areas D1 and B (Photograph #42) as a result of rainfall prior to the inspection. A small erosion gully was observed along the top deck where Areas B, B1, and C join (Photograph #41).
Leachate and Surface Water Control					
17. Stormwater Detention Pond Water Quality (unnatural films, foams, oils, etc.) and pump operating condition (panel, meter etc.)	☒	☐	☐	1, 2, 3, 4	No adverse conditions were noted within the SDB or in the water quality during the inspection (Photographs #1, #2, #3). The pump house was not inspected, but DTE personnel confirmed that the pumps are operational (Photograph #4).
18. Stormwater Detention Pond Side Slope Condition (erosion, riprap, vegetation)	☒	☐	☐	1, 2	The side slopes of the SDB appeared to be in good condition. Vegetation was well-maintained and no erosion was observed (Photographs #1, #2)
19. Internal Detention Ponds	☒	☐	☐	39, 56, 60	The internal detention ponds by Areas D3 and F3 (Photographs #39, #56) and south of Area G2 (Photograph #60) appeared to be in good condition. No erosion was observed on the perimeter side slopes of these ponds and vegetation appeared to be well maintained.

DTE Electric Company
Range Road Landfill
Annual Inspection Log

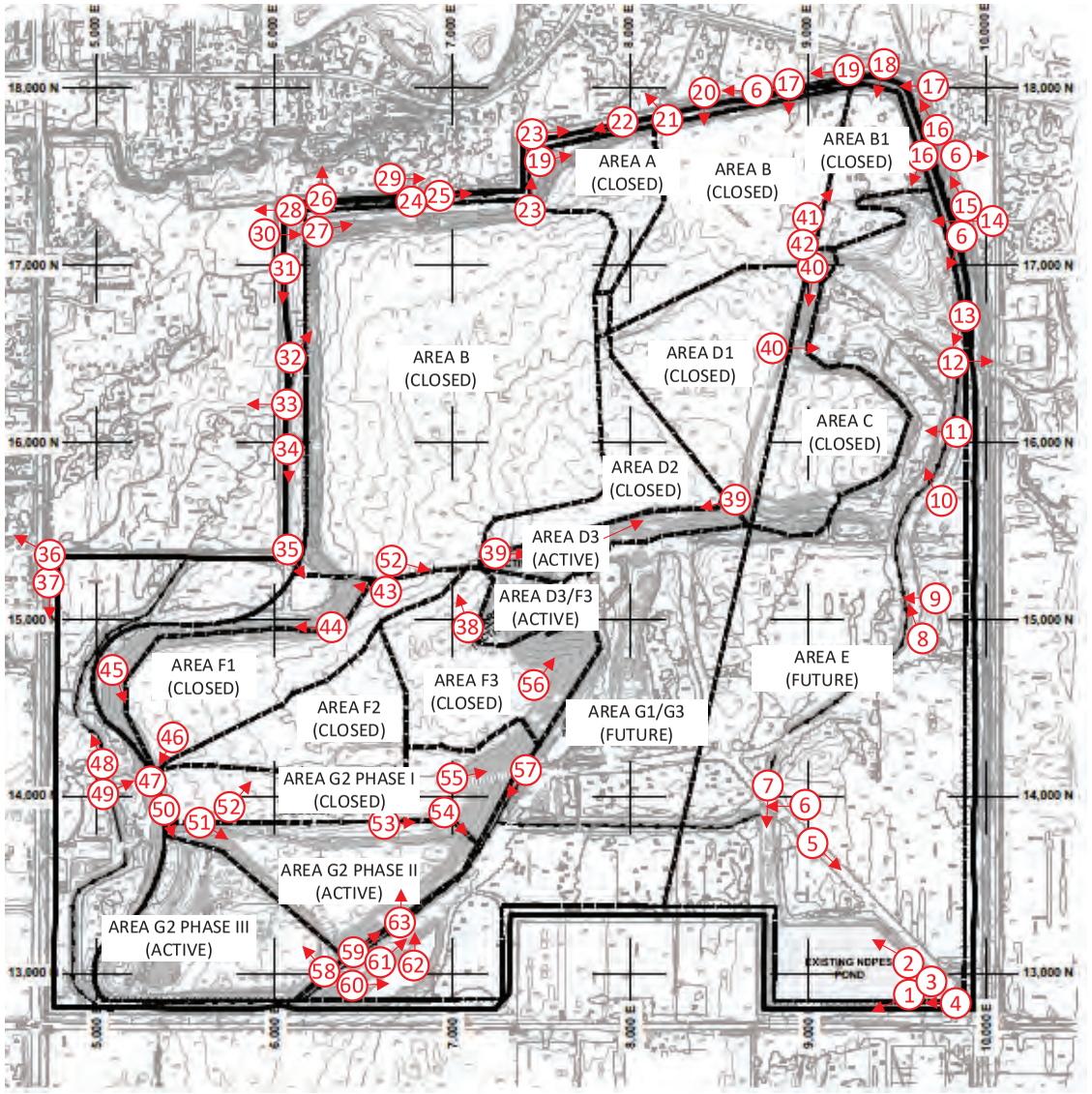
Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
20. NW Corner Lift Station Surface Water Ditch Level & Pump and Operating Condition	☒	☐	☐	24, 25, 26, 27, 29	The pump station, including the control panel, hoist, and concrete pad, along with the adjacent sections of the perimeter ditch (Photographs #25, #26, #29), were in good condition. The manholes at the pump station and upper perimeter ditch were not opened during the visual inspection. The corrugated pipe outlet into the upper perimeter ditch was in good condition, with water observed flowing freely during the inspection (Photograph #24). A wet spot and low areas with puddles in the perimeter road were observed to the west of the manhole (Photograph #27).
21. NE Off-site French Drain Operating Condition	☒	☐	☐	11	Control building was locked. Interior not inspected. The discharge pipe connected to the pump house was observed to be in good condition and flowing during the visual inspection (Photograph #11).
22. NW Off-site French Drain Operating Condition	☐	☐	☐		Offsite. Not inspected.
23. NE/NW Off-site French Drain Outfall Water Quality	☐	☐	☐		Not part of the annual inspection. Not inspected.
24. Perimeter Slurry Wall Marker Condition	☒	☐	☐		The perimeter slurry wall is below ground and could not be visually inspected. Several markers were observed and in good condition.
25. Monitoring Well/Piezometer Conditions	☒	☐	☐	6, 18	Monitoring wells and piezometers around the perimeter road were in good condition. Wells and piezometers near the road were generally protected by bollards (Photographs #6, #18), which were also in good condition.

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
26. Perimeter Ditch System (Flow & Staff Gauge Monitoring)	☒	☐	☒	9, 10, 13, 17, 18, 32	All staff gauges were located and most of them were in good or satisfactory condition (Photographs #9, #13, #17, #18, #32). However, staff gauge 06, located on the east side of the Landfill, was damaged and lying on the side slope of the perimeter ditch (Photograph #10). DTE repaired staff gauge 06 following the annual inspection. Staff gauge 10 was harder to observe because of vegetation within the perimeter ditch (Photograph #32). Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.
27. Perimeter Ditch System (Slope & Bottom Conditions); Includes Internal Ditch if a Main Discharge to Perimeter Ditch	☒	☐	☐	7, 8, 9, 10, 13, 14, 15, 16, 17, 18, 23, 30, 31, 32, 34, 35, 48, 57	The perimeter ditch system, including the side slopes, bottom, and culverts, was overall in good condition. The perimeter ditches on the north and east sides of the Landfill had recently been mowed and had minimal vegetation on both the side slopes and bottom (Photographs #7, #8, #9, #10, #15, #16, #17, #18). The culverts located on the east and north sides were also found to be in satisfactory condition (Photographs #13, #14, #23). On the west and south sides of the Landfill, the perimeter ditch had some vegetation, but the riprap armoring on the side slopes was in good condition, showing no signs of erosion (Photographs #31, #32, #34, #35, #48, #57). The inlet of a corrugated metal culvert on the northwest side of the landfill had some damage but was still able to convey flow through the perimeter ditch (Photograph #30).
28. Stormwater Downchutes	☒	☐	☒	42, 43, 46, 47, 49, 54, 55	The riprap-lined stormwater downchutes were generally in good condition. The downchute located between Areas B and D1 had some vegetation at the inlet but was observed to have stormwater flowing through it during the inspection (Photograph #42). The downchute at the northwest corner of Area F1 had some vegetation at the top; however, it did not appear to obstruct the flow of stormwater (Photograph #43). The downchutes in Area G2 Phase I were in satisfactory condition (Photographs #54, #55). The

DTE Electric Company
Range Road Landfill
Annual Inspection Log

Item	Condition			Related Photo # (s)	Notes and Comments (LDP=Landfill Development Plan, SDB = Stormwater Detention Basin)
	Good	Fair	Action Reqd.		
					stormwater downchute at the southwest corner of Area F1 had some vegetation along the top deck (Photograph #46) and noticeable erosion along the left side (facing downslope) which had caused the wire mesh to become distorted (Photograph #47). Finer particles likely from erosion had accumulated downslope of the riprap at the bottom of the downchute (Photograph #49).



DIRECTION OF PHOTO — PHOTO NUMBER

LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- DESIGNED LIMITS OF ASH FILL
- DISPOSAL AREA BOUNDARY
- SLURRY CUT OFF ALL DISPOSAL AREA (AREA E)

SITE PHASING LEGEND

AREA	STATUS	SIZE (ACRES)	MATERIAL UNDER WASTE	COMMENTS
A	CLOSED	7	CLAY	CERTIFIED CLOSED MAY 17, 2002
B	CLOSED	102	CLAY	CERTIFIED CLOSED PRIOR TO SEPTEMBER 2, 1999
B1	CLOSED	9	SAND	CERTIFIED CLOSED PRIOR TO SEPTEMBER 2, 1999
C	CLOSED	16	SAND	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
D1	CLOSED (INTERIM COVER ON SOUTHERN SIDESLOPES)	21	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
D2	CLOSED (INTERIM COVER ON SOUTHERN SIDESLOPES)	10	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, AUGUST 25, 2009
E	UNCONSTRUCTED WITH FINANCIAL ASSURANCE	117	SAND	CAN BE AUTHORIZED TO RECEIVE FILL ONCE A REMEDIATION PLAN IS IMPLEMENTED
F1	CLOSED	17	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, JANUARY 4, 2010
F2	CLOSED	12	CLAY	CERTIFICATION REPORT APPROVED BY MDEQ, FEBRUARY 28, 2018
F3	CLOSED	17	CLAY	CERTIFIED CLOSED MAY 22, 2018
D3	ACTIVE DISPOSAL	8	CLAY	INTERIM COVER AREA
F3/D3	ACTIVE DISPOSAL	3	CLAY	
G1/G3	UNCONSTRUCTED WITH FINANCIAL ASSURANCE	58	CLAY	
G2-PHASE I	CLOSED	16	CLAY	CERTIFICATION REPORT APPROVED BY EGLE, MAY 6, 2022
G2-PHASE II	ACTIVE DISPOSAL	19	CLAY	
G2-PHASE III	ACTIVE DISPOSAL	19	CLAY	

NOTE:
SITE MAP ADAPTED FROM FIGURE 1 BY TRC CONSULTANTS, LTD, MADISON, WISCONSIN, FROM THE 2025 OPERATING LICENSE RENEWAL APPLICATION FOR RANGE ROAD LANDFILL.

0 — 1000 — 2000
SCALE IN FEET

N

BELLE RIVER POWER PLANT
RANGE ROAD LANDFILL
PHOTO LOG

Geosyntec consultants
DETROIT, MICHIGAN

FIGURE
B1

PROJECT: CHE1067 | JANUARY 2026

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 1 **Date:** 5/5/2025 **Direction:** Southwest **Comments:** The south side slopes of the Stormwater Detention Basin (SDB) were in good condition. Some vegetation but no erosion was observed on the side slopes. The water quality within the SDB appeared to be appropriate for the NPDES permit.	
Photograph 2 **Date:** 5/5/2025 **Direction:** Northwest **Comments:** The north side slopes of the SDB were in good condition. Some vegetation but no erosion was observed on the side slopes. The water quality within the SDB appeared to be appropriate for the NPDES permit.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 3

Date: 5/5/2025

Direction: --

Comments: The trash rack for the outlet of the SDB was mostly clear of vegetation and in good condition.

Photograph 4

Date: 5/5/2025

Direction: Southwest

Comments: The pump house for the SDB was not accessed during the inspection. However, pumps were operational according to DTE personnel.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 5

Date: 5/5/2025

Direction: Southeast

Comments: The perimeter road on the southeast side of the Landfill was generally in good condition with minimal low spots and rutting.

Photograph 6

Date: 5/5/2025

Direction: Southwest

Comments: Monitoring wells and piezometers around the perimeter road were in good condition and generally protected by bollards (typical).

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 7

Date: 5/5/2025

Direction: Southeast

Comments: The perimeter ditch leading to the SDB had some vegetation on the side slopes but no erosion was observed. Flow toward the SDB was observed within the perimeter ditch during the visual inspection.

Photograph 8

Date: 5/5/2025

Direction: Northwest

Comments: The perimeter ditch on the east side of the Landfill had some vegetation on the western side slope but no erosion was observed. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 9

Date: 5/5/2025

Direction: West

Comments: The staff gauges located within the east perimeter ditch were generally in satisfactory condition (typical) (staff gauge-07 shown).

Photograph 10

Date: 5/5/2025

Direction: Northwest

Comments: Staff gauge-06, located on the east side of the Landfill, was damaged and lying on the side slope of the perimeter ditch. This staff gauge was repaired by DTE following the inspection.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 11 **Date:** 5/5/2025 **Direction:** West **Comments:** The discharge pipe connected to the pump house located on the east side of the Landfill for the perimeter slurry wall was observed to be in good condition and flowing during the visual inspection.	
Photograph 12 **Date:** 5/5/2025 **Direction:** East **Comments:** Perimeter fence gates were locked and generally in good condition (gate on east side shown). Signs for DTE property and “No Trespassing” were observed at the gates.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 13

Date: 5/5/2025

Direction: Southwest

Comments: The culvert located within the east perimeter ditch was in good condition. Although there was some vegetation present at the inlet, it did not impede the flow. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection. Staff gauge-05, also shown, was in good condition.

Photograph 14

Date: 5/5/2025

Direction: West

Comments: The concrete culvert located within the east perimeter ditch was in good condition. The outlet of this culvert was free of obstructions. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 15 **Date:** 5/5/2025 **Direction:** Northwest **Comments:** The perimeter road on the east side of the Landfill was in good condition with no rutting and minimal low spots.	
Photograph 16 **Date:** 5/5/2025 **Direction:** South **Comments:** Side slopes on the northeast side of the Landfill (Area B1) were covered in trees. MDEQ (EGLE) approved leaving the trees in place along these slopes. No indicators of slope instabilities were observed.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 17 **Date:** 5/5/2025 **Direction:** West **Comments:** The staff gauges located within the north perimeter ditch were generally in satisfactory condition (typical) (staff gauge-02 shown).	
Photograph 18 **Date:** 5/5/2025 **Direction:** Southwest **Comments:** The perimeter ditch on the north side of the Landfill was in good condition with no erosion observed on the side slopes. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection. Monitoring wells and piezometers and staff gauges were generally in satisfactory condition.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 19 **Date:** 5/5/2025 **Direction:** West **Comments:** The perimeter road on the north side of the Landfill was in good condition with no rutting and minimal low spots.	
Photograph 20 **Date:** 5/5/2025 **Direction:** South **Comments:** Some seepage was observed at the toe of the slopes on the north side of the Landfill.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 21

Date: 5/5/2025

Direction: Northwest

Comments: The perimeter fence was damaged at one location along the north perimeter road. The top rail was bent, and the link mesh was broken.

Photograph 22

Date: 5/5/2025

Direction: Southwest

Comments: Side slopes on the north side of the Landfill (Area A) were covered in trees. MDEQ (EGLE) approved leaving the trees in place along these slopes. No indicators of slope instability were observed along the north side of the Landfill.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 23

Date: 5/5/2025

Direction: South

Comments: The corrugated metal culverts within the north perimeter ditch were observed to be in good condition and not obstructed. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.

Photograph 24

Date: 5/5/2025

Direction: --

Comments: The discharge pipe from the lift station was free of obstructions and flowing into the upper perimeter ditch during the visual inspection.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 25 **Date:** 5/5/2025 **Direction:** East **Comments:** The upper perimeter ditch along the northwest side of the Landfill was in good condition with no observed erosion. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.	
Photograph 26 **Date:** 5/5/2025 **Direction:** North **Comments:** The control panel, hoist, concrete pad, and manhole of the lift station at the northwest corner of the site were in good condition. The manhole was not accessed during the inspection. However, pumps were operational according to DTE personnel.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 27

Date: 5/5/2025

Direction: East

Comments: Low spots and puddles were observed along the perimeter road at the northwest corner of the site between the upper and lower perimeter ditches.

Photograph 28

Date: 5/5/2025

Direction: West

Comments: The perimeter fence was damaged at one location along the northwest corner of the site. The top rail was bent.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 29 **Date:** 5/5/2025 **Direction:** East **Comments:** The lower perimeter ditch of the lift station at the northwest corner of the site was in good condition and had riprap armoring the side slopes. No erosion was observed within the riprap.	
Photograph 30 **Date:** 5/5/2025 **Direction:** East **Comments:** The corrugated metal culvert inlet to the lower perimeter ditch at the lift station was damaged. However, flow through the culvert did not appear to be obstructed.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 31 **Date:** 5/5/2025 **Direction:** South **Comments:** The perimeter ditch on the northwest side of the Landfill was in good condition and had riprap armoring the side slopes. No erosion was observed in the riprap. Flow within the perimeter ditch was observed to be in the proper direction during the visual inspection.	
Photograph 32 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The staff gauges located within the northwest perimeter ditch were observed and generally in satisfactory condition (typical) (staff gauge-10 shown). The perimeter ditch on the northwest side of the Landfill had some vegetation on the side slopes but no erosion was observed.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 33

Date: 5/5/2025

Direction: West

Comments: The perimeter fence was damaged at one location along the west side of the site. The top rail was bent from a tree branch falling on the fence.

Photograph 34

Date: 5/5/2025

Direction: South

Comments: The perimeter roads, ditch and fence on the northwest side of the Landfill were generally in good condition. The perimeter ditch had riprap armoring the side slopes. Minor vegetation and no erosion were observed along the side slopes of the perimeter ditch.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 35

Date: 5/5/2025

Direction: Southeast

Comments: The corrugated metal culvert located on the northwest side of the landfill, directing stormwater runoff from Areas B and F1 to the perimeter ditch was in satisfactory condition.

Photograph 36

Date: 5/5/2025

Direction: Northwest

Comments: Perimeter fence gates were locked and generally in good condition (gate on east side shown). Signs for DTE property and “No Trespassing” were observed at the gates.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 37 **Date:** 5/5/2025 **Direction:** South **Comments:** The perimeter roads and fence on the west side of the Landfill were in good condition. The roads were not covered in aggregate but were still accessible, though not traveled during the inspection.	
Photograph 38 **Date:** 5/5/2025 **Direction:** Northwest **Comments:** The top deck of Areas F3 and B was in good condition. The vegetation was well maintained. No low spots with water ponding were visible.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 39 **Date:** 5/5/2025 **Direction:** East **Comments:** The side slopes of Areas D2 and D3 and top deck of Area D2 were in good condition. Vegetation was well maintained. No erosion or indicators of slope instability were observed on the slopes. No low spots with water ponding were visible.	
Photograph 40 **Date:** 5/5/2025 **Direction:** South **Comments:** The top deck and side slopes of Areas C and D1 were in good condition. The vegetation was well maintained. No low spots with water ponding were visible. No erosion or indicators of slope instability were observed on the slopes.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 41

Date: 5/5/2025

Direction: Northeast

Comments: A small erosion gully was observed along the top deck where Areas B, B1, and C join.

Photograph 42

Date: 5/5/2025

Direction: --

Comments: Stormwater runoff was observed flowing toward and into the downchute at the boundary between Areas B and D1. Some vegetation was observed at the inlet of the downchute but did not appear to obstruct the flow.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 43 **Date:** 5/5/2025 **Direction:** Southwest **Comments:** The downchute at the boundary between Areas B and F1 was generally in good condition. Some vegetation was observed in the inlet and the riprap near the downchute.	
Photograph 44 **Date:** 5/5/2025 **Direction:** West **Comments:** The side slopes outside Area F1 were in good condition with no erosion or indicators of slope instability observed. Vegetation was well maintained.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 45 **Date:** 5/5/2025 **Direction:** Southeast **Comments:** The side slopes of Area F1 were in good condition with no erosion or indicators of slope instability observed. Vegetation was well maintained.	
Photograph 46 **Date:** 5/5/2025 **Direction:** Southwest **Comments:** The top of the riprap-lined stormwater downchute at the southwest corner of Area F1 was in satisfactory condition. Some vegetation was observed at the top of the downchute but no erosion was observed in the riprap.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 47

Date: 5/5/2025

Direction: --

Comments: The riprap on the left side of the stormwater downchute (facing downslope) at the southwest corner of Area F1 had eroded and the wire mesh has been distorted.

Photograph 48

Date: 5/5/2025

Direction: Northwest

Comments: The perimeter ditch along the west side of the Landfill was in satisfactory condition. There was some vegetation but no erosion was observed in the riprap on the side slopes of the ditch and no obstructions were observed in the culverts.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 49

Date: 5/5/2025

Direction: East

Comments: Finer soil particles were observed at the bottom of the stormwater downchute at the southwest corner of Area F1. The particles appear to originate from erosion along the left side of the stormwater downchute (facing downslope).

Photograph 50

Date: 5/5/2025

Direction: Southeast

Comments: The side slopes of Area G2 Phase I were in good condition. No erosion or indicators of slope instability were observed on the slopes. Vegetation was well maintained.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 51 **Date:** 5/5/2025 **Direction:** Southeast **Comments:** Active filling was observed in Area G2 Phase II during the visual inspection. The traffic, material unloading, and material placement appeared to be in line with generally accepted engineering practices. The equipment was operating safely and at speeds to limit fugitive dust.	
Photograph 52 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The top decks of Areas F1, F2, and G2 Phase I were in good condition. The vegetation was well maintained. No low spots with water ponding were visible.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 53 **Date:** 5/5/2025 **Direction:** East **Comments:** The side slopes of Area G2 Phase I above Area G2 Phase II were in good condition. No erosion or indicators of slope instability were observed. The vegetation was well maintained. Water was observed behind the diversion berm separating Area G2 Phase I and Phase II preventing surface water from flowing onto the active Area G2 Phase II.	
Photograph 54 **Date:** 5/5/2025 **Direction:** Southeast **Comments:** The riprap-lined stormwater downchute at the southeast corner of Area G2 Phase I was in good condition. Some vegetation was observed but no erosion was observed in the riprap.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 55 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The access road to Area G2 Phase I was in good condition. The stormwater channel along the access road was in good condition.	
Photograph 56 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The internal detention pond by Area D3/F3 was in good condition. There is some vegetation around the perimeter of the pond, but no erosion was observed on the side slopes. The side slopes of Area F3 were in good condition. Vegetation was well maintained. No erosion or indicators of slope instability were observed.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 57

Date: 5/5/2025

Direction: Southwest

Comments: The perimeter ditch on the south side of the Landfill had some vegetation on the bottom of the ditch, but no erosion was observed on the side slopes. No flow was observed within the south perimeter ditch during the visual inspection.

Photograph 58

Date: 5/5/2025

Direction: Northwest

Comments: Area G2 Phase III was in good condition. No active filling was observed in this area during the visual inspection, though this area has begun active filling.

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 59 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The side slopes of the active Area G2 Phase II were in good condition. No erosion or indicators of slope instability were observed on the side slopes.	
Photograph 60 **Date:** 5/5/2025 **Direction:** East **Comments:** The internal detention pond south of Area G2 was in good condition. No erosion was observed on the side slopes.	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company | **Project Number:** CHE1067A

Site Name: Range Road Landfill | **Site Location:** China Township, MI

Photograph 61 **Date:** 5/5/2025 **Direction:** Northeast **Comments:** The haul road to the active filling area in Area G2 Phase II on the south side of the Landfill was generally in good condition with minimal low spots and rutting. No fugitive dust was observed during the visual inspection.	
Photograph 62 **Date:** 06/11/2025 **Direction:** North **Comments:** Erosion observed on the southern slope of G2 Phase II in June 2025. (Photograph taken from the EGLE 3rd Quarter Part 115 Inspection).	

DTE ELECTRIC COMPANY
Photographic Record

Client: DTE Electric Company **Project Number:** CHE1067A

Site Name: Range Road Landfill **Site Location:** China Township, MI

Photograph 63	
Date: 9/19/2025	
Direction: North	
Comments: Repaired silt fence with strawbales on the southern slope of the active G2 Phase II. The area of erosion was also regraded and a diversion berm was constructed at the crest of this slope. (Photograph taken from DTE response to the EGLE 4th Quarter Part 115 Inspection)	

Photograph	
Date:	
Direction:	
Comments:	