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October 11, 2016

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

Subject: Monroe Power Plant Coal Combustion Residual (CCR) Surface Impoundment
Liner Design Evaluation—Fly Ash Basin

Dear Mr. Garavaglia:

DTE Electric Company manages coal combustion residuals generated at the Monroe Power Plant (MONPP) in a fly ash basin [surface impoundment according to the Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (federal CCR rule)]. TRC has reviewed available information for the fly ash basin to evaluate whether the existing surface impoundment liner system meets the requirements for existing lined surface impoundments as required in Title 40 Code of Federal Regulations (CFR) 257.71.

The existing MONPP surface impoundment fly ash basin was constructed by forming a compacted clay berm to serve as the perimeter of the basin. The bottom of the fly ash basin is comprised of native clay soil. Even though laboratory permeability tests performed on samples collected from this native clay indicate that the hydraulic conductivity of underlying clay soils is less than 10^{-7} cm/sec, this basin was not constructed in accordance with the requirements of 40 CFR 257.71. Therefore, this ash basin is considered an unlined existing surface impoundment and is subject to the requirements of 40 CFR 257.101(a).

Sincerely,

TRC Environmental Corporation

David B. McKenzie, P.E.
Senior Engineer



Graham Croxford
Senior Consultant