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

Subject: River Rouge Power Plant Coal Combustion Residual (CCR) Surface Impoundment
Liner Design Evaluation—Bottom Ash Basins

Dear Mr. Garavaglia:

DTE Electric Company manages coal combustion residuals generated at the River Rouge Power Plant (RRPP) in two bottom ash sedimentation basins [considered surface impoundments 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 construction of the bottom ash basins to evaluate whether the existing surface impoundment liner system meets the requirements for an existing lined surface impoundment as required in Title 40 Code of Federal Regulations (CFR) 257.71.

The existing RRPP surface impoundment bottom ash basins were constructed by incising into native soil. Sheet pile was used to form the basin walls, and the basin bottoms consist of native silt. As these basins were not constructed in accordance with the requirements of 40 CFR 257.71, these bottom ash basins are considered unlined existing surface impoundments and are subject to the requirements of 40 CFR 257.101(a).

Sincerely,

TRC Environmental Corporation

David B. McKenzie, P.E.
Senior Engineer



Graham Crockford
Senior Consultant