



December 23, 2024

Ms. Melinda Steffler, District Supervisor  
Water Resource Division  
Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Southeast Michigan District Office  
27700 Donald Court  
Warren, MI 48092

Re: Bottom Ash Transport Water (BATW)– 2025 Annual Progress Report (Cessation of Coal Burning Activities)  
DECO – Belle River Plt  
NPDES Permit No. MI0038172

Dear Ms. Steffler,

This submittal provides the annual progress report in accordance with 40 CFR 423.19(f)(3) and Permit Section I.A.12.f.1. The attached documentation includes updates as required by 40 CFR 423.19(f)(4).

On October 13, 2020, the U.S. Environmental Protection Agency (EPA) issued the Effluent Limit Guidelines (ELG) Reconsideration Rule (2020 Rule), revising portions of the 2015 ELG Rule. The 2020 Rule addressed requirements for Bottom Ash Transport Water (BATW) and Flue Gas Desulfurization Wastewater (FGD WW) and introduced a compliance subcategory for electric generating units planning to cease coal use through retirement or fuel conversion. Under this provision, qualifying units may operate until December 31, 2028, provided they meet specific conditions, including implementation of existing treatment technologies, submission of a Notice of Planned Participation (NOPP), and annual reporting. DTE Electric Company (DTE) submitted the Cessation of Coal NOPP for Belle River Power Plant (BLRPP) in October 2021, consistent with 40 CFR 423.19(f)(1), as its selected ELG compliance option.

In May 2024, EPA released the ELG Supplemental Rule, establishing technical requirements and discharge standards for BATW, FGD WW, Combustion Residual Leachate (CRL), and Legacy Wastewater (LWW). Subsequently, in September 2025, EPA proposed the ELG Deadline Extensions Rule to postpone compliance deadlines for coal-fired power plants; the final rule is pending. Despite these developments, DTE's compliance strategy for BLRPP remains unchanged.

If you have any questions regarding this submittal, please contact Marcela Orlandea at (248) 207-7768 or via email at [marcela.orlandea@dteenergy.com](mailto:marcela.orlandea@dteenergy.com).

Sincerely,

Mark Chesney  
Plant Manager  
Belle River Power Plant  
Energy Supply - DTE Electric Company  
586-484-5197

Enclosure

Cc: Sabrina Good - EGLE, Southeast Michigan District Office  
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Marcela Orlandea - DTE EM&S

## Enclosure 1

### Bottom Ash Transport Water – 2025 Annual Progress Report

#### **Unit Identification**

Belle River Power Plant (BLRPP) is located at 4505 King Road, China Twp., Michigan. BLRPP consists of two B&W subcritical wall-fired boilers firing low sulphur subbituminous coal rated for a maximum gross output of 1,260 MW. The units started commercial operation in 1984 and 1985. This cessation of coal NOPP will apply to both Unit 1 and Unit 2 at BLRPP.

#### **Method for Cessation of Coal Burning Activities**

The 2020 Rule details that the cessation of coal could occur by either unit retirement or repowering to another fuel source. The option to repower to another fuel source is the option DTE has selected.

#### **Expected Date of Coal Cessation**

DTE's current Integrated Resource Plan (IRP), approved on July 26, 2023, provides a detailed analysis of DTE's long term generation plan and proposes to convert BLRPP from a baseload coal plant to a natural gas peaking resource. The IRP proposes to convert Unit 1 in 2025 and Unit 2 in 2026, pending approval of the future regulatory filing, including but not limited to electric general rate cases.

#### **Regulatory Approval of Coal Cessation**

The NOPP submitted in October 2021 represents the first formal submittal to a regulatory body regarding DTE's intentions to meet the 2020 Rule's cessation of coal compliance subcategory. In the preamble of the 2020 Rule, EPA acknowledges that a company may submit a cessation of coal NOPP and may not receive regulatory approval of those actions until a later date.

The IRP approved by the Michigan Public Service Commission (MPSC) on July 26, 2023 qualifies as the regulatory approval identified by the 2020 Rule for the cessation of coal compliance subcategory.

#### **Supporting Documentation of Coal Cessation Commitment**

This 2025 Annual Progress Report documents DTE's commitment regarding its intentions to utilize the 2020 Rule's cessation of coal compliance subcategory. The finalized IRP settlement can be found on the Michigan Public Service Commission (MPSC) website under [Filing: U-21193-0527 \(site.com\)](#). Any future regulatory filings, if they become available, may provide additional documentation in support to achieve compliance with ELG requirements.

#### **Timeline for Achieving Coal Cessation**

Belle River Unit 1 has ceased operation of coal burning activities and initiated commissioning of the gas-fired system in December 2025. Unit 2 is scheduled to ceased coal burning activities by the end of 2026. The table below presents an itemized timeline for achieving cessation of coal at BLRPP.

<b>Cessation of Coal Burning Project Schedule</b>			
<i>Key Activity or Milestone</i>	<i>Start Date</i>	<i>Completion Date</i>	<i>Progress</i>
<b>Issue for EPC Bid</b>	01/2023	06/2023	100%
<b>Review &amp; Award Bid – Limited Notice to Proceed</b>	06/2023	12/2023	100%
<b>Major Equipment Delivery</b> (Remaining item: Unit 2 Reheater Assemblies)	-	08/2026	90% - On Track
<b>Pre-Outage Construction</b> (Unit 1 & Fuel Yard Complete, Unit 2 has started)	04/2025	04/2026	60% - On Track
<b>Unit 1 Tie-In, Testing &amp; Commissioning</b> (Installation Complete, Burners Commissioned, Load Check Testing & Tuning in Progress)	09/2025	01/2026	85% - On Track
<b>Unit 2 Tie-In Testing &amp; Commissioning</b>	09/2026	01/2027	0% - On Track

\*Dates current as December 2025

### **Risks for Potential Milestone Delays**

The information presented in this annual report represents the best information available to meet the requirements of the initial NOPP submittal and of NPDES Permit MI0038172 I.A.12.f.1. DTE has identified the following factors that could result in modifications of information submitted in this report:

1. Regulatory Changes / Rule Modifications – On August 3, 2021, EPA initiated a new rulemaking to revise the 2020 Rule for certain wastewater discharge limits. In May 2024, the EPA released the 2024 ELG “Supplemental” Rule that established additional technical requirements and discharge standards for wastewaters such as combustion residual leachate (CRL), and legacy wastewater (LWW). The 2025 Draft ELG Deadline Extension Rule only applies to the coal-fired plants, so if/when finalized it is not anticipated to affect DTE’s compliance path. However, other potential future regulatory changes could impact DTE’s ELG compliance strategy including the use of the cessation of coal compliance subcategory and associated NOPP process.
2. Other Factors to Be Determined – Other factors including, but not limited to, long lead material construction and delivery delays, outage schedule changes, as well as legal challenges to EPA’s ELG rules or rulemakings conducted by current and/or future administrations.

The factors detailed above could result in changes to DTE’s ELG compliance strategy and may result in modification of the initial NOPP. DTE will submit appropriate documentation pursuant to 40 CFR 423.19(f)(3), if changes to the NOPP are needed or transition to other compliance options pursuant to 40 CFR 423.13(o).