



December 27, 2024

Ms. Tiffany Myers, District Supervisor  
Water Resources Division  
Michigan Department of Environment, Great Lakes and Energy (EGLE)  
Jackson District Office  
301 E. Louis B. Glick Highway  
4th Floor  
Jackson, Michigan 49201

Re: Bottom Ash Transport Water (BATW) and Cessation of Coal Combustion (COCC) NOPP  
– 2024 ELG Annual Progress Report  
DTE – Monroe Plt  
NPDES Permit No. MI0001848

Dear Ms. Myers,

This submittal is the follow-up annual progress report per 40 CFR 423.19(f)(3) and per NPDES Permit Section I.A.15.b.

On October 13, 2020, the Environmental Protection Agency (EPA) released the final version of the Effluent Limit Guidelines (ELG) Reconsideration Rule (2020 Rule) which updated the **2015 ELG Rule (2015 Rule)**. **This Final Rule is the product of the EPA’s “Reconsideration” of** certain portions of the 2015 Rule, specifically addressing Bottom Ash Transport Water (BATW) and Flue Gas Desulfurization Wastewater (FGD WW).

The 2020 Rule allowed for electric generating units(s) to discharge BATW until a date determined by the permitting authority, but no later than December 31, 2025. The Final Rule also established a compliance subcategory for electric generating unit(s) that will cease the use of coal either by retirement or by fuel conversion. In 2023, a Direct Final Rule was published in the federal register that extended the time that facilities had to submit a Notice of Planned Participation (NOPP) if they intended to cease the use of coal by December 31, 2028.

The Direct Final Rule allows facilities that plan to cease coal operation by December 31, 2028 to submit a NOPP until June 27, 2023 if the facilities fulfill certain requirements regarding the proper submittal of a NOPP and subsequent annual reports. DTE Electric Company (DTE) submitted the Cessation of Coal NOPP for Monroe Power Plant (MONPP) Units 3 and 4 on April 28, 2023 in accordance with 40 CFR 423.19(f)(1).

**In May 2024, the EPA released the 2024 ELG “Supplemental” Rule that established additional** technical requirements and discharge standards for wastewaters such as BATW, FGD WW, residual leachate (CRL), and legacy wastewater (LWW). The 2024 ELG Supplemental Rule, however, does not change the compliance strategy selected by DTE for MONPP.

DTE will be utilizing the best available technology for BATW compliance on Monroe Power Plant Units 1 and 2, and early cessation of coal utilization for Units 3 and 4.

Enclosure 1 provides the information necessary to submit a status update describing the path that DTE is currently following to comply with the BATW discharge as described in 40 CFR 423.13(k)(1)(i) for Units 1 and 2 at MONPP. Enclosure 2 provides the information necessary to comply with 40 CFR 423.19(f)(3) & (4) for Units 3 and 4 at MONPP.

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

Sincerely,



Daniel Casey  
Plant Manager, Monroe Power Plant  
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Enclosures

Cc: Alexandria Seeger - EGLE, Jackson District Office  
Jason Logan - DTE EM&S, Monroe Power Plant  
Eric Molnar - DTE EM&S, Monroe Power Plant  
Christopher Paquette - DTE EM&S  
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Marcela Orlandea - DTE EM&S

## Enclosure 1

### Bottom Ash Transport Water - 2024 Annual Progress Report

#### Unit Identification

Monroe Power Plant (MONPP) is located at 3500 East Front Street, Monroe, Michigan. MONPP consists of four B&W supercritical wall-fired boilers firing a blend of subbituminous coal, bituminous coal and petroleum coke rated for a maximum gross output of 3,280 MW. The units started commercial operation from 1971 to 1974. The annual progress report to cease new generation of bottom ash transport water applies to Units 1 and 2 at MONPP.

#### Compliance Method for BATW ELG Compliance

DTE selected to comply with 40 CFR 423.13(k)(1)(i) by stopping discharging all BATW that was not part of the Flue Gas Desulfurization process.

#### Design/ Engineering/ Construction Progress

In October of 2021, DTE began the conceptual design for Submerged Grind Conveyors. In March of 2022 the technical specification and configuration was finalized. DTE will be installing Submerged Grind Conveyors on Unit 1 and Unit 2 at Monroe Power Plant. The system is being designed to convey bottom ash from the bottom ash hopper of a coal fired boiler through a conveyor for dewatering. The conveyor will then transition into one of two systems that will discharge the dewatered ash into the bunkers where it will ultimately be shipped for beneficial use elsewhere or sent for disposal at a regulated facility. The water will then be captured in the quench water system.

DTE finalized the design in preparation for the General Contractor installation bid in December 2023. The General Contractor bid was awarded in the 1<sup>st</sup> quarter of 2024. Pre-outage construction for the common conveyor, common bunker and Unit 2 equipment began in mid-April. Long Lead Material began arriving as scheduled in 2<sup>nd</sup> quarter of 2024 with the remainder being received late in the 3<sup>rd</sup> quarter of 2024. Unit 2 Tie-in outage work began in November 2024 and is on track to be completed in early January 2025. After final commissioning and review of lessons learned from Unit 2 construction, Unit 1 pre-outage construction is expected begin in late-February 2025.

<b>Bottom Ash Conversion Project Schedule</b>			
<i>Key Activity or Milestone</i>	<i>Start Date</i>	<i>Completion Date</i>	<i>Progress</i>
<b>Technical Design &amp; Configuration</b>	10/2021	4/3/2022	100%
<b>Final Design</b>	10/2021	12/15/2023	100%
<b>General Contractor Bid</b>	12/18/2023	2/9/2024	100%
<b>Common/U2 Pre-Outage Construction</b>	4/19/2024	10/29/2024	100%
<b>Unit 1 Pre-Outage Construction</b>	2/24/2025	9/16/2025	0% - On Track
<b>Unit 1 Tie-In Outage</b>	9/20/2025*	11/29/2025*	0% - On Track
<b>Unit 2 Tie-In Outage</b>	11/1/2024	11/23/2024*	80% - On Track

\* Dates are tentative based on current final design. Dates may be adjusted slightly to adjust to market demand.

## Risks/ Milestone Delays

The information presented in this annual progress report represents the best information available to meet the requirements of NPDES Permit MI0001848 I.A.15.b. DTE has identified the following factors that could result in modifications of information submitted in this NOPP:

1. Electric Rate Cases – The IRP provides the model by which DTE will provide affordable and reliable electricity to its customers. However, many of the projects that will be required to achieve compliance with the 2020 Rule will need to be approved within future DTE electric rate cases. The outcome of future rate cases regarding future projects may result in modifications to **DTE’s compliance plan for BATW**.
2. Regulatory Changes / Rule Modifications – On July 26, 2021, the EPA announced that it will initiate a new rulemaking to revise the 2020 ELG 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 BATW, FGD WW, residual leachate (CRL), and legacy wastewater (LWW). The 2024 ELG Supplemental Rule, however, did not change the compliance strategy selected by DTE for MONPP.
3. Other Factors to Be Determined – Other factors include long lead material construction and delivery delays, outage schedule changes as well as legal challenges of **EPA’s ELG** rules or rulemakings conducted by future federal administrations.

The factors detailed above **could result in changes to DTE’s ELG compliance strategy and** may result in modification of the compliance plan as described in this annual progress report. DTE has submitted a Notice of Planned Participation to cease the use of coal for Units 3 and 4 at Monroe Power Plant and will continue to discharge BATW for those units until December 31, 2028. Please see Enclosure 2 for additional details.

## Enclosure 2

### Cessation of Coal – 2024 Annual Progress Report Content Requirements

#### Unit Identification

Monroe Power Plant (MONPP) is located at 3500 East Front Street, Monroe, Michigan. MONPP consists of four B&W supercritical wall-fired boilers firing a blend of subbituminous coal, bituminous coal and petroleum coke rated for a maximum gross output of 3,280 MW. The units started commercial operation from 1971 to 1974. This section of the annual progress report to cease coal burning generation activities by December 31, 2028 applies to Units 3 and 4 at MONPP.

#### Expected Date of Coal Cessation

Since the release of the 2023 Direct Final Rule, DTE has evaluated the feasibility of coal cessation on Units 3 and 4 at MONPP. DTE submits this 2024 Annual Progress Report maintaining the commitment to cease burning coal at MONPP Units 3 and 4 by December 31, 2028.

#### Method for Cessation of Coal Burning Activities

**DTE's current Integrated Resource Plan (IRP) was approved on July 26, 2023 and included a planned retirement date for MONPP Units 3 and 4 by December 31, 2028.** The 2020 Rule details that the cessation of coal could occur by either unit retirement or repowering to another fuel source. The option to retire generation units is the option DTE has considered for two of the four MONPP units.

#### Regulatory Approval of Coal Cessation

The NOPP submitted in April 2023 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 2024 **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 and when they become available, may be provided as additional documentation in support to achieve compliance with ELG requirements.

### Timeline for Achieving Coal Cessation

Monroe Unit 3 and Monroe Unit 4 are expected to cease operation of coal burning activities by December 31, 2028.

### Risks/ Milestone Delays

The information presented in this annual progress report represents the best information available to meet the requirements of NPDES Permit MI0001848 I.A.15.b. DTE has identified the following factors that could result in modifications of information submitted in this report:

1. Regulatory Changes / Rule Modifications – On July 26, 2021, the EPA announced that it will initiate a new rulemaking to revise the 2020 ELG Rule for certain wastewater discharge limits. **As mentioned above, the 2024 ELG “Supplemental” Rule, issued by the EPA in May 2024, has not changed the compliance strategy selected by DTE for MONPP.**
2. Other Factors to Be Determined – Other factors include long lead material construction and delivery **delays, outage schedule changes as well as legal challenges of EPA’s ELG rules or rulemakings** conducted by future federal administrations.