



December 29, 2025

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  
– 2025 ELG Annual Progress Report  
DTE – Monroe Plt  
NPDES Permit No. MI0001848

Dear Ms. Myers,

This submittal is the annual progress report in accordance with 40 CFR 423.19(f)(3) and per NPDES Permit Section I.A.15.c.

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).

Under the 2020 Rule, electric generating units were permitted to discharge BATW until a date set by the permitting authority, but no later than December 31, 2025. The Rule also introduced a compliance subcategory for units planning to cease coal use through retirement or fuel conversion.

In 2023, EPA published a Direct to Final Rule extending the deadline for submitting a Notice of Planned Participation (NOPP) for facilities ceasing coal use by December 31, 2028. Facilities meeting specific requirements could submit an NOPP by June 27, 2023. In compliance with 40 CFR §423.19(f)(1), DTE Electric Company (DTE) submitted the Cessation of Coal NOPP for Monroe Power Plant (MONPP) Units 3 and 4 on April 28, 2023.

In May 2024, EPA released the 2024 ELG Supplemental Rule, establishing additional 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 plants; the final rule is pending. Despite these developments, DTE's compliance strategy for MONPP remains unchanged.

DTE has implemented Best Available Technology (BAT) for BATW compliance on Units 1 and 2, which is complete; and is pursuing early cessation of coal use for Units 3 and 4. Enclosure 1 provides a status update for Units 1 and 2. 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,

A handwritten signature in black ink, appearing to read "Daniel Casey". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel Casey  
Plant Manager, Monroe Power Plant  
Energy Supply DTE Electric  
734-384-2203

Enclosures

Cc: Alexandria Seeger - EGLE, Jackson District Office  
Jason Logan - DTE EM&S, Monroe Power Plant  
Claire Souder - DTE EM&S, Monroe Power Plant  
Christopher Paquette - DTE EM&S  
Barry Marietta - DTE EM&S  
Marcela Orlandea - DTE EM&S

## Enclosure 1

### Unit 1 & Unit 2 Best Available Technology for Bottom Ash Transport Water 2025 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**

DTE initiated the conceptual design for Submerged Grind Conveyors (SGCs) in October 2021 and finalized technical specifications in March 2022. SGCs were installed on Units 1 and 2 at Monroe Power Plant to replace the existing sluicing system. Each unit includes three SGCs that collect ash from the boilers. The new bottom ash handling system removes bottom ash from submerged hoppers, dewateres it, and conveys it to a common Sicon conveyor for transport to a new ash storage bunker. From there, the ash is either shipped for beneficial use or disposed of at a regulated facility. The water is 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 2024. 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 completed in early January 2025. Unit 1 pre-outage construction began late-February 2025 and was completed by mid-September 2025. Unit 1 Tie-in outage began in early October 2025 and was completed in early December 2025. Both units are now in operation with the new bottom ash system that eliminates the BATW.

<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	100%
<b>Unit 1 Tie-In Outage</b>	10/3/2025	12/5/2025	100%
<b>Unit 2 Tie-In Outage</b>	11/1/2024	1/8/2025	100%

## Enclosure 2

### Unit 3 & Unit 4 Early Cessation of Coal 2025 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. 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 to Final Rule, DTE has evaluated the feasibility of coal cessation on Units 3 and 4 at MONPP. DTE submits this 2025 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 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 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 and Potential Milestone Delays**

This annual progress report reflects the most accurate information available to meet the requirements of NPDES Permit MI0001848 I.A.15.c.1. However, the following items may impact the information provided in this Notice of Planned Participation (NOPP) in future submittals:

1. **Integrated Resource Plans** – An updated IRP will be submitted to the Michigan Public Service Commission (MPSC) in 2026.
2. **Other Regulatory Filings** – Many projects required for compliance with Effluent Limitation Guidelines (ELG) will also need approval through future regulatory filings, including electric rate cases. Outcomes of these proceedings may impact the scope and timing of this NOPP.
3. **Regulatory Changes and Rule Modifications** – In September 2025, the U.S. Environmental Protection Agency (EPA) proposed the ELG Deadline Extensions Rule to extend compliance deadlines for coal-fired power plants. While this proposed rule does not currently affect the ELG compliance strategy at MONPP, the final rule—or other future regulatory changes—could require changes to DTE’s compliance strategy.
4. **Other Factors** – Additional considerations, such as legal challenges to EPA’s ELG rules or future rulemakings by current or subsequent administrations, may also affect this NOPP