17 October 2016

Via Email

Mr. William Neal, P.E.
Technological Specialist
DTE Electric Company
One Energy Plaza
Detroit, MI 48226

Subject: Periodic Structural Stability Assessments
Monroe Power Plant Ash Basin Facility
Monroe, MI

Dear Mr. Neal:

This letter presents Geosyntec Consultants’ (Geosyntec’s) initial structural stability assessment for DTE Electric Company’s (DTE’s) Monroe Power Plant Ash Basin (Ash Basin). Initial and periodic structural stability assessments of the Ash Basin is required under the United States Environmental Protection Agency (USEPA) Coal Combustion Residual (CCR) Rule (CCR Rule) published on 17 April 2015 (40 CFR 257.73(d)(1)). Under the CCR Rule:

“The owner or operator of the CCR unit must conduct initial and periodic structural stability assessments and document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein.”

Geosyntec performed a series of slope stability analyses as part of §257.73(e) – Periodic Safety Factor Assessments; and performed an inspection of the Ash Basin in 2015 as part of §257.83 – “Inspection Requirements for CCR Surface Impoundments of the CCR Rule”. Results of safety factor analyses indicate that the Ash Basin embankment meet the minimum safety factor criteria per §257.73(e). As part of 2015 annual inspection, Geosyntec reviewed construction documents, operating records, operational procedures, and instrumentation results at the Ash Basin. Based on the safety factor assessment and the annual inspection results, Geosyntec concludes that the Monroe Ash Basin facility was designed, constructed, operated and maintained with generally accepted good engineering standards.”
QUALIFICATIONS OF LICENSED PROFESSIONAL ENGINEER

John Seymour is a qualified licensed professional engineer with over 30 years of experience in civil and geotechnical engineering associated with dams.

CERTIFICATION

I, John Seymour, am a qualified licensed professional engineer in Michigan have evaluated the Ash Basin and hereby certify that the structural stability assessment has been conducted in accordance with the requirements of §257.73(d).

Certified by:

[Signature]

Date 10/17/2016

John Seymour, P.E.
Michigan License Number 620103356
Senior Principal