

CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT PER 40 CFR 257.102 (b)

SITE INFORMATION

Site Name / Address	DTE Energy St. Clair Power Plant Bottom Ash Basin #2 (east) / 4877 M-29, East China, MI 48054		
Owner Name / Address	DTE Electric Company / One Energy Plaza, Detroit, MI 48226		
CCR Unit	Ash Pond	Final Cover Type	N/A
Reason for Initiating Closure	Known final receipt of waste	Closure Method	Closure by Removal

CLOSURE PLAN DESCRIPTION

<p>(b)(1)(i) – Narrative description of how the CCR unit will be closed in accordance with this section.</p>	<p>The Ash Pond will be dewatered to facilitate CCR removal and decontamination of the unit. Closure operations will involve: (i) CCR removal by excavation of the ash pond, (ii) removal or decontamination of any areas affected by releases of CCR, (iii) demolition/abandonment of associated non-earthen features, and (iv) regrading to final desired grades using borrow soil for fill, as needed. In accordance with 257.102(b)(3), this initial written closure plan will be amended to provide additional details after the final engineering design for the closure by removal is completed. This initial closure plan reflects the best information available to date.</p>
<p>(b)(1)(ii) If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.</p>	<p>CCR will be removed primarily by excavation of the ash pond. The underlying and surrounding soils will be removed or decontaminated. If necessary and as confirmed by groundwater monitoring results, the upper-most usable aquifer will be flushed, pumped, and/or treated. Wastes generated will be disposed in compliance with applicable regulations.</p>

INVENTORY AND AREA ESTIMATES

(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit	2080 cubic yards
(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover	0.59 acres

CLOSURE SCHEDULE

<p>(b)(1)(vi) – Schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including major milestones ...and the estimated timeframes to complete each step or phase of CCR unit closure.</p>	
<p>The milestone and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Amendments to the milestones and timeframes will be made as more information becomes available.</p>	
Initial Written Closure Plan Placed in Operating Record	October 17, 2016
Notification of Intent to Close Placed in Operating Record	2020
Agency coordination and permit acquisition	
<ul style="list-style-type: none"> • Coordinating with state agencies for compliance • Acquiring state permits 	2023 (estimated) 2024 (estimated)
Mobilization	2024 (estimated)
Dewater ash pond	2024 (estimated)
CCR removal and decontamination	2025 (estimated)
Estimate of Year in which all closure activities will be completed	2025

Certification by qualified professional engineer appended to this plan.

Certification Statement 40 CFR § 257.102(b)(4) – Initial Written Closure Plan for a CCR Surface Impoundment

CCR Unit: DTE Energy St. Clair Power Plant Bottom Ash Basin #2 (east)

I, Scott G. Hutsell, being a Registered Professional Engineer in good standing in the State of Michigan, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the information contained in the initial written closure plan dated October 17, 2016 meets the requirements of 40 CFR § 257.102.

SCOTT G. HUTSELL

Printed Name

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Date

