DTE Energy Monroe Power Plant

Bottom Ash Impoundment CCR Rule Compliance Project

Annual Inspection Report - 2024

Project Number: 60733958

August 30, 2024

Prepared by:



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A. 2024 Annual Inspection Report

1. Introduction

1.1 Introduction

The 2024 Annual Inspection Report (AIR) was prepared by AECOM for the DTE Electric Company (DTE) to summarize the results of the annual inspection of the Monroe Power Plant Bottom Ash Impoundment. This annual inspection complies with the United States Environmental Protection Agency Coal Combustion Residuals Rule (40 CFR 257.83) ("CCR Rule"). Under the CCR Rule, the Bottom Ash Impoundment is an "existing surface impoundment" and must be inspected by a qualified professional engineer on a periodic basis, not to exceed one year.

1.2 Background Information

The Bottom Ash Impoundment area was constructed in the late 1960's by building a perimeter dike to surround a low area of the adjacent Lake Erie; the area south of the plant was removed from the Waters of the United States by an Act of Congress prior to plant construction. CCR materials have historically been placed and allowed to drain into the pond from the north end of the pond; these materials previously formed a delta that extended about 1/3 of the way into the pond, however a majority of the CCR material has been removed as part of ongoing closure of the impoundment. Wastewater flow into the pond ceased on October 21, 2020.

1.3 Personnel

The annual inspection was performed by Mr. Andrew N. Rodzianko, P.E., with assistance from DTE personnel. Weekly inspections have been and continue to be performed by DTE's plant personnel.

2. Annual Inspection Results

2.1 2023/2024 Inspections

DTE/AECOM performed the following visual inspections in 2023/2024:

- The annual inspection on July 18, 2024 (provided in Appendix A)
- Weekly inspections by DTE personnel during 2023 and 2024

Prior to the physical inspection on July 18th, AECOM reviewed the updated available information about the condition of the Bottom Ash Impoundment.

The annual and weekly inspections included the embankment crest, exterior slopes of the embankment, discharge structures, and discrete observations of the interior of the basins based on accessibility.

No sign of vegetative distress or structural issues were observed during the annual inspection on the embankment crest, exterior slopes of the embankment or discharge structure. These structures appeared to be in good condition. No known changes to the exterior geometry of the impoundment have occurred since the last inspection, however closure construction continues after starting in March 2021 as described below. Instrumentation related to geotechnical monitoring of the impoundment slopes is not present at the impoundment.

The water elevation of the pond is approximately ~574.5 feet above mean sea level (MSL) as noted in the inspection report in Appendix A. Water depth ranges from zero along the northern shore to 3 feet along the eastern and southern perimeter and up to about 20 feet in depth near the weir. The storage capacity of the impoundment has been estimated to be 37.2M cubic feet ("CCR Impoundment Inflow Design Flood Control System Plan: Inactive Bottom Ash Impoundment, Monroe Power Plant", AECOM revised August 30, 2024). CCR materials have not been placed in the impoundment since prior to October 2015.

Closure construction in the Bottom Ash Impoundment commenced in March 2021. As of August 2024, approximately 95% of the volume of CCR in the pond has been removed through a combination of dry and wet excavation and dredging and has been transported off-site.

Noteworthy observations are listed below, however, these conditions do not represent an immediate concern for the safe operation or stability of the Bottom Ash Impoundment and will be addressed either as part of closure activities or regular maintenance of the Bottom Ash Impoundment.

• The northern/upstream face side of the separation berm continues to show signs of erosion and sloughing, as noted in last year's report; this is especially visible on the western portion for a length of approximately 100-150' where plastic bollards have been impacted. This has occurred due to wave action and undercutting from dredging of CCR in these areas. Repair of this upstream section is anticipated to occur either with completion of the closure project or immediately after – the sloughing is not an immediate threat (a width of approximately 20 feet of the separation berm at the crest still exists and DTE has temporarily ceased vehicle traffic over the berm).

- The downslope sides of portions of the Impoundment (especially the western side) are heavily vegetated and/or below the water surface. A thorough inspection of the entire surface perimeter of the impoundment is not practical. Maintenance of the vegetation is advised.
- A few small sinkholes (between several inches up to a foot in diameter and depth) were observed in the dike immediately north of the principal spillway. It is recommended to fill these with gravel and continue to monitor and maintain.

3. Maintenance Activities in 2024

3.1 Maintenance Activities

Site access roads have been repaired/improved as part of the ongoing closure construction.

Periodic mowing of the vegetation along the perimeter is performed by DTE personnel.

4. Conclusion and Certification

4.1 Conclusion

The annual inspection did not identify any evidence of structural weakness or instability in the Bottom Ash Impoundment at DTE's Monroe Power Plant. Observations included continued inspections of the perimeter of the impoundment as well as a review of closure construction that began in March 2021.

Based on the annual inspection results and review of available data, the Bottom Ash Impoundment was designed and constructed with generally accepted good engineering standards. Additionally, the Bottom Ash Impoundment is operated and maintained using generally accepted good engineering practice.

4.2 Certification

Certified by:

Andrew N. Rodzianko, P.E. Michigan License #6201061456

Cedaw N. Radinh

Senior Civil Engineer

ANDREW N.
RODZIANKO
ENGINEER
No.
6201061456
GOFESSIONADOOO

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	/Owner e Bottom Ash Impoundment / DTE Energy	County Monro	,		State Michigan		
Inspecto Andrev	ed By w N. Rodzianko, P.E.		Date 07/18/2024		Phone No 440-785		
Type of	Impoundment: 🗌 Concrete Gravity 🛛 Embankment		Type of Inspection	☐Initial	Weather [Wet [⊠ Dry
Concrete	e Arch 🔲 Stone Masonry 🔲 Concrete Buttress 🔲 Other	٢	Periodic Follow	vup 🗌 Other	☐Snow Co	over 🗌 Oth	her
As docur 03/04/24 Monroe	Description mented in its Hazard Potential Classification Assessment, of 4, AECOM's opinion is that the Bottom Ash Impoundment Power Plant falls under the definition of the CCR rule as a nt hazard potential CCR surface impoundment.	at the		nt Jnsatisfactory Not rated			
with ong completi repair is Water le impound water dis	the impoundment was found to be in satisfactory conditions to the impoundment was found to be in satisfactory conditions are considered by removal activities being performed with ion expected later this year. Some minor maintenance an recommended along the perimeter slopes, as noted hereigned differential is approximately 2 feet between the diment and surrounding surface waters to the west (cooling scharge channel) and approximately in equilibrium with or atures to the north, east, and south.	on d in.	Actions None Maintenance Monitoring Minor Repair Engineering	Recommenda	etter etter study y EOR	See Action	ıs
Pool Le	vel (ft) imately 574.50		Total Precipitation sirn/a	nce last inspecti	on		
1 1 1 1 1 1 1							
	De	ahlama				COVE	D.
	□ 1. None □ 7. Wave Erosion □ 13 □ 2. Vegetation > 2" dia. □ 8. Slides □ 14 □ 3. Veg. height > 6" □ 9. Depressions □ 15 □ 4. High bushes □ 10. Bulges □ 16 □ 5. Animal Burrows □ 11. Cracks □ 17	oblems . Scarps . Sloughir . Holes . Underm . Displace	ng ⊠20 □21 nining □22 ed joints ⊠23	Exposed reinfor Veg. or sedimer Displaced rip rap Sparse rip rap Other Erosion Other	nt in rip rap	COVE Veget Rip ra Concre Aspha	tation ip rete alt
UPSTREAM SLOPE/FACE	Comments /Action Items West – tall vegetation needs maintenance. Unable to ok South – separation berm actively eroding/sloughing, how analyses have been recently performed to confirm low r East and North – riprap recently placed along majority of scheduled for completion later this year. Some vegetation	oserve sig wever DTE isk of ber f slopes a	Ins of erosion, animal bu E is aware of the issue ar m failure. s part of closure activitie	rrows, etc. nd mitigating the I			ity
	Actions ☐None ☑Maintenance ☐Monit	oring		Engineering			

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			PRO	BLEMS				COVER:
	☐ 1. None ☐ 2. Vegetation >2" dia ☐ 3. Veg. height >6" ☐ 4. High bushes ☐ 5. Animal Burrows ☐ 6. Livestock damage	9. Unlevel	ons	☐ 12. Cr ☐ 13. De ☐ 14. Di ☐ 15. Ex	racks eteriorated joint isplaced joints kposed reinforce ettlement	⊠19. Sinkh	ing ioles les	□ Vegetation □ Rip rap □ Concrete □ Asphalt ☑ Other
TOP OF DAM/CREST	Comments /Action Item West – tall vegetation n filled with gravel and me maintenance. South – separation bern to vehicular traffic until East and North – riprap scheduled for completion	ns needs maintenance ionitored. Minor ru m roadway along cr I such time repairs o recently placed alo	uts/depressions in Test in fair conditions to the complete	in some antion, howe	reas should be f ever is at risk du	illed/leveled as part o ue to erosion noted alo	f regular roadv ong slope. DTE	has closed road
	Actions	None	⊠Mainten	ance	⊠Monitoring	g Minor Re	epair 🔲 I	Engineering
			PRO	BLEMS				COVER:
	☐ 1. None ☐ 2. Vegetation >2" dia ☐ 3. Veg. height >6" ☐ 4. High bushes ☐ 5. Poor grass cover ☐ 6. Animal Burrows ☐ 7. Livestock damage	☐ 10. Boils ☐ 11. Pudo ☐ 12. Eros ☐ 13. Slop	age s dles ion e instability	☐16. De	cour	22. Displaced join 23. Deteriorated j 24. Exposed reinf 25. Riprap needs 26. Veg. or sedim 27. Other	joints orcement attention	
	28. Does standing water	r or seepage contai	in sediment?				□Yes □No	o ⊠NA
ш	29. Is there natural hillsi	ide seepage in emb	oankment area?				□Yes ⊠No	o □NA
SLOPE/FACE	Describe seepage with regard to quantity and clarity (turbidity). Note changes: N/A							
DOWNSTREAM S	Comments /Action Items West – tall/woody vegetation should be removed, however is not a significant concern due to fair overall condition of embankment and small water level differential. Unable to observe signs of erosion, animal burrows, etc. South – some vegetation growth but in good condition. East and North – vegetation along slope of adjacent process water ditch in fair condition, no signs of erosion observed.							
	Actions [□None	⊠Mainten	ance	☐Monitoring	g ☐Minor Re	epair ∐I	Engineering

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	PROBLEMS						
		8. Wetness 9. Seepage 10. Boils 11. Puddles 12. Erosion 13. Slope instability 14. Scarps	☐ 15. Sloughs/bulge☐ 16. Depressions☐ 17. Undercutting☐ 18. Rutting/rills☐ 19. Cracks☐ 20. Scour☐ 21. Spalling☐ 19. Cracks☐ 21. Spalling☐ 21. Spalling☐ 22. Spalling☐ 23. Spalling☐ 23. Spalling☐ 24. Spalling☐ 24. Spalling☐ 26. Spalling☐ 26. Spalling☐ 27.	22. Displaced joints 23. Deteriorated joints 24. Exposed reinforcement 25. Riprap needs attention 26. Veg. or sediment in rip rap 27. Other	□ Vegetation □ Rip rap □ Concrete □ Asphalt □ Other		
		or seepage contain sedimen		Yes No	D ⊠NA		
ACT	Describe seepage with real N/A	gard to quantity and clarity	(turbidity). Note changes:				
ONT	Comments /Action Items						
TOE CONTACT	Toe submerged under wa	iter on all sides and unable t	to observe.				
	Actions \succeq		intenance Monito	oring Minor Repair 🗌	Engineering		
	□1 None		PROBLEMS		COVER:		
	☐ 1. None ☐ 2. Vegetation >2" dia. ☐ 3. Veg. height >6" ☐ 4. High bushes ☐ 5. Poor grass cover ☐ 6. Animal Burrows ☐ 7. Livestock damage	 8. Wetness 9. Seepage 10. Boils 11. Puddles 12. Erosion 13. Slope instability 14. Scarps 	☐ 15. Sloughs/bulges☐ 16. Depressions☐ 17. Undercutting☐ 18. Rutting/rills☐ 19. Cracks☐ 20. Scour☐ 21. Spalling☐ 19. Cracks☐ 21. Spalling☐ 22. Spalling☐ 22. Spalling☐ 22. Spalling☐ 22. Spalling☐ 23. Spalling☐ 23	22. Displaced joints 23. Deteriorated joints 24. Exposed reinforcement 25. Riprap needs attention 26. Veg. or sediment in rip rap 27. Other	□ Vegetation □ Rip rap □ Concrete □ Asphalt □ Other		
TS	Comments /Action Items		d previously	·			
ONTACTS	No issues observed other	than maintenance, as noted	d previously.				
ABUTMENT CONTACTS							

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	OBSERVATIONS						
	□No Spillway	⊠Yes □No					
	Is spillway control system operating properly?						
	PROBLEMS	CHANNEL LINING					
JAY	□ 1. None □ 9. Misalignment □ 16. Undermining □ 23. Sloughing □ 3. Debris □ 10. Joints leaking □ 17. Voids □ 24. Scarps □ 15. Plugged/Clogged □ 15. Plugged/Clogged □ 16. Undermining □ 24. Scarps □ 18. Cracks □ 19. Holes □ 26. Boils □ 27. Outlet erosion □ 27. Outlet erosion □ 28. Displaced rip rap □ 29. Sparse rip rap □ 29. Sparse rip rap □ 29. Sparse rip rap □ 29. Sparse rip rap □ 30. Other	□ Vegetation □ Rip rap □ Concrete □ Asphalt □ Other					
PRINCIPAL SPILLWAY	Comments /Action Items 207.5 foot long steel weir observed to be inactive (water level below weir) with minor corrosion and some leakage a between steel weir plates, but otherwise in good condition. Downstream outlet channel obstructed with overgrown should be removed/maintained to allow for better future inspection and to allow for clear flow path when spillway a riprap observed immediately downstream of weir.	n vegetation which activates. Some					
	Actions None Maintenance Monitoring Minor Repair OBSERVATIONS	Engineering					
	No emergency spillway Same as principal spillway	CHANINE LINING					
	PROBLEMS To the second	CHANNEL LINING					
>-	□ 1. None □ 5. Joint deterioration □ 9. Undermining □ 14. Displaced rip rap □ 2. Debris in channel □ 6. Joint displacement □ 10. Voids □ 15. Sparse rip rap □ 1. Cracks □ 12. Holes □ 16. Outlet undercutting □ 17. Inadequate capacity □ 18. Other	□ Vegetation □ Rip rap □ Concrete □ Asphalt □ Other					
EMERGENCY SPILLWAY	Comments /Action Items Actions None Maintenance Monitoring Minor Repair	□Engineering					

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		Observations					
	1.	Is discharge system operating properly?			Yes	_No ⊠N/	/A
	2.	Valves and operators in good condition?			Yes [No ⊠N/	
	3.	Walkway in good condition?			⊠Yes [No No	
	4.	Is there any turbidity observed at the outlet?				No No	
	5.	Seepage at pipe outlet			☐Yes [No ⊠N/	
	6.	No Bottom Drain			Yes [No ⊠N/	
	7.	Bottom Drain Operable			Yes [No ⊠N/	
	8.	Subsurface Drain Dry			Yes [No ⊠N/	
	9.	Subsurface drain muddy flow			Yes [No⊠N	
	10.	Subsurface drain obstructed			Yes	No⊠N	
뽘	11.	Animal guard			Yes	No ⊠N/	
CT		other			Yes [_No⊠N/	/A
OUTLET STRUCTURE	Commen Walkway	nts /Action Items y/structure observed to be in satisfactory condition with minor wear and impacts to observe, however noted turbidity curtains on impoundment/	t/inlet side to be in		not activition.		
	Actions	OBSERVATION	ingiviii	ioi itopaii		Linginiooniii	9
	Has the	re been a sudden drop in the level of the Impoundment			Пүе	es 🔲 No	
	Tido tito	PROBLEMS					
		ne 3. Skimmer 5. Whirlpools 6	6. Sinkholes]7. Unwar	nted grow	th in pond	water
RESERVIOR/POOL	None Actions	its /Action Items ☑None ☐Maintenance ☐Monitoring ☐Minor Repa	air ∐Engineer	rina			
	/ (0110113	Extreme Environment Environment Environment	ап штідіпссі	9			

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			OBSER	VATIONS		
	1.	leachate/stormwater (RCP; CN	1P) drain pipes that pass th	rough or under an ash	basin intact?	Yes □No ⊠N/A
	2.	Drainage/ diversion ditches/rip	orap-lined channels in good	d condition?		Yes □No ⊠N/A
	3.	Other steel structures/steel re	inforcement in concrete st	ructures in good condi	tion?	Yes □No ⊠N/A
	4.	Other concrete structures in go	ood condition?			Yes □No ⊠N/A
	5.	Overflow pipes and flap gates	on filter dam/ drain pipe fi	Iter zone in good cond	tion?	Yes □No ⊠N/A
	6.	Howell Bunger Valves in good	condition?			Yes □No ⊠N/A
	7.	Weirs in good condition?				Yes No N/A
	8.	Perimeter Fences and Gates in		Yes □No ⊠N/A		
	9.	Security devices in good condi	tion			Yes □No ⊠N/A
出	10.	Signs in good condition			\boxtimes	Yes No N/A
OTHER	11.	Instrumentation in good condi	tion			Yes No N/A
	12.	Reference monuments/Survey		Yes □No ⊠N/A		
		other				Yes □No ⊠N/A
		nts /Action Items				
	None					
	0 - 1 '	Mana a			DM:Di-	□ Fu stu s satura
	Actions	S ⊠None	Maintenance	☐Monitoring	☐Minor Repair	☐ Engineering
Ara tha	ro onu ot	har abnarmal canditions at t	ا مطاعات مصام میں مصمرا مطا	ممياط مممم م جاماد الم	nublia baaltbaafatu	ar walfara, tha
		her abnormal conditions at t natural resources Yes	.ne impoundment that ⊠No	could pose a risk to	public fleatiff, Safety	or wellare; the
environ	iment or	naturarresourcesres	MINO			
		11	11 11			
Inspec	tor Sign	nature (Mally 1	Per inko			
Data:	to. o.g.	07/18/2024				



Photo 1: Western perimeter dike, looking north. Gravel road in satisfactory condition. Heavy vegetation visible on both slopes, with large/woody vegetation on downstream/west slope.



Photo 3: View of downstream side of principal spillway structure from north. Riprap outlet channel overgrown with vegetation.



Photo 2: View of upstream side of principal spillway structure from north. Small sinkhole visible in foreground. A few similar sinkholes behind concrete bin block, not visible.



Photo 4: View of principal spillway walkway from south.



Photo 5: Impoundment side of western perimeter dike, looking north. Photo taken from separation berm at southwest corner of impoundment.



Photo 6: Sloughing and erosion of south separation berm (impoundment side).



Photo 7: South separation berm, looking west. Vegetation growth on both sides. Roadway in fair condition, however closed to vehicular traffic due to north (impoundment side) slope sloughing as seen in photo 6.



Photo 8: East internal slope of impoundment, view from south separation berm at southeast corner of impoundment. Riprap cover, typical of east and north slopes. Some vegetation growth near water line.