



December 20, 2023

Ms. Melinda Steffler, District Supervisor
Water Resource Division
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092

Re: Bottom Ash Transport Water (BATW)- 2023 Annual Progress Report (Cessation of Coal Burning Activities)
DECO - Belle River Plt
NPDES Permit No. MI0038172

Dear Ms. Steffler,

This submittal is the follow-up annual progress report per 40 CFR 423.19(f)(3), and per Permit Section I.A.12.d.1. The following enclosure provide the updates as required by 40 CFR 423.19(f)(4).

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 2020 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 established a compliance subcategory for electric generating unit(s) that will cease the use of coal either by retirement or by fuel conversion. The 2020 Rule allows operation of such unit(s) until December 31, 2028, if companies fulfill certain requirements regarding existing treatment technologies, the proper submittal of a Notice of Planned Participation (NOPP), and subsequent annual reports. DTE Electric Company (DTE) submitted the Cessation of Coal NOPP for Belle River Power Plant (BLRPP) in October 2021 in accordance with 40 CFR 423.19(f)(1).

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Chesney".

Mark Chesney
Plant Manager
Belle River Power Plant
Energy Supply - DTE Electric Company
586-484-5197

Enclosure

Cc: Sabrina Good - EGLE, Southeast Michigan District Office
Jamie Stanislowski - DTE EM&S, Belle River Power Plant
Christopher Paquette - DTE EM&S
Barry Marietta - DTE EM&S
Marcela Orlandea - DTE EM&S
Lisa Lockwood - DTE EM&S

Enclosure 1

Bottom Ash Transport Water – 2023 Annual Progress Report

Unit Identification

Belle River Power Plant (BLRPP) is located at 4505 King Road, China Twp., Michigan. BLRPP consists of two B&W subcritical wall-fired boilers firing low sulfur subbituminous coal rated for a maximum gross output of 1,260 MW. The units started commercial operation in 1984 and 1985. This cessation of coal NOPP will apply to both Unit 1 and Unit 2 at BLRPP.

Method for Cessation of Coal Burning Activities

The 2020 Rule details that the cessation of coal could occur by either unit retirement or repowering to another fuel source. The option to repower to another fuel source is the option DTE has selected.

Expected Date of Coal Cessation

DTE's current Integrated Resource Plan (IRP), approved on July 26, 2023, provides a detailed analysis of DTE's long term generation plan and proposes to convert BLRPP from a baseload coal plant to a natural gas peaking resource. The IRP proposes to convert Unit 1 in 2025 and Unit 2 in 2026, pending approval of the future regulatory filing, including but not limited to electric general rate cases.

Regulatory Approval of Coal Cessation

The NOPP submitted in October 2021 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 2023 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 they become available, may provide additional documentation in support to achieve compliance with ELG requirements.

Timeline for Achieving Coal Cessation

Belle River Unit 1 is expected to cease operation of coal burning activities by the end of 2025 and Unit 2 by the end of 2026. The table below presents an itemized timeline for achieving cessation of coal at BLRPP.

Cessation of Coal Burning Project Schedule			
<i>Key Activity or Milestone</i>	<i>Start Date</i>	<i>Completion Date</i>	<i>Progress</i>
Issue for EPC Bid	01/2023	06/2023	100%
Review & Award Bid – Limited Notice to Proceed	06/2023	12/2023	100%
Major Equipment Delivery	-	04/2025	0% - On Track
Pre-Outage Construction	04/2025	09/2025	0% - On Track
Unit 1 Tie-In, Testing & Commissioning	09/2025	12/2025	0% - On Track
Unit 2 Tie-In Testing & Commissioning	09/2026	12/2026	0% - On Track

*Dates current as December 2024

Risks / Milestone Delays

The information presented in this annual report represents the best information available to meet the requirements of the initial NOPP submittal and of NPDES Permit MI0038172 I.A.12.d.1. DTE has identified the following factors that could result in modifications of information submitted in this report:

1. Regulatory Changes / Rule Modifications – On August 3, 2021, EPA initiated a new rulemaking to revise the 2020 Rule for certain wastewater discharge limits. The proposed rulemaking or other potential future regulatory changes could impact DTE’s ELG compliance strategy including the use of the cessation of coal compliance subcategory and associated NOPP process.
2. Other Factors to Be Determined – Other factors including, but not limited to, long lead material construction and delivery delays, outage schedule changes, as well as, legal challenges to 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 initial NOPP. DTE will submit appropriate documentation pursuant to 40 CFR 423.19(f)(3) if changes to the NOPP are needed or transition to other compliance options pursuant to 40 CFR 423.13(o).