

DTE Energy Company  
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**DTE Energy**



Sent via email to [Hoffman.stephen@epa.gov](mailto:Hoffman.stephen@epa.gov)

August 18, 2011

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re. U.S. EPA Monroe Power Plant CCR Site Assessment Report

Dear Mr. Hoffman:

On July 29, 2011, The Detroit Edison Company (“Detroit Edison”) received a letter from U.S EPA along with the Final Report, Round 7 Dam Assessment, DTE Energy Monroe Power Plant Fly Ash Basin and Bottom Ash Storm water Pond. The letter dated July 26, 2011 requested that Detroit Edison inform U.S EPA regarding how it intends to address each of the recommendations found in the final report and that such response should include specific plans and schedules for implementing each of the recommendations.

Following please find Detroit Edison’s response. For the convenience of the reader, Detroit Edison’s response uses the same alphanumeric heading that the agency used in Enclosure 2 concerning “Monroe Power Plant Recommendations”. Those six recommendations, which began with recommendation 3.2 (1) and ended with recommendation 3.4 (1.), are paraphrased below and are each followed by the Company’s response.

***Recommendation 3.2 (1) Following vegetation removal, DTE should further review areas of potential seepage; additionally settlement analyses may be appropriate where construction has occurred.***

Response: The source of the seepage that GZA observed along the north embankment is being further investigated during the reconstruction of the embankment this summer. Surficial soils on the embankment experienced several sloughs and heavy vegetation contributed to a terraced effect which may have been the source of the observed seeps. (i.e., although the embankment consisted of largely impermeable clay, the numerous

sloughs and terraces were retaining rainwater, and causing toe seeps-even long after a precipitation event.) With the removal of all surficial soils across the entire height of the embankment, a visual inspection of the clay core will be made prior to reconstruction. The visual inspection will be documented by photographs that will be included in the Annual Inspection Report presented to the Michigan Department of Environmental Quality. The investigation will be terminated if the visual inspection confirms that no seeps exist anywhere along the height or length of the clay core. If any seeps in the clay core are uncovered a monitoring program, commensurate with the type and character of the seep, will be developed and described in the annual inspection report.

With regard to the suggested settlement analyses; if any settlement is uncovered during the inspection program, it will be noted in the Annual Inspection Report along with a monitoring program, commensurate with the type and character of settlement.

***Recommendation 3.2 (2) Although not required, a formal Emergency Action Plan for the fly ash basin should be developed, possibly as part of an existing safety plan, and should be communicated to site personnel and local emergency response agencies.***

Response: The Monroe Power Plant has an existing safety plan, known as the Integrated Contingency Plan (ICP). The company plans to revise this ICP, by the end of this calendar year, to incorporate a Fly Ash Basin Emergency Action Plan into this ICP.

***Recommendation 3.3(1) Clear vegetation from the channel downstream of the stilling wells***

Response: Vegetation has already been cleared.

***Recommendation 3.3(2) Install a staff gauge near the discharge structure in order to take monthly measurements***

Response: A staff gauge, verified by surveying, has been installed.

***Recommendation 3.3(3) If DTE has the opportunity to stop the discharge, inspect the integrity of the discharge pipes.***

Response: The company recognizes that the EPA recommendation only requests an inspection should the opportunity for an inspection arise and agrees with the recommendation to perform such inspection when an opportunity exists. Detroit Edison agrees that there is no immediate need for inspection. The steel discharge pipes have been operational for 3 decades and are encased in concrete, and there is no indication of the slightest seep from the system. The company expects to temporarily cease its discharge and allow for an inspection of the pipes in 2014, provided EPA's January 2014 revisions to the Effluent Guideline for Steam Electric Power Plants, continue to allow a discharge from the pipes. In addition, during the refurbishment process, through 2013, the company will continue with its quarterly detailed reconnaissance of the entire embankment and its daily inspection and would immediately implement an inspection of the discharge pipes if any of these inspections discovered any seepage from this area.

***Recommendation 3.4(1) Clear the areas of heavy vegetation from Stations 0+00 to 62+00 and 150+00 to 182+00 to facilitate visual observation of potential sloughs in accordance with the existing embankment mitigation plan.***

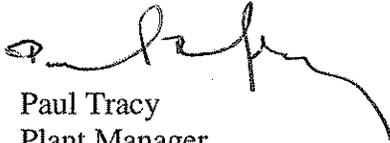
**Response:** As of July, 2011, the heavy vegetation/brush has been removed from the following areas for a total of 12,100' out of 18,190':

- 14 – 35
- 60 – 160

The remainder will be completed no later than Nov., 2012.

Detroit Edison trusts that this reply appropriately addresses each of the recommendations and appreciates the opportunity to work with the agency and with GZA in this matter. Please contact me if you request any more information.

Sincerely,



Paul Tracy  
Plant Manager  
Monroe Power Plant