UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 26, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Paul Tracy, Plant Manager
The Detroit Edison company
3500 E. Front Street
Monroe, Michigan 48161

Dear Mr. Tracy,

On September 23 and 24, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Monroe Power Plant facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain “wet” handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Monroe Power Plant facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Monroe Power Plant facility is enclosed. This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Monroe Power Plant facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by August 23, 2011. Please send your response to:

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

If you are using overnight of hand delivery mail, please use the following address:

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

Enclosure 2

Monroe Power Plant Recommendations (from the final assessment report)

The following recommendations and remedial measures generally describe the recommended approach to address current deficiencies at the Fly Ash Basin. Prior to undertaking recommended maintenance, repairs, or remedial measures, the applicability of environmental permits needs to be determined for activities that may occur within resource areas under the jurisdiction of the appropriate regulatory agencies.

3.2 Studies and Analyses

GZA recommends the following studies and analyses:

1. During execution of the embankment mitigation plan, it is our opinion DTE should further review potential areas of seepage along the downstream slope following vegetation removal and perform seepage analyses in those areas deemed necessary. Additionally, following construction, settlement analyses may be appropriate where reconstruction has occurred to confirm the settlement monitoring occurring at the Fly Ash Basin is adequate; and,
2. Although not required by DNRE Part 115 regulations, it is our opinion that DTE develop a formal EAP for the Fly Ash Basin and communicate that plan to Site personnel and the local emergency response agencies. This EAP could become a part of existing safety plans for the Site specifically addressing conditions of the Fly Ash Basin.

3.3 Recurrent Operation & Maintenance Recommendations

GZA recommends the following operation and maintenance level activities:

1. Clear vegetation from the channel downstream of the stilling wells;
2. Install a staff gauge near the discharge structure in order to take monthly measurements of the Fly Ash Basin water surface elevation; and,
3. If DTE has the opportunity to stop discharging from the Fly Ash Basin for a limited time period, inspect the discharge pipes from the discharge structure to the stilling wells to verify that they are operating correctly and are in good condition. This may be performed by video photograph.

3.4 Repair Recommendations

GZA recommends the following repairs which may improve the overall condition of the Fly Ash Basin, but do not alter the current design of the embankment. The recommendations may require design by a professional engineer and construction contractor experienced in embankment construction.

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.

3.5 Alternatives

There are no practical alternatives to the repairs itemized above.