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## MEMORANDUM

12 October 2016  
File No. 43019-003

SUBJECT: Post-Closure Care Plan  
Northern Indiana Public Service Co.  
Michigan City Generating Station  
Boiler Slag Pond  
Michigan City, Indiana

Haley & Aldrich, Inc. has assisted Northern Indiana Public Service Co. (NIPSCO, NiSource) with creating the written Post-Closure Care Plan (Plan) for the Boiler Slag Pond at the Michigan City Generating Station (MCGS) located near Michigan City, Indiana. This Plan addresses the requirements of §257.104 Post-closure care requirements, specifically section §257.104(d) for written post-closure plans, of the USEPA's Final CCR Rule (CCR Rule) effective 19 October 2015. The information required for the Plan for the Boiler Slag Pond is presented in the following sections in accordance with §257.104(d) of the Final CCR Rule.

In accordance with §257.104(c) of the Final CCR Rule, NIPSCO will conduct post-closure care activities for 30 years following completion of closure activities for the Boiler Slag Pond. This assumes that the site is not under groundwater assessment monitoring. In the event that the unit is under assessment monitoring, post-closure care activities will continue to be implemented beyond the 30-year timeframe until the groundwater monitoring program returns to detection monitoring in accordance with §257.95.

The final cover system including stormwater controls will be inspected on no less than a yearly basis by appropriately qualified personnel per §257.104(b) of the Final CCR Rule for settlement, seepage, erosion, scarps, sloughs, wind erosion, storm water erosion and/or ponding, animal burrows, and other conditions, as appropriate, potentially affecting the overall integrity of the final cover system. In addition, run-on and run-off controls will be inspected for signs of erosion and seepage. As determined necessary to maintain the structural integrity of the final cover system and storm water controls, any deficiencies noted during inspections of the final cover system and its components will be repaired.

The Boiler Slag Pond does not include a leachate collection system, therefore, post-closure inspection or maintenance requirements do not apply for this unit.

At the time of this initial Plan, it is understood that the groundwater monitoring system and overall program is being developed in accordance with §257.90 through §257.98 of the Final CCR Rule. During the post-closure care period, NIPSCO will maintain the integrity of the monitoring wells, bollards, well



surface completion, and sampling equipment in secure and proper working condition for the required sampling intervals. The monitoring wells and sampling equipment will be inspected at each sampling event. Any identified damage or deficiency in the integrity of the monitoring wells or components will be repaired to maintain the integrity of the system. The monitoring wells will be re-surveyed if surface completions are modified. NIPSCO will be developing the monitoring wells and certifying the system in documents under separate cover as required by the Final CCR Rule. Those documents should be reviewed for applicability and additional information during the post-closure care period.

In accordance with §257.104(d)(1)(ii), the name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period are provided below.

Name: Joseph E. Kutch  
Address: 2755 Raystone Dr.  
Valparaiso, IN 46383  
Telephone Number: 219-476-1511  
Email Address: <https://www.nipsco.com/contact-us/customer-feedback>

After closure of the Boiler Slag Pond, NIPSCO intends to maintain the property as part of the industrialized site with no public access. NIPSCO has no planned use for the property during the post-closure period at this time. Considerations for post-closure use of the property shall not disturb the integrity of the containment system. If a specific use for the unit is determined requiring structural bearing capacity, a CCR Rule compliant cap and cover will be installed, engineered with the possibility of supporting future infrastructure. NIPSCO will amend this Plan at the appropriate time if and when a planned post-closure use for the property has been determined.

This document and all attachments serve as the initial written post-closure plan.

This initial written post-closure care plan or any subsequent written post-closure care plan will be amended in the future as provided for in 40 CFR §257.104(d)(3).

A record of amendments to the plan will be tracked below. The latest version of the post-closure plan will be noted on the front cover of the plan.

Version	Date	Description of Changes Made
1	12 October 2016	Initial Issue

## Professional Engineer Certification

I certify that this initial written Post-Closure Plan for the NIPSCO Boiler Slag Pond at the Michigan City Generating Station meets the USEPA's Final CCR Rule requirements of §257.104(d)(1).

Signed:   
Consulting Engineer

Print Name: Steven F. Putrich  
Indiana License No.: 11200566  
Title: Vice President  
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:

