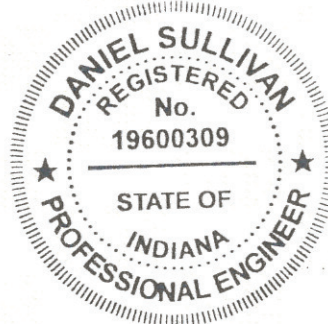


October 4, 2017

**Certification of Design and Construction of Groundwater Monitoring System (40 CFR §257.91(f))****Northern Indiana Public Service Company  
Bailly Generating Station  
Chesterton, Indiana****CCR Management Unit referred to as Secondary #1**

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of groundwater monitoring systems for surface impoundments and landfills, do hereby state that I am qualified in the subject matter of CCR groundwater monitoring. I have personally examined and am familiar with the information related to design and construction of groundwater monitoring systems for CCR management units located at the Northern Indiana Public Service Company (NIPSCO) Bailly Generating Station, prepared by Golder Associates Inc. and dated October 2017. Based on an inquiry of those individuals immediately responsible, and on supporting information which I understand to be true, accurate and complete, I believe the design and construction of the groundwater monitoring system for the surface impoundment referred to as Secondary #1 meets the applicable requirements of the CCR Final Rule. Secondary #1 is monitored by a well network that exceeds the minimum number of upgradient wells and meets the minimum number of downgradient wells. The minimum number of three downgradient wells is appropriate due to small dimensions of the unit, the close spacing (i.e., lateral distance) between downgradient wells, and the presence of adjacent surface impoundments that inhibit the ability to gain access to install additional monitoring wells. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the groundwater monitoring system for the regulated CCR management unit referred to as Secondary #1 has been designed and constructed to meet the applicable requirements of 40 CFR §257.91 and corresponding State of Indiana requirements.



Daniel Sullivan  
Indiana Professional Engineer  
License #19600309

10-6-17

Date