Annual CCR Fugitive Dust Control Report

in support of

40 CFR Part 257

for Northern Indiana Public Service Company LLC's

Bailly Generating Station

NIPSCO

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Introduction

The rule titled "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities" (hereinafter the "CCR Rule") was published as a final rule in the *Federal Register* on April 17, 2015 [80 FR 21302] and codified at 40 CFR 257 Subpart D.

Northern Indiana Public Service Company LLC (NIPSCO) is the owner and operator of the Bailly Generating Station (BGS) located in Porter County in Chesterton, Indiana. The two coal-fired electric utility steam generating units at BGS were retired from service on May 31, 2018:

- Unit 7 is a cyclone coal-fired boiler with a design heat input capacity of 1,638 million British thermal units per hour (MMBtu/hr)
- Unit 8 is a cyclone coal-fired boiler with a design heat input capacity of 3,374 MMBtu/hr

Per 40 CFR 257.80(a), the owner or operator of a coal combustion residuals (CCR) landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. These measures are contained in the CCR Fugitive Dust Control Plan for BGS that was timely placed in NIPSCO's operating record.

Furthermore, 40 CFR 257.80(c) requires the owner or operator of the CCR unit to prepare an annual CCR fugitive dust control report. As of May 31, 2018, NIPSCO permanently retired both Unit 7 and Unit 8. Consequently, no additional CCR are being generated by the facility. This document constitutes the annual CCR fugitive dust control report for BGS.

Requirement 1 – Actions Taken to Control CCR Fugitive Dust

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust."

[40 CFR §257.80(c)]

The following actions were taken to control CCR Fugitive Dust, in accordance with the CCR Fugitive Dust Control Plan for BGS.

Fly Ash

Remaining fly ash previously produced from Units 7 and 8 can currently only be unloaded in a conditioned state, since those two generating units have been retired.

Conditioned Fly Ash Handling

When fly ash is unloaded to trucks in a conditioned state, CCR fugitive dust emissions are controlled by a water spray mixed with the fly ash. The conditioned ash is loaded into open trucks which are then covered with tarps.

Dry Fly Ash Handling

Due to the Unit 7 and Unit 8 retirement, no fly ash is produced or handled dry.

Conditioned fly ash is transported by open trucks that are covered with tarps. The conditioned fly ash is taken directly to the landfill at NIPSCO's Rollin M. Schahfer Generating Station, or on rare occasions is unloaded and staged at the fly ash conditioning facility (also located at the Rollin M. Schahfer Generating Station) for final delivery to the landfill.

Bottom Ash

Bottom ash is not produced from Unit 7 or Unit 8.

Slag

The slag previously produced from Units 7 and 8 historically was wet sluiced to a surface impoundment and stored there until the material was reclaimed. Due to the nature of slag and the wet sluicing process, there are not CCR fugitive dust concerns from this process.

Gypsum

Synthetic gypsum historically was produced from the wet FGD system that serves Units 7 and 8. The operational nature of the wet FGD systems produced gypsum already containing moisture. The conditioned gypsum was transferred via an enclosed conveyor to an enclosed storage building, where any remaining gypsum is still transferred to trucks by front end loader. The trucks are then covered and taken to the Rollin M. Schahfer Generating Station for final delivery to the landfill.

Haul Roads

Water trucks were used to wet the haul roads to minimize the release of dust from transportation activities at the station. Road watering was suspended during periods of freezing conditions when watering would have been inadvisable for safety conditions (e.g., icy roads).

Requirement 2 – Record of Citizen Complaints

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes… a record of all citizen complaints."

[40 CFR §257.80(c)]

NIPSCO has not received any citizen complaints regarding fugitive dust events at BGS as of November 22, 2019.

Requirement 3 – Corrective Measures

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes… a summary of any corrective measures taken."

[40 CFR §257.80(c)]

There has not been a need for corrective measures, as NIPSCO has not identified any fugitive dust conditions that would require corrective measures or received any citizen complaints regarding fugitive dust at BGS as of November 22, 2019.