Annual CCR Fugitive Dust Control Report in support of

40 CFR Part 257

for Northern Indiana Public Service Company LLC's

Michigan City Generating Station



Table of Contents

| Introduction | . 3 |
|--|-----|
| Requirement 1 – Actions Taken to Control CCR Fugitive Dust | |
| Bottom Ash | ۵. |
| Slag | ۵. |
| FGD Residue and Fly Ash | ٠.4 |
| Haul Roads | ۷. |
| Requirement 2 – Record of Citizen Complaints | . 5 |
| Requirement 3 – Corrective Measures | - 4 |

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 Michigan City Generating Station (MCGS) located in La Porte County in Michigan City, Indiana. There is one coal-fired electric utility steam generating unit at MCGS:

• Unit 12 is a cyclone coal-fired boiler with a design heat input capacity of 4,650 million British thermal units per hour (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 MCGS 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. This document constitutes the annual CCR fugitive dust control report for MCGS.

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 MCGS.

Bottom Ash

Bottom ash was not produced from Unit 12.

Slag

The slag produced from Unit 12 is wet sluiced to an indoor submerged flight conveyor system and subsequently stored in an adjacent indoor containment until reclaimed. Due to the nature of slag and the wet sluicing process, there are not CCR fugitive dust concerns from this process.

FGD Residue and Fly Ash

FGD residue and fly ash are pneumatically conveyed from the FGD baghouse to the FGD waste silo. This silo is equipped with a bin vent filter. FGD residue and fly ash is unloaded from the silo to trucks in a dry state, with fugitive dust emissions controlled by use of a telescopic chute with a vacuum system that returns fugitive fly ash dust to the silo. The bin vent filter on the silo controls emissions resulting from the vacuum return process. The truck loading station for the silo contain interlock systems that require the overhead doors on the loading station to be closed when the trucks are being loaded. The FGD residue and fly ash are then transported to NIPSCO's Rollin M. Schahfer Generating Station to be conditioned and landfilled.

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 MCGS as of December 11, 2021.

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 MCGS as of December 11, 2021.