



Northern Indiana Public Service Company LLC (NIPSCO) R.M. Schahfer Generating Station (RMSGs)
Wheatfield, Jasper County, Indiana
Waste Disposal Area

STATEMENT OF CERTIFICATION

NIPSCO RMSGs WASTE DISPOSAL AREA

**DOCUMENTATION FOR NO ALTERNATIVE DISPOSAL CAPACITY FOR EXISTING CCR SURFACE
IMPOUNDMENTS – 2024 ANNUAL UPDATE**

Indiana Administrative Code, 329 IAC 10-9-1

WSP USA Inc. (WSP) understands that following 2022 communications about its R. M. Schahfer Generating Station's (RMSGs', Site's) critical role in electric generation baseload and peak demand needs of the Midcontinent Independent System Operator (MISO), the regional transmission organization (RTO) of which Northern Indiana Public Service Company LLC (NIPSCO) is a part, NIPSCO identified the need to extend coal-fired generation at RMSGs beyond the originally planned 2023 shutdown date. NIPSCO intends to continue using coal-fired Units 17 and 18 at RMSGs with a revised planned permanent cessation of all coal-fired generation activities by end of Q4 2025. Until then, Units 17 and 18's coal-fired boilers will continue to generate coal combustion residuals (CCR) waste streams that, in compliance with the conditions of 329 IAC 10-9-1, can be managed in existing on-Site CCR impoundments. The MSRB and MCWB impoundments, previously addressed in a 2019 Documentation and subsequent annual updates, are no longer in active service, ceased receipt of CCR waste streams in October 2020, are undergoing closure by removal construction activities in accordance with a NIPSCO Closure Plan approved by IDEM March 17, 2023, and are expected to complete closure September 2024. The WDA is the only remaining surface impoundment at RMSGs that is regulated as a CCR surface impoundment and continues to accept CCR waste streams. NIPSCO submitted a Closure Plan to IDEM on IDEM on December 22, 2023. The WDA will continue to operate as a CCR surface impoundment through the cessation of all RMSGs coal-fired boilers in 2025 and will complete closure activities no later than October 17, 2028.

I, Richard Wesenberg, certify that I have personally examined and am familiar with the applicable provisions of Indiana Administrative Code, 329 IAC 10-9-1 and with the information submitted in the NIPSCO RMSGs CCR Surface Impoundment No Alternative Disposal Capacity Documentation – 2024 Annual Update, prepared by WSP USA Inc., dated February 15, 2024. I believe that the information contained therein is true, accurate and has been prepared in accordance with good engineering practices and that the documentation provided in accordance with 329 IAC 10-9-1 supports that there continues to be no existing alternative disposal capacity on- or off-Site that could accept the flow currently being impounded in the WDA at RMSGs.

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