



February 13, 2026

Project No. 31406779

Joseph E. Kutch, Manager, Environmental Compliance
Northern Indiana Public Service Company LLC
2755 Raystone Drive
Valparaiso, IN 46383

**RE: NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC, R.M. SCHAFER
GENERATING STATION WHEATFIELD, INDIANA
CCR SURFACE IMPOUNDMENT NO ALTERNATIVE DISPOSAL CAPACITY
DOCUMENTATION – 2026 ANNUAL UPDATE
PURSUANT TO INDIANA ADMINISTRATIVE CODE 329 IAC 10-9-1**

Dear Mr. Kutch:

In February 2019, on behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates USA Inc. (Golder), now WSP USA Inc. (WSP), prepared the coal combustion residuals (CCR) Surface Impoundment No Alternative Disposal Capacity Documentation (Documentation) pursuant to the Federal CCR Rule requirements at 40 CFR §257.103(b)(1) and corresponding state regulations under Indiana Administrative Code (IAC) 10-9-1 for the NIPSCO R. M. Schahfer Generating Station (RMSGs, Site) in Wheatfield, Indiana. The 2019 Documentation was prepared for then-active CCR surface impoundments referred to as the Waste Disposal Area (WDA), Metal Cleaning Waste Basin (MCWB), and Material Storage Runoff Basin (MSRB), otherwise referred to as the CCR Units. Each of these unlined CCR Units failed to successfully demonstrate the groundwater separation (location restriction) standard of 40 CFR §257.60 and, lacking an extension as provided in 40 CFR §257.103(b)(1), were required to have ceased receipt of waste and begun the closure process by April 11, 2021.

As allowed by the applicable provisions of 40 CFR §257.103(b), NIPSCO intended to continue using the WDA, MCWB, and MSRB to manage CCR and non-CCR waste streams until a planned retirement of all coal-fired units in 2023 and closure of the impoundments. As part of the 2019 Documentation, Golder evaluated potential disposal options and found that there was no existing alternative disposal capacity on- or off-Site that could accept the flow being impounded in the RMSGs MSRB, MCWB, and WDA.

In early 2020, Golder reviewed the information included in the 2019 Documentation and 1) confirmed with NIPSCO that there had been no operational changes at RMSGs since the previous documentation was prepared and 2) verified that the wastewater flows evaluated in 2019 were still representative of the current operations at RMSGs. As such, there was still no existing alternative disposal capacity on- or off-Site that could accept the volume of flow being impounded daily in the MSRB, MCWB, and WDA. Golder prepared and certified summary information to this effect in the Documentation first annual update, dated February 2020.

Following the February 2020 annual update, NIPSCO began making operational changes at RMSGs in preparation for the permanent cessation of all coal-fired units in 2023, reducing both influent into and reliance on two of the CCR Units for management of waste streams. The operational changes made, and related activities

that were performed since the 2020 update, included 1) retirement of two of RMSGS' four coal-fired boilers (Units 14 and 15); 2) completion of a wastewater piping re-direct project and thus cessation of discharge of CCR and non-CCR waste streams into the MCWB and MSRB in October 2020; and 3) submittal of the Closure Application for the MCWB, MSRB, and a third inactive CCR surface impoundment, the Drying Area, the three impoundments collectively called the Multi-Cell Unit (MCU), to IDEM which subsequently (March 2023) approved the Closure Plan. Thus, the WDA remained the only operational CCR Rule-regulated surface impoundment accepting CCR waste streams. As of mid-2020, NIPSCO planned to continue operation of the WDA as a CCR surface impoundment through the cessation of all RMSGS coal-fired boilers in 2023 and complete closure activities no later than October 17, 2028.

On September 28, 2020, the U.S. Environmental Protection Agency (EPA) enacted new Federal CCR Rule regulations affecting the 40 CFR §257.103 alternative closure requirements, replacing the 40 CFR §257.103(b)(1) option NIPSCO had been pursuing with similar, but more substantial, requirements outlined in 40 CFR §257.103(f)(2). The new regulations applicable to NIPSCO's WDA impoundment near-term operation and longer-term closure strategy required a similar, yet more rigorous, evaluation of the availability of alternative on- or off-Site disposal capacity as options to the continued use of the existing surface impoundment. In accordance with the new regulatory requirements at 40 CFR §257.103(f)(2), NIPSCO/Golder performed this evaluation and submitted a Demonstration of Permanent Cessation of a Coal-Fired Boiler(s) by a Date Certain (hereinafter Demonstration) on October 30, 2020, followed by Demonstration Addendum #1 (Addendum #1) in November 2020. The Demonstration and Addendum #1, which anticipated the continuation of coal-fired generation and use of the WDA until 2023, are currently awaiting technical review by EPA. Following 2022 communications about RMSGS'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 NIPSCO is a part, NIPSCO identified the need to extend coal-fired generation at RMSGS beyond the originally planned 2023 retirement date. NIPSCO/WSP Golder then prepared and submitted Demonstration Addendum #2 in August 2022, where it also awaits technical review by EPA. As discussed in Addendum #2, coal-fired generation and production of CCR and associated waste streams were to continue until December 2025, and these and related post-generation waste streams would have to continue to be managed in the sole remaining CCR Rule-compliant surface impoundment (i.e., WDA) as there was no alternative capacity on- or off-Site.

On December 23, 2025, the U.S. Department of Energy (DOE) issued a 90-day emergency order under Section 202(c) of the Federal Power Act requiring RMSGS Units 17 and 18 to continue operating until March 23, 2026. Their continued operation requires, by extension, continued operation of the WDA to manage the CCR and non-CCR waste streams being generated. DOE has the authority to extend such emergency orders for additional 90-day periods upon their expiration, has done so in similar situations at other power plants, and NIPSCO expects similar extensions to be issued for RMSGS operations. Because NIPSCO has no control over, nor the ability to predict, when the Section 202(c) emergency order will ultimately be allowed to lapse, the timing for initiating retirement activities for Units 17 and 18 remains uncertain.

Consequent active operation of the WDA, including management of wastes associated with ongoing coal-fired generation and, following cessation of such at some indeterminate future date, impoundment of boiler wash water associated with decommissioning, is now planned to continue into 2026 or beyond. Following post-retirement boiler washdown activities and a second wastewater piping re-direct project, the WDA will cease receipt of all CCR and non-CCR waste streams, at which time closure activities will begin. The extension of WDA operations will impact the implementation of closure activities, which were scheduled to be completed no later than October

17, 2028, as required by 40 CFR §257.103(f)(2). Under a November 25, 2025, proposed rulemaking (FR 54611), EPA proposed a revision of 40 CFR §257.103(f)(2). Specifically, this revision would allow a three-year extension until October 17, 2031, for subject facilities to complete closure of CCR surface impoundments larger than 40 acres. This revision would specifically apply to and include the WDA.

In furtherance of its closure objectives and timeline for the WDA, on December 22, 2023, NIPSCO submitted for IDEM review a final design application (i.e., Closure Plan). A revision to the Closure Plan, which addressed IDEM requests for additional information and review comments, was submitted on February 11, 2025. The Closure Plan is currently awaiting final review and approval from IDEM. Although not addressed in this IDEM IAC 10-9-1 regulation-specific annual update, NIPSCO has similarly prepared annual updates, including the most recent version in October 2025, in accordance with the Federal CCR Rule requirements at 40 CFR §257.103(f)(2)(x).

On behalf of NIPSCO in early 2021, in accordance with the requirements of 40 CFR §257.103(b)(1), Golder again evaluated NIPSCO operations and verified water flows to be consistent with those conditions as of October 2020, post the wastewater piping re-direct project. Based on the reevaluation, Golder prepared and certified summary information to this effect in an annual update on progress toward achieving alternative capacity on- or off-Site in the Documentation second annual update, dated April 2021.

On behalf of NIPSCO in 1Q 2022, in accordance with the requirements of 40 CFR §257.103(b)(1), Golder once again evaluated NIPSCO operations and verified water flows to be consistent with those conditions as of October 2021, post cessation of operations of coal-fired boiler Units 14 and 15, and as they existed in early 2021. Based on the reevaluation, Golder prepared and certified summary information in an annual update on progress toward achieving alternative capacity on- or off-Site in the Documentation third annual update, dated April 2022.

On behalf of NIPSCO in 1Q 2023, in accordance with the requirements of 40 CFR §257.103(f)(2)(x), WSP once again evaluated NIPSCO operations and verified water flows to be generally consistent with those conditions as of October 2021, post cessation of operations of coal-fired boiler Units 14 and 15, and as they existed in early 2021. WSP also noted the upcoming closure activities associated with the MCU, specifically the necessity of the WDA as the receiving impoundment for dewatering fluids, and the WDA's continued role in receiving waste streams from common sumps serving stormwater and wastewater systems. Based on the reevaluation, WSP prepared and certified summary information in an annual update on progress toward achieving alternative capacity on- or off-Site in the Documentation fourth annual update, dated April 2023.

On behalf of NIPSCO in 1Q 2024, in accordance with the requirements of 40 CFR §257.103(f)(2)(x), WSP once again evaluated NIPSCO operations and verified water flows to be generally consistent with those conditions as of October 2021, post cessation of operations of coal-fired boiler Units 14 and 15, and as they existed in early 2021. WSP also noted the ongoing closure activities associated with the MCU, specifically the necessity of the WDA as the receiving impoundment for dewatering fluids, and the WDA's continued role in receiving waste streams from common sumps serving stormwater and wastewater systems. Based on the reevaluation, WSP prepared and certified summary information in an annual update on progress toward achieving alternative capacity on- or off-Site in the Documentation fifth annual update, dated April 2024.

On behalf of NIPSCO in 1Q 2025, in accordance with the requirements of 40 CFR §257.103(f)(2)(x), WSP once again evaluated NIPSCO operations and verified water flows to be generally consistent with those conditions as of October 2021, post cessation of operations of coal-fired boiler Units 14 and 15, and as they existed in early 2021. As detailed below, WSP notes that closure of the MCU was completed in 2024 and, as a result, discharge of dewatering fluids associated with these closure activities permanently ceased, reducing reliance on the WDA.

The WDA's continued role in receiving CCR waste streams from ongoing coal-fired generation and high-volume non-CCR waste streams from common sumps serving stormwater and wastewater systems remains unchanged, however.

Although EPA enacted the new 40 CFR §257.103(f)(2) regulations which superseded and replaced 40 CFR §257.103(b)(1), IDEM, which previously adopted the Federal 257.103(b)(1) regulatory language within IAC 10-9-1, has yet to similarly adopt the Federal 40 CFR §257.103(f)(2) language. Therefore, on behalf of NIPSCO, and in accordance with the requirements of 40 CFR §257.103(b)(1) and corresponding IAC 10-9-1 regulations, as still applicable, and consistent with 40 CFR §257.103(f)(2), WSP has performed an annual review of RMSGS CCR waste generation and management and NIPSCO's progress toward achieving alternative capacity on- or off-Site.

This correspondence prepared pursuant to 329 IAC 10-9-1, presents the Documentation seventh annual update, indicating the 1) continued lack of alternative capacity, and 2) progress toward closure of the coal-fired units. Relative to RMSGS and the WDA, it also provides the status of related CCR surface impoundment closures.

Progress Toward Permanent Cessation of Coal-Fired Boiler Operations/Closure of Surface Impoundments

As of October 1, 2021, NIPSCO permanently retired Units 14 and 15, representing two of the four coal-fired boilers at RMSGS. According to NIPSCO representatives, washdown operations have been completed on Unit 14 but washdown continues on Unit 15. These activities represent key preparatory steps toward final decommissioning of the retired units. NIPSCO began closure of the MCU following IDEM's approval of the Closure Plan in March 2023. NIPSCO conducted CCR removal and disposal in a secure CCR Rule-compliant landfill cell, following which backfill and emplacement of a low-permeability cover system were performed, with final closure construction substantially complete August 28, 2024. The Construction Quality Assurance Certification Report was submitted to IDEM on December 20, 2024, and is currently under review.

Remaining Units 17 and 18 continue to operate, with management of CCR and non-CCR waste streams produced from these Units being provided by the WDA. Cessation of operations of the two coal-fired boilers has been delayed by DOE's issuance of a 202(c) emergency order. This federal requirement to continue operating is, in turn, delaying overall Site retirement plans, which had been planned consistent with NIPSCO's planned permanent cessation of all coal-fired generation activities by the end of Q4 2025, as outlined in the Demonstration and Addenda #1 and #2. Although 202(c) emergency orders are issued for 90 days, NIPSCO notes that DOE has been routinely renewing them for additional 90-day periods at other subject facilities. NIPSCO has the same expectation for RMSGS Units 17 and 18. Thus, NIPSCO cannot predict a date by which the 202(c) order will lapse, nor when retirement and associated final closure activities can begin.

Absent the DOE 202(c) emergency order, NIPSCO has likewise been making other progress toward closure of the WDA. A final design featuring a clean closure approach with a closure-in-place contingency has been completed, and a Closure Plan was submitted to IDEM for review and approval on December 22, 2023. Throughout 2024, NIPSCO has conducted various meetings with IDEM to discuss the closure approach(es), answer questions, and provide responses to requests for additional information. NIPSCO submitted Closure Plan Revision 02 on February 11, 2025, has held additional meetings regarding details of the plan with IDEM, as requested, and is currently awaiting IDEM final approval.

Ongoing Need for Operation of the WDA

As evidenced by the recent retirement of two of its four coal-fired boilers, NIPSCO is progressing toward permanent cessation of all coal-fired generation activities at RMSGS. Units 17 and 18 continue to operate as mandated by a DOE emergency order, generating substantial volumes of CCR and non-CCR waste streams as detailed in the Demonstration and discussed below. Thus, the need remains for existing capacity and continued operation of the WDA to meet both ongoing coal-fired generation and current and future decommissioning demands related to the boilers. As the only remaining operational CCR Rule regulated impoundment on-Site, discharge to the WDA is the only viable alternative for the management of high-volume effluent.

As designed and constructed, most of NIPSCO's wastewater and stormwater systems feature a network of common sumps which ultimately discharge to the WDA. Therefore, until cessation and decommissioning actions are completed, the WDA remains essential to the management of these high-volume waste streams. However, NIPSCO has already begun preparations for the eventuality of ceasing all discharge to the WDA in anticipation of closure. In July 2025, WSP completed a design for the separation and rerouting of sump and stormwater drain lines away from the WDA into alternative non-regulated (under the CCR Rule) receiving water bodies. Construction, testing, and commissioning of the new discharge system are currently on hold pending potential renewals of the Section 202(c) emergency order, prior to initiating WDA closure activities.

Continued Lack of Alternative Capacity

At the time of preparation of the 2025 Report, the measurable reduction in Site-wide generation of CCR and non-CCR waste streams resulting from these boiler retirements could not be definitively quantified due to the absence of flow metering capacity in individual feed and discharge lines. However, in the determination of alternative capacity and reliance for the operation of the WDA, the combined estimated average daily waste stream flow of 5.04 MGD reported in the Demonstration (i.e., October 2020) from Units 14 and 15, was removed from the combined total waste stream flow estimates considered in 2021, 2022, 2023, and 2024 Progress Reports. Note that such an approach assumed an instantaneous and maximum waste stream flow reduction (and does not account for the compulsory boiler washdown flow from Units' decommissioning) and was, as a result, considered a conservative capacity demand-based approach to this update. Due to ongoing Site operations and maintenance activities, volumes of multiple individual CCR and non-CCR effluent streams being discharged to the WDA were estimated to be between 0.34 MGD and 0.86 MGD, with a combined estimated daily flow of 2.64 MGD.

In preparation of the 2026 Report, WSP still dealt with the issue of the absence of flow metering capacity in individual feed and discharge lines. However, for this 2026 version, WSP was able to obtain and rely on a February 2023 revision of the RMSGS water balance, which provided more recent estimates of wastewater flow volumes, prepared for NIPSCO by Ramboll Group. As a check, WSP also engaged in written communications with NIPSCO operations and environmental compliance personnel regarding operational changes and impacts on waste stream generation since the prior annual reports. Based on review of this updated information, individual maximum CCR effluent stream volumes from ongoing Site operations were estimated to be approximately 0.680 MGD and 1.105 MGD, and individual maximum non-CCR effluent stream volumes were estimated to be 0.925 MGD. Thus, the updated evaluation indicated a combined estimated maximum daily discharge of 2.71 MGD to the WDA.

Consistent with the requirements of 40 CFR §257.103(b)(1) and 40 CFR §257.103(f)(2), each as applicable, and employing processes consistent with those used in the evaluation of alternative disposal capacity for the Demonstration, WSP, on behalf of NIPSCO, performed a reevaluation of its previous assessment. Based on

NIPSCO's representations and WSP's review of current conditions, the continued lack of alternative capacity is supported by the following conclusions:

- No other existing on-Site impoundment system can accept partial or total flows of CCR waste streams that are currently discharging into the WDA
- No existing transport conduit nor alternative disposal capacity is available for CCR and non-CCR waste streams in the existing on-Site wastewater treatment plant (WWTP)
- No existing off-loading or conveyance piping infrastructure to support on- or off-Site alternative disposal of CCR or non-CCR waste streams is in place and, as a practical matter, commercial tanker truck capacity for individual waste streams of between 0.680 and 1.105 MGD, up to a combined daily maximum volume of 2.71 MGD, is not possible to dependably source considering equipment and driver availability, impairments due to seasonal weather conditions, etc.
- An employee and public health and safety risk associated with off-Site disposal would result due to additional truck traffic both on-Site and on the public roads, as well as an increased carbon footprint with added truck traffic
- An increased risk of release that could harm the environment would result each time the wastewater is handled (i.e., pumped/loaded for off-Site transport, unloaded at off-Site receiving facilities)

NIPSCO previously evaluated the feasibility of constructing new alternative CCR and non-CCR waste management options on-Site, even though RMSGS will cease all coal-fired generation with the intention to close the WDA no later than October 17, 2031. As in 2020 and confirmed in 2022 (Demonstration Addendum 2), due to Site-specific factors (e.g., space limitations, shallow depth to groundwater and thus the inability to reasonably achieve the 40 CFR §257.60(a) five-foot separation from the upper limit of the uppermost aquifer), permitting and/or regulatory hurdles, and building timeframes, construction of new alternative management facilities is infeasible.

Based on current operating conditions and an updated evaluation regarding alternative disposal capacity, WSP concludes that no viable alternative to continued use of the WDA currently exists.

Conclusion

WSP has prepared this report to provide documentation pursuant to 329 IAC 10-9-1, as applicable, that provides an annual update to the existing alternative disposal capacity on- or off-Site, without consideration of increase in costs or inconvenience to NIPSCO. The Report documents a) the continued lack of alternative capacity on-Site and off-Site, and b) NIPSCO's progress toward the closure of the RMSGS surface impoundment referred to as the WDA. Due to the DOE's issuance of a 202(c) emergency order to continue operating past its most recently planned December 2025 retirement date, NIPSCO currently anticipates delays in the 2Q 2026 cease receipt date, and the formerly identified final closure date of October 2028 as outlined in the Demonstration and Addenda #1 and #2. In accordance with EPA's proposed rulemaking (FR 54611), modifying 40 CFR §257.103(f)(2), NIPSCO now anticipates a final closure date no later than October 17, 2031.

A Statement of Certification is included in attached Exhibit A. It is WSP's opinion that the information contained herein 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 is no existing alternative disposal capacity on- or off-Site that could accept the flow currently being impounded in the WDA at RMSGS.

Sincerely,

WSP USA INC.



Mark Haney

Senior Vice President, Sr Technical Principal



John Puls, P.E.

Vice President, Senior Technical Specialist

MH/JP/bjb

Attachments: Exhibit A – Statement of Certification

<https://golderassociates.sharepoint.com/sites/134674/project%20files/6%20deliverables/feb%202022%20-%20iac%20no%20alt%20update/no%20alternative%20annual%20update%20-%20feb22%20iac%20update.docx>

EXHIBIT A

Northern Indiana Public Service Company LLC (NIPSCO), R.M. Shahfer Generating Station (RMSG)
Wheatfield, Jasper County, Indiana
CCR Unit – Waste Disposal Area (WDA)

STATEMENT OF CERTIFICATION**NIPSCO RMSG WASTE DISPOSAL AREA****DOCUMENTATION FOR NO ALTERNATIVE DISPOSAL CAPACITY FOR EXISTING CCR SURFACE
IMPOUNDMENTS – 2026 ANNUAL UPDATE**

Indiana Administrative Code, 329 IAC 10-9-1

WSP USA Inc. (WSP) understands that following 2022 communications about its R. M. Shahfer Generating Station's (RMSG's, 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 RMSG beyond the originally planned 2023 shutdown date. NIPSCO intended to continue using coal-fired Units 17 and 18 at RMSG with a revised planned permanent cessation of all coal-fired generation activities by end of Q4 2025.

However, on December 23, 2025, the U.S. Department of Energy (DOE) issued a 90-day emergency order under Section 202(c) of the Federal Power Act requiring these two units to continue operating until March 23, 2026. DOE has the authority to extend such emergency orders for additional 90-day periods upon their expiration, has done so in similar situations at other power plants, and NIPSCO expects similar extensions to be issued for RMSG operations. NIPSCO has no control over and cannot predict when the Section 202(c) emergency order will ultimately be allowed to lapse and, thus, retirement and decommissioning of Units 17 and 18, followed by closure of the WDA, can begin.

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, were certified closed by an Indiana-licensed professional engineer on December 20, 2024. The Construction Quality Assurance Certification Report was also submitted to IDEM on December 20, 2024, and is currently under review. The WDA is the only remaining surface impoundment at RMSG that is regulated as a CCR surface impoundment and continues to accept CCR waste streams. NIPSCO submitted a Closure Plan to IDEM on December 22, 2023, and Closure Plan Revision 02 encompassing responses to all previous IDEM Requests for Additional Information (RAIs) on February 11, 2025. The WDA will continue to operate as a CCR surface impoundment through the cessation of all RMSG coal-fired boilers and associated washdown/decommissioning, and now plans to complete closure activities in accordance with the Closure Plan, pending IDEM approval, no later than October 17, 2031.

I, John Puls, 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 RMSG CCR Surface Impoundment No Alternative Disposal Capacity Documentation – 2026 Annual Update, prepared by WSP USA Inc., dated February 13, 2026. I believe that the information contained therein is true, accurate, and has been

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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.



John Puls, PE
Vice President, Senior Technical Specialist
Registered Professional Engineer
State of Indiana No.: PE12000338

