August 16, 2022

Submitted via email

Mr. Michael Regan, Administrator US EPA
1200 Pennsylvania Avenue, N.W.
Mail Code 5304-P
Washington, D.C. 20460

Re: Northern Indiana Public Service Company LLC
RM Schahfer Generating Station, Wheatfield, IN
Demonstration – Addendum 2, Pursuant to 40 CFR Part 257.103(f)(2)

Dear Administrator Regan:

Northern Indiana Public Service Company LLC (NIPSCO LLC) is providing the enclosed *Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain* Addendum 2 (Demonstration Addendum 2) for approval by the United States Environmental Protection Agency (US EPA). Approval of NIPSCO LLC's 257.103(f)(2) Demonstration by the US EPA will allow NIPSCO LLC to continue use of the Waste Disposal Area ash pond (WDA) in operation at the RM Schahfer Generating Station located in Wheatfield, IN (RMSGS, Site), after April 11, 20221. This approximately 80-acre pond will complete closure no later than October 17, 2028, as provided in the enclosed Demonstration Addendum #2.

This Demonstration Addendum 2, provides a new date of permanent cessation of coal-fired boilers at the RMSGS and NIPSCO's continued commitment to cease operation and complete closure the WDA no later than October 17, 2028, as stipulated in 257.103(f)(2)(iv)(B). Furthermore, to meet the requirements of 40 CFR § 257.103(f)(2), Demonstration Addendum 2 supplies information updated since November 2020 (i.e., the date Demonstration Addendum 1 was prepared) with respect to groundwater monitoring and corrective action activities at RMSGS.

As explained and justified herein, cessation of coal-fired generation at RMSGS will now be December 31, 2025, providing nearly three years to a) complete boiler shutdown processes, some of which are expected to generate significant volumes of CCR and non-CCR waste streams, b) reduce and/or eliminate other ongoing influent streams, c) optimize the closure plan and gain regulatory agency approval for the WDA closure approach, and d) complete closure construction. Following cease receipt

of WDA waste streams (Q2 2026), NIPSCO estimates a timeframe of approximately two and a half years to achieve final closure of the WDA including the professional engineer's certification, thereby achieving final closure by September 17, 2028, and meeting the 40 CFR § 257.103(f)(2) deadline of October 17, 2028.

This Demonstration Addendum 2 in combination with Demonstration (Golder, October 2020) and Demonstration Addendum 1 (Golder, November 2020) meet the requirements of 40 CFR § 257.103(f)(2).

Following US EPA guidance, the enclosed Demonstration Addendum 2 was submitted via email to Richard Huggins, Frank Behan, Kirsten Hillyer and Lydia Anderson. I may be contacted at (219) 680-8628 or mturman@nisource.com with questions or comments.

Sincerely,

Maureen Turman

Maureen Turman
NiSource Director Environmental Policy and Sustainability

Enclosure

CC: Richard Huggins, US EPA
Frank Behan, US EPA
Kirsten Hillyer, US EPA
Lydia Anderson, USEPA