

HALEY & ALDRICH, INC. 6500 Rockside Road Suite 200 Cleveland, OH 44131 216.739.0555

## **MEMORANDUM**

12 October 2016 File No. 43019-001

SUBJECT: Post-Closure Care Plan

Northern Indiana Public Service Co. R.M. Schahfer Generating Station Landfill

Wheatfield, Indiana

Haley & Aldrich, Inc. has assisted Northern Indiana Public Service Co. (NIPSCO) with creating the written Post-Closure Care Plan (Plan) for the Landfill at the R.M. Schahfer Generating Station (RMSGS) located near Wheatfield, Indiana. This Plan addresses the requirements of §257.104 Post-closure care requirements, specifically section §257.104(d) for written post-closure plans, of the USEPA's Final CCR Rule effective 19 October 2015. The information required for the Plan for the Landfill is presented in the following sections in accordance with §257.104(d) of the Final CCR Rule.

In accordance with §257.104(c) of the Final CCR Rule, NIPSCO will conduct post-closure care activities for 30 years following completion of closure activities for the Landfill. This assumes that the site is not under groundwater assessment monitoring. In the event that the unit is under assessment monitoring, post-closure care activities continue to be implemented beyond the 30-year timeframe until the groundwater monitoring program returns to detection monitoring in accordance with §257.95.

The final cover system including stormwater controls will be inspected on no less than a yearly basis by appropriately qualified personnel per §257.104(b) of the Final CCR Rule for settlement, seepage, erosion, scarps, sloughs, wind erosion, storm water erosion and/or ponding, animal burrows, and other conditions, as appropriate, potentially affecting the overall integrity of the final cover system. In addition, run-on and run-off controls will be inspected for signs of erosion and seepage. As determined necessary to maintain the structural integrity of the final cover system and storm water controls, any deficiencies noted during inspections of the final cover system and its components will be repaired.

The existing leachate collection and removal system at the unit will be operated and maintained to collect and remove leachate from the landfill during the post-closure care period. In accordance with §257.70, the leachate collection and removal system will be operated to maintain less than a 30-centimeter depth of leachate over the liner and operated to minimize clogging during the post-closure care period.

At the time of this initial Plan, it is understood that the groundwater monitoring system and overall program is being developed in accordance with §257.90 through §257.98 of the Final CCR Rule. During



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the post-closure care period, NIPSCO will maintain the integrity of the monitoring wells, bollards, well surface completion, and sampling equipment in secure and proper working condition for the required sampling intervals. The monitoring wells and sampling equipment will be inspected at each sampling event. Any identified damage or deficiency in the integrity of the monitoring wells or components will be repaired to maintain the integrity of the system. The monitoring wells will be re-surveyed if surface completions are modified. NIPSCO will be developing the monitoring wells and certifying the system in documents under separate cover as required by the Final CCR Rule. Those documents should be reviewed for applicability and additional information during the post-closure care period.

In accordance with §257.104(d)(1)(ii), the name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period are provided below.

Name: Joseph E. Kutch Address: 2755 Raystone Dr.

Valparaiso, IN 46383

Telephone 1-800-464-7726

Number:

Email Address: https://www.nipsco.com/contact-

us/customer-feedback

After closure of the Landfill, NIPSCO intends to maintain the property as part of the industrialized site with no public access. NIPSCO has no planned use for the property during the post-closure period at this time. Considerations for post-closure use of the property shall not disturb the integrity of the containment system. If a specific use for the unit is determined requiring structural bearing capacity, a CCR Rule compliant cap and cover will be installed, engineered with the possibility of supporting future infrastructure. NIPSCO will amend this Plan at the appropriate time if and when a planned post-closure use for the property has been determined.

This document and all attachments serve as the initial written post-closure plan.

This initial written post-closure care plan or any subsequent written post-closure care plan will be amended in the future as provided for in 40 CFR §257.104(d)(3).

A record of amendments to the plan will be tracked below. The latest version of the post-closure plan will be noted on the front cover of the plan.

Version	Date	Description of Changes Made
1	12 October 2016	Initial Issue



## **Professional Engineer Certification**

I certify that this initial written Post-Closure Plan for the NIPSCO Landfill at the R.M. Schahfer Generating Station meets the USEPA's Final CCR Rule requirements of §257.104(d)(1).

Signed: Consulting Engineer

Print Name: Steven F. Putrich

Indiana License No.: 11200566

Title: Vice President

Company: <u>Haley & Aldrich, Inc.</u>

Professional Engineer's Seal



