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

MEMORANDUM

7 February 2019
File No. 133442-002

SUBJECT: CCR Conceptual Closure Plan – Version #2
Northern Indiana Public Service Co.
R.M. Schahfer Generating Station – Waste Runoff Area "Drying Area"
Wheatfield, Indiana

Northern Indiana Public Service Co. (NIPSCO) operates the coal-fired R.M. Schahfer Generating Station (RMSGS) located near Wheatfield, Indiana. Since beginning operations in 1976, NIPSCO has stored and disposed of plant generated CCR in on-site ash impoundments. The ash impoundment is active and will continue to receive CCR generated by the RMSGS plant in the future. This written Closure Plan (Plan) addresses the requirements of 40 CFR §257.102 *Criteria for conducting the closure or retrofit of CCR units* of the USEPA's Final CCR Rule dated April 17, 2015 for the RMSGS Waste Runoff Area "Drying Area" (Unit).

This Plan has been developed based upon information provided by NIPSCO and describes the ash impoundment, closure plan design, a schedule for closure, and steps required to amend the closure plan in the future, if necessary. This plan calls for the impoundment to be closed by removal of the CCR and decontamination of the CCR unit (herein referred to as "closure by removal").

Currently, NIPSCO estimates it will operate the RMSGS facility through the year 2023 and begin closure of the impoundment prior to 2023. Regardless of when the impoundment is closed, the following steps will be followed for closure of the unit:

1. Finalize detailed construction plans for closure.
2. Obtain written Professional Engineer (PE) certification that design of the excavation meets the requirements of the Final CCR Rule.
3. No later than the date closure is initiated, prepare a notification of intent to close the CCR unit and place notification in the facility operating record. The notification of intent to close will include the PE certification from Step 2.
4. Commence closure no later than 30-days after known final receipt of CCR.
5. Obtain PE certification verifying closure has been completed in accordance with this Plan.
6. Within 30-days of completion of closure of the CCR unit, prepare a notification of closure of the CCR unit and place notification in the facility operating record. The notification of closure will include the PE certification from Step 5.

CCR Removal

After final receipt of CCR and dewatering activities are complete, CCR will be removed from the Unit. The above grade portion of the impoundment berms will then be graded inward to reduce interior slopes and to minimize additional stormwater run-on from outside of the impoundment boundary. Additional miscellaneous clean fill material from the RMSGS and/or other offsite sources may need to be imported in order to attain the proposed post source removal grades. After removal of all CCR, groundwater monitoring concentrations will be analyzed to confirm no exceedance of the protection standard established by §257.95(h).

The maximum volume of CCR ever stored in the unit is approximately 28,000 CY and the area of the impoundment is approximately 7.2 acres. This area is based on data provided by NIPSCO of historic impoundment boundaries. There are no planned lateral expansions of the impoundment.

Closure Schedule

An estimated schedule for completing the activities necessary to satisfy the closure by removal criteria of the CCR Rule is provided below. The schedule lists the sequential steps that need to be taken to close the impoundment. The schedule assumes that groundwater monitoring concentrations will confirm no exceedance of the protection standard established by §257.95(h).

Item #	Task Item	Completion Timeframe (months)														
		-8	-7	-6	-5	-4	-3	-2	-1		3	6	9	12	15	18
1	Prepare Construction Plans															
2	PE Design Certification															
3	Notice of Intent to Close															
4	Agency Closure Approval															
5	Cease placing CCR															
6	Commence Closure															
7	Dewater Impoundment															
8	Excavate CCR															
9	Fill/Regrade to Achieve Final Grades															
10	PE Closure Certification															
11	Notice of Closure															

NIPSCO will need to initiate some activities prior to commencing closure. As indicated on the schedule, NIPSCO will need to take action on Steps 1-4 as early as 8 months prior to the anticipated final receipt of CCR at the impoundment.

Per §257.102(e)(3) closure of the impoundment has commenced when NIPSCO has ceased sluicing CCR into the impoundment and completes any of the following actions or activities: (i) Taken any steps necessary to implement the written closure plan; (ii) Submitted a completed application for any required state or agency permit or permit modification; or (iii) Taken any steps necessary to comply with state or other agency standards that are a prerequisite, or are otherwise applicable, to initiating or completing the closure of the CCR impoundment.

NIPSCO estimates that it will operate the plant through 2023. Closure activities for the CCR impoundment are estimated to be completed by 2023.

Closure Plan Amendments

NIPSCO will amend the plan in the future as provided for in 40 CFR §257.102(b)(3). A record of amendments to the plan will be tracked below. The latest version of the closure plan will be noted on the front cover of the plan.

Version	Date	Description of Changes Made
1	12 October 2016	Initial Issue
2	7 February 2019	Date of Station and Unit Closure Updated

Professional Engineer Certification

I certify that this written closure plan for NIPSCO's Waste Runoff Area "Drying Area" at the R.M. Schahfer Generating Station meets the USEPA's Final CCR Rule requirements of §257.102(b).

Signed: _____
Consulting Engineer

Print Name: Jeffery A. Miller
Indiana License No.: 11800217
Title: Associate
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal: