



February 13, 2020

Project No. 19115105

Joseph E. Kutch, Team Leader Environmental Compliance

Northern Indiana Public Service Company
2755 Raystone Drive
Valparaiso, IN 46383

**RE: NORTHERN INDIANA PUBLIC SERVICE COMPANY, R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA
CCR SURFACE IMPOUNDMENT NO ALTERNATIVE DISPOSAL CAPACITY DOCUMENTATION –
ANNUAL UPDATE
PURSUANT TO 40 CFR 257.103(B)(1)**

Dear Mr. Kutch:

Golder prepared the coal combustion residuals (CCR) Surface Impoundment No Alternative Disposal Capacity Documentation pursuant to 40 CFR 257.103(b)(1) for the Northern Indiana Public Service Company (NIPSCO) R.M. Schahfer Generating Station (RMSGs) in Wheatfield, Indiana in February 2019. The 2019 documentation was prepared for the three active surface impoundments referred to as the Waste Disposal Area (WDA), Metal Cleaning Waste Basin (MCWB), and Material Storage Runoff Basin (MSRB). Each of these unlined impoundments failed to successfully demonstrate the groundwater separation (location restriction) standard of 40 CFR §257.60 and as a result, must close. In accordance with 40 CFR §257.103(b), NIPSCO intends to continue using the WDA, MCWB and MSRB to manage CCR waste streams until a planned shutdown of all coal-fired units in 2023. As part of the No Alternative Disposal Capacity Documentation prepared in 2019, Golder evaluated potential disposal options and found that there is no existing alternative disposal capacity on- or off-Site that could accept the flow being impounded in the MSRB, MCWB, and WDA at RMSGs.

This letter was prepared pursuant to 40 CFR 257.103(b)(1)(iii) to present an annual progress report documenting the continued lack of alternative capacity and to report progress toward closure of the coal-fired units and, by extension, the CCR surface impoundments. Golder reviewed the information included in the 2019 No Alternative Disposal Capacity Documentation and confirmed with NIPSCO that there have been no operational changes at RMSGs since the 2019 documentation was prepared and verified that the water flow evaluated in 2019 is still representative of the current operation at RMSGs. As such, there is still no existing alternative disposal capacity on- or off-Site that could accept the volume of flow being impounded on a daily basis in the MSRB, MCWB, and WDA.

NIPSCO plans to cease receipt of CCR waste streams in the MCWB and MSRB by October 31, 2020, is modifying the distribution piping network to bypass these impoundments and has submitted a Closure Application for review and approval by Indiana Department of Environmental Management (IDEM). Once flow is rerouted and the Closure Application approved, closure of the MCWB and MSRB will commence.

Golder Associates Inc.
670 North Commercial Street, Suite 103, Manchester, NH 03101

T: +1 603 668-0880 F: +1 603 668-1199

Golder has prepared this report to provide documentation pursuant to 40 CFR §257.103(b)(1)(iii) 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. A Statement of Certification is included in Exhibit A as an attachment. It is Golder'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 257.103(b)(1)(iii), supports that there is no existing alternative disposal capacity on- or off-Site that could accept the flow currently being impounded in the MSRB, MCWB, and WDA at RMSGS.

Sincerely,

Golder Associates Inc.



Megan Melendy
Senior Consultant



Richard Wesenberg
Principal and Program Leader

MCM/RAW/drb

Attachments: Exhibit A – Statement of Certification

p:\projects\2019\19115105 nipsco rmsgs no alternative disposal\feb2020 - annual update\no alternative annual update.docx



Northern Indiana Public Service Company (NIPSCO) R.M. Schahfer Generating Station (RMSGs)
Wheatfield, Jasper County, Indiana
Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Waste Disposal Area


STATEMENT OF CERTIFICATION**NIPSCO RMSGs MATERIAL STORAGE RUNOFF BASIN, METAL CLEANING WASTE BASIN, AND
WASTE DISPOSAL AREA****DOCUMENTATION FOR NO ALTERNATIVE DISPOSAL CAPACITY FOR EXISTING CCR SURFACE
IMPOUNDMENTS – ANNUAL UPDATE**

40 Code of Federal Regulations (CFR), Part 257.103(b)(1)(iii)

Golder understands that NIPSCO intends to continue using coal-fired Units 17 and 18 at RMSGs for a limited remaining period, with a planned shutdown of all units announced for 2023. Units 17 and 18's coal-fired boilers will continue to generate CCR waste streams that, in compliance with the conditions of 40 CFR §257.103(b), can be managed in existing on-Site CCR impoundments. The MSRB and MCWB impoundments will cease receipt of CCR associated water by October 31, 2020 and will subsequently begin closure preparations.

I, Richard Wesenberg, certify that I have personally examined and am familiar with the provisions of Title 40 of the Code of Federal Regulations Section 257.103(b)(1)(iii) and with the information submitted in the NIPSCO RMSGs CCR Surface Impoundment No Alternative Disposal Capacity Documentation – Annual Update, prepared by Golder Associates Inc., dated February 2020. 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 257.103(b)(1)(iii) 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 MSRB, MCWB, and WDA at RMSGs.




Richard A. Wesenberg, PE
Program Leader and Principal
Registered Professional Engineer
State of Indiana No.: PE11500584

2-13-2020