



REPORT

Northern Indiana Public Service Company, LLC R.M. Schahfer Generating Station

Annual RCRA CCR Unit Inspection Report

Restricted Waste Type I Landfill - Operating Permit Number 37-01

Submitted to:

Northern Indiana Public Service Company, LLC

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Submitted by:

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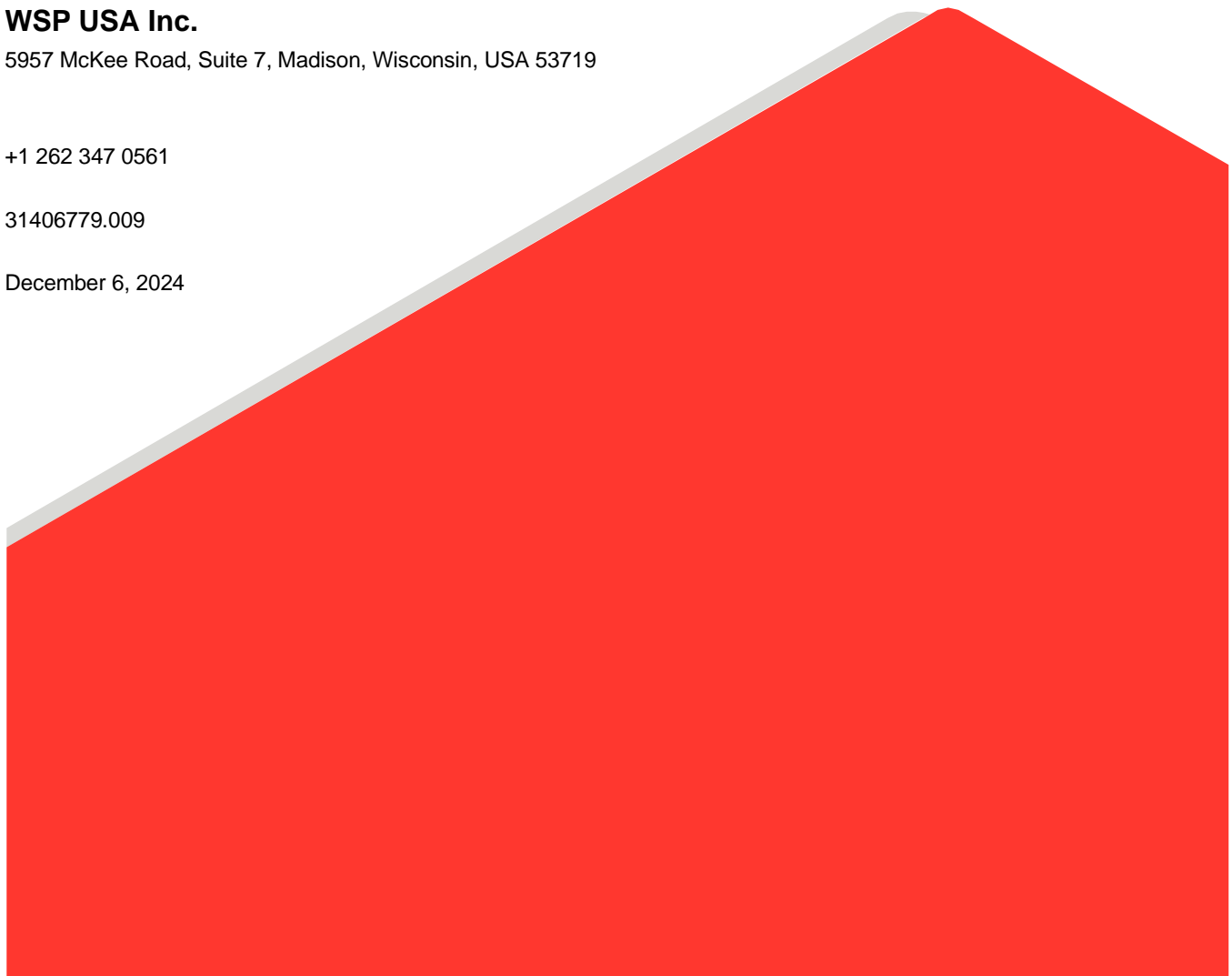


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1.0 INTRODUCTION

The United States Environmental Protection Agency (EPA) promulgated the Resource Conservation and Recovery Act (RCRA) Coal Combustion Residuals (CCR) Rule (Rule) on April 17, 2015, with an effective date of October 19, 2015. The Rule requires owners or operators of existing CCR landfills to have those units inspected on an annual basis by a qualified professional engineer in accordance with 40 CFR 257.84(b)(1). The annual qualified professional engineer inspections are required to be completed and the results documented in inspection reports [per 40 CFR 257.84(b)(2)] for CCR landfills. WSP USA Inc (WSP) was retained by Northern Indiana Public Service Company, LLC (NIPSCO) to perform the 2024 annual inspection of the Restricted Waste Site Type I Landfill, permitted by the Indiana Department of Environmental Management (IDEM), per Permit Number 37-01, most recent renewal dated May 27, 2020, a CCR landfill located at the R.M. Schahfer Generating Station (RMSGGS, Site).

This report presents the results of the 2024 annual inspection of the CCR landfill unit at the NIPSCO RMSGGS located in Wheatfield, Jasper County, Indiana. The inspection was conducted to comply with §257.84 of the CCR Rule.

Per 40 CFR 257.84(b)(1), WSP reviewed available information regarding the status and condition of the CCR unit and performed an onsite visual inspection, which was conducted on October 9, 2024. The objectives of the inspection included the following:

- Review Operational Records (as applicable, see Section 3):
 - Design and construction information
 - Results of previous structural stability assessments
 - Results of previous annual inspections
- Visually inspect the CCR unit to identify signs of distress or malfunction of the CCR unit.

In accordance with §257.84(b)(2), this inspection report has been prepared by a qualified professional engineer documenting the operational records review and visual inspection and identifying the following since the previous annual inspection:

- Any changes in geometry of the CCR landfill since the previous annual inspection
- The approximate volume of CCR contained in the CCR unit at the time of the inspection
- Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit
- Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

2.0 FACILITY DESCRIPTION

NIPSCO was given approval for a minor modification to their operating permit from IDEM to operate a Type I, Restricted Waste Landfill (RWS I) at RMSGGS on May 27, 2020 (Operating Permit 37-01). The active portions of the CCR landfill take dry fly ash and other approved coal combustion wastes from the RMSGGS units, Michigan City Generating Station units, and Bailly Generating Station units. The landfill is located east of the generating

station and has a total permitted area (closed, active, and future) of waste placement of approximately 170 acres. The current landfill footprint is divided into nine phases. Phases I, II, III, and IV were closed prior to the effective date of the CCR Rule. Phases V and VI are lined and have been closed. Phase VII construction was completed in 2018 and was commencing waste placement as of the 2024 inspection. Phase VIII construction was completed in 2023 and approved for waste placement by IDEM. No date has been set for the construction of Phase IX as of this time. Phases V, VI, VII, and VIII have a soil/geosynthetics floor liner with a 3 horizontal to 1 vertical (3H:1V) perimeter containment berm with a crest elevation of approximately 667 feet above mean sea level (amsl). The 3H:1V perimeter containment berm is currently approximately 13,000 feet long, measured along the crest. The maximum height of the closed portion of the landfill is approximately 726 feet amsl.

NIPSCO has determined that Phases V, VI, VII, and VIII of the landfill are subject to the CCR Rule requirements as being active as of the effective date of the CCR Rule. As such, this annual inspection pertains to Phases V, VI, VII, and VIII. Phase V is approximately 18 acres, is located in the southwestern corner of the landfill footprint, and was closed in 2017. Phase VI is approximately 15 acres, is located directly to the north of Phase V, and was closed in 2021. Phase VII is approximately 14 acres and is located north of Phase VI. Phase VIII is approximately 14 acres and is located north of Phase VII, no filling activities were currently occurring in Phase VIII. As of the timing of this report, waste placement activities were only occurring within Phase VII.

3.0 BACKGROUND AND DOCUMENT REVIEW SUMMARY

The existing reports reviewed for this assessment are summarized in Table 1, below.

Table 1: Summary of Background Document Review

Document	Date	Author
NIPSCO Phase III – FGD/Fly Ash Landfill Construction, R.M. Schahfer Generating Station, Wheatfield, Indiana, Contract Drawings	April 12, 1996	Burns & McDonnell
NIPSCO Phase I – FGD/Fly Ash Landfill Construction, R.M. Schahfer Generating Station, Wheatfield, Indiana, Phase I Landfill Reclosure, Intermediate Grading Plan	November 6, 1998	Burns & McDonnell
NIPSCO Phase I – FGD/Fly Ash Landfill Construction, R.M. Schahfer Generating Station, Wheatfield, Indiana, Phase I Landfill Reclosure, Details	November 23, 1998	Burns & McDonnell
NIPSCO Phase I – FGD/Fly Ash Landfill Construction, R.M. Schahfer Generating Station, Wheatfield, Indiana, Phase I Landfill Reclosure, Final Grading Plan	January 12, 1999	Burns & McDonnell
NIPSCO Phase IV – Fly Ash Landfill Closure, R.M. Schahfer Generating Station, Wheatfield, Indiana	April 10, 2013	Burns & McDonnell
NIPSCO R.M. Schahfer Generating Station Specification, Front End Specifications for Phase IV Fly Ash Landfill Closure Construction Quality Assurance (CQA) (Includes CQA Plan)	April 16, 2013	Burns & McDonnell
NIPSCO Phase VI – Fly Ash Landfill Construction Contract – Record Drawings, R.M. Schahfer Generating Station, Wheatfield, Indiana	November 25, 2014	Sargent & Lundy

Document	Date	Author
Northern Indiana Public Service Company R.M. Schahfer Generating Station – First Annual RCRA CCR Unit Inspection Report – January 2016 - Restricted Waste Type I Landfill - Operating Permit Number 37-01	January 2016	Golder Associates Inc.
NIPSCO R.M. Schahfer Generating Station, CCR Landfill Run-on and Run-off Control System Plan	October 2016	Golder Associates Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Second Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	January 2017	Golder Associates Inc.
Weekly Inspection Reports	2017-October 2022	NIPSCO
Minor Modification Request, Permit FP 37-01, NIPSCO – R.M. Schahfer Generating Station, Wheatfield, Indiana, Jasper County	November 2017	NIPSCO and Weaver Consultants Group
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Third Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	January 2018	Golder Associates Inc.
Solid Waste Land Disposal Facility - Minor Modification – R.M. Schahfer Generating Station RWS 1, Jasper County, SW Program ID 37-01, Approval Letter	May 2018	IDEM
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Fourth Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	January 2019	Golder Associates Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Fifth Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	January 2020	Golder Associates Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Sixth Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	December 31, 2020	Golder Associates Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Seventh Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	December 31, 2021	Golder Associates USA Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Eighth Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	December 31, 2022	Golder Associates USA Inc.

Document	Date	Author
Northern Indiana Public Service Company R.M. Schahfer Generating Station, Ninth Annual RCRA CCR Unit Inspection Report, Restricted Waste Type I Landfill, Operating Permit Number 37-01	December 4, 2023	WSP USA Inc.

4.0 2024 VISUAL INSPECTIONS

The 2024 onsite inspection of the active portions of the CCR landfill (Phase VI) was performed by Mr. John Puls, P.E. on October 9, 2024. Mr. Puls is a Professional Engineer licensed in the State of Indiana and was directed by Mr. Joe Kutch, Manager, Environmental Compliance with NiSource Corporate Services.

The inspection provided the following information, as stipulated in 40 CFR 257.84(b):

- Any changes in geometry of the CCR landfill since the previous annual inspection.
 - Phase VII construction was completed in 2018 and waste placement was ongoing at the time of inspection.
 - Phase VIII construction was completed in 2023 and is approved for waste placement, no waste placement activities were occurring during the 2024 inspection.
- The approximate volume of CCR contained in the CCR unit at the time of the inspection.
 - Approximately 2,212,115 cubic yards as of October 9, 2024 (an addition of approximately 826,000 cubic yards since the previous inspection) in Phase VII of the CCR landfill as reported by NIPSCO.
- Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit.
 - None were observed.
- Any other change(s) that may have affected the stability or operation of the CCR unit since the previous annual inspection.
 - A washout in the northeast corner of the Phase VIII overlay was observed that exposed the geosynthetic liner system. This should be addressed by ongoing maintenance activities on the interior slopes of the landfill.

Based on observations made on October 9, 2024, the overall condition of the active portions of the CCR landfill is acceptable with continued routine maintenance of interior slopes. No structural weaknesses or safety issues were observed within the berms, active areas, or closed areas.

5.0 CLOSING

This report has been prepared in general accordance with normally accepted civil engineering practices to fulfill the RCRA reporting requirements in accordance with 40 CFR 257.84(b). Based on our review of the information provided by NIPSCO and on WSP's onsite visual inspection, the overall condition of the landfill is acceptable. WSP's assessment is limited to the information provided to us by NIPSCO and to the features that could be inspected visually in a safe manner. WSP cannot attest to the condition of subsurface or submerged structures.

Signature Page

WSP USA Inc.

A handwritten signature in blue ink, appearing to read "J. Puls", is written over a light gray grid background.

John Puls, PE #12000338
Assistant Vice President





wsp.com