Annual CCR Fugitive Dust Control Report in support of

40 CFR Part 257

for Northern Indiana Public Service Company's

Rollin M. Schahfer Generating Station



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Introduction

The rule titled "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities" (hereinafter the "CCR Rule") was published as a final rule in the *Federal Register* on April 17, 2015 [80 FR 21302] and codified at 40 CFR 257 Subpart D.

Northern Indiana Public Service Company (NIPSCO) is the owner and operator of Rollin M. Schahfer Generating Station (RMSGS) located in Jasper County near Wheatfield, Indiana. There are four coal-fired electric utility steam generating units at RMSGS:

- Unit 14 is a cyclone coal-fired boiler with a design heat input capacity of 4,650 million British thermal units per hour (MMBtu/hr)
- Unit 15 is a pulverized coal-fired boiler with a design heat input capacity of 5,100 MMBtu/hr
- Unit 17 is a pulverized coal-fired boiler with a design heat input capacity of 3,967 MMBtu/hr
- Unit 18 is a pulverized coal-fired boiler with a design heat input capacity of 3,967 MMBtu/hr

Per 40 CFR 257.80(a), the owner or operator of a coal combustion residuals (CCR) landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. These measures are contained in the CCR Fugitive Dust Control Plan for RMSGS that was timely placed in NIPSCO's operating record.

Furthermore, 40 CFR 257.80(c) requires the owner or operator of the CCR unit to prepare an annual CCR fugitive dust control report. This document constitutes the annual CCR fugitive dust control report for RMSGS.

Requirement 1 - Actions Taken to Control CCR Fugitive Dust

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust."

[40 CFR §257.80(c)]

The following actions were taken to control CCR Fugitive Dust, in accordance with the CCR Fugitive Dust Control Plan for RMSGS.

Fly Ash

Fly ash produced from Units 14, 15, 17 and 18 was pneumatically conveyed to storage silos at the plant equipped with cyclone separators, collector bag filters, and bin vent bag filters. Dry fly ash was unloaded from the silos into pneumatic trucks where fugitive dust emissions were controlled by use of a telescopic chute with a vacuum system that returned fugitive fly ash dust to the silo. A bin vent filter on each silo controlled emissions resulting from the vacuum return process.

Fly ash in pneumatic trucks was either transported to the onsite fly ash conditioning facility or trucked offsite and sold. Trucks with fly ash to be conditioned delivered it to a pneumatic truck unloading station located at the fly ash conditioning facility. This unloading station also received fly ash from operations at NIPSCO's Bailly Generating Station, and fly ash and dry flue gas desulfurization (FGD) residue from NIPSCO's Michigan City Generating Station. The pneumatic unloading system transferred fly ash and FGD residue to storage silos at the fly ash conditioning facility. CCR dust emissions from the pneumatic truck unloading system and transfer to the storage silos were controlled by a baghouse.

In addition to delivery with pneumatic trucks, fly ash from Units 17 and 18 was transported from those units directly to the storage silos at the onsite fly ash conditioning facility via an enclosed pneumatic conveyor system. CCR dust emissions from this process were controlled by a baghouse.

At the fly ash conditioning facility, fly ash and FGD residue were transferred from the storage silos to pugmills and conditioned with water. The CCR dust emissions from this transfer were minimized by equipment enclosure, moisture addition, and a dust collection system with wet collectors.

After the fly ash and FGD residue were conditioned in the pugmills, the material was stacked out to a temporary pile on a containerized surface via a radial conveyor system. Any CCR dust emissions from the temporary pile and the transfer were minimized by the moisture present in the conditioned fly ash and FGD residue. The conditioned material was then loaded into haul trucks for transportation and disposal in an onsite landfill. Any CCR dust from these transfers was controlled by the moisture present in the conditioned material.

Bottom Ash

Bottom ash was produced from Units 15, 17 and 18, and sluiced to a surface impoundment. Due to the nature of bottom ash and the wet sluicing process, there were not CCR fugitive dust concerns from this process.

Slag

The slag produced from Unit 14 was wet sluiced to a surface impoundment and stored there until reclaimed. Due to the nature of slag and the wet sluicing process, there were not CCR fugitive dust concerns from this process.

Gypsum

Synthetic gypsum was produced from the wet FGD systems on Units 14, 15, 17 and 18. The operational nature of the wet FGD systems produced gypsum already containing moisture. The gypsum was conveyed to either a containerized surface or directly to the neighboring wallboard plant. If the wallboard plant did not receive the gypsum at the time of its production, the gypsum was taken to a holding area on the RMSGS property, where it resided until delivered to the wallboard plant. Because the wallboard plant purchases gypsum from NIPSCO and is marketed as a product, the gypsum is not subject to the CCR Rule.

Gypsum found to be off-specification was not sold to the wallboard plant and was landfilled onsite. As mentioned above, this gypsum was already conditioned with moisture.

Haul Roads

Water trucks were used to wet the haul roads to minimize the release of dust from transportation activities at the station. Road watering was suspended during periods of freezing conditions when watering would have been inadvisable for safety conditions (e.g., icy roads).

Requirement 2 - Record of Citizen Complaints

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes... a record of all citizen complaints."

[40 CFR §257.80(c)]

NIPSCO has not received any citizen complaints regarding fugitive dust events at RMSGS as of November 8, 2018.

Requirement 3 - Corrective Measures

"The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes... a summary of any corrective measures taken."

[40 CFR §257.80(c)]

There has not been a need for corrective measures, as NIPSCO has not identified any fugitive dust conditions that would require corrective measures or received any citizen complaints regarding fugitive dust at RMSGS as of November 8, 2018.